

Reading Borough Council
Development Control
PO Box 17
Reading
Berkshire
RG1 7TD

Our ref: WA/2025/132370/01-L01
Your ref: PL/25/0886
Date: 28 July 2025

Dear Sir/Madam

Discharge Of Conditions 4 (Demolition And Construction Method Statement) And 5 (Contamination Assessment) Of Planning Permission PI/22/0258, As Allowed On Appeal (Ref: App/E0345/W/23/3315618) On 02/04/2024.

220 Elgar Road South, Reading, RG2 0BW

Thank you for consulting us on this discharge of condition application on 3 July 2025. We have reviewed the information submitted in line with our planning remit.

Environment Agency Position

We **do not recommend** even partial discharge of condition 5. Based on the Revised Contamination Report version 1.3 dated July 2025, our view is that parts (i) and (ii) of the condition have not been adequately completed with respect to risk to controlled waters, groundwater and surface water for the following reasons:

1. groundwater flow direction in the Lambeth Beds has not been confirmed from information obtained as part of the site investigation;
2. there are parts of the site where no trial holes are present and therefore no indication of soils contamination and the risk to groundwater. Sampling and analysis of soils have only been completed at shallow depth within the made ground;
3. the proposal includes piles into the Chalk principal aquifer and below groundwater level and yet there has been no assessment of Chalk groundwater quality or groundwater flow direction;
4. Tetrachloroethylene has been found above drinking water standards but has not been further assessed; it has only been risk assessed as a vapour
5. for a number of determinands the LoD used is above DWS, and above EQS in some cases. This does not allow for proper assessment;

On 25 March 2025, we published updated Flood Zones alongside other datasets for use in development. Planners and flood risk professionals – find out more at [Development planning \(including Flood Map for Planning\)](#). Guidance for developers is available through the [Town and Country Planning Association](#) [New national flood and coastal erosion risk information - Town and Country Planning Association](#)

6. the level 2 (groundwater) risk assessment has been undertaken and identified numerous exceedances within the groundwater at the site likely to have a detrimental effect on the underlying aquifer and potentially impacting the surface water nearby; this has not been adequately followed through using quantitative, or even semi-quantitative analysis;
7. our normal requirement under the circumstances presented are at least boundary groundwater quality and level monitoring before, during and after construction, especially the piling phase. The details we expect to see will be dependent upon the results provided with respect to the missing information mentioned above. We note that BHs1 and 2 do not appear to be within the footprint of the proposed building and therefore may be appropriate to include as part of the full set of groundwater monitoring boreholes;
8. there is no acknowledgement of the effect that infiltration by soakaways may have on contaminant migration to controlled waters, or assessment of this.

Please consult us on any further information submitted by the applicant.

Advice to Applicant - Other Consents

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing. Please see www.gov.uk/guidance/check-if-you-need-an-environmental-permit.

This includes any proposal to undertake work in, over, under, or within 8 metres of the top of the bank of a designated Main River, called a Flood Risk Activity permit.

Final comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below. Please quote our reference number in any future correspondence.

Yours faithfully

Sarah Warriss-Simmons
Planning Advisor

Direct dial 0203 025 9855

Direct e-mail Planning_THM@environment-agency.gov.uk