

# Planning Statement

Thames Water Arborfield Trunk Main - Temporary Construction  
Compound Vehicle Access

October 2025

## Quality information

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# 1. Introduction

## 1.1 Overview of the Proposed Development

1.1.1 Thames Water Utilities Limited ('the Applicant') is seeking full planning permission under the Town and Country Planning Act 1990 (as amended) for the construction of a temporary vehicle access with hardstanding (the Proposed Development), on land south of Barkham Road, Barkham, Berkshire, RG41 4TJ ('the Site').

1.1.2 The application for full planning permission is submitted to the unitary authority of Wokingham Borough Council (WBC), as the Site lies within WBC's administrative area.

1.1.3 The Proposed Development is required in relation to a temporary construction compound and pipeline reinforcement works (Arborfield Trunk Main Reinforcement Project), which constitute permitted development under the Town and Country Planning (General Permitted Development) (Order) 2015 (the GPDO). Planning permission is not required for these reinforcement works as these works will be carried out under permitted development (PD) rights provided to statutory water undertakers in Schedule 2, Part 13, Class A of the GPDO. A temporary construction compound would also be required for the reinforcement works and would not require planning permission either as this can be carried out under PD rights under Class A of Part 4 of the GPDO.

1.1.4 Class B of Schedule 2, Part 2 of the GPDO allows for "*the formation, laying out and construction of a means of access to a highway which is not a trunk road or a classified road*". However, due to the Proposed Development being on a classified 'B' road (Barkham Road), these PD rights are not applicable.

1.1.5 This Planning Statement has been prepared by AECOM Ltd, on behalf of the Applicant, in support of the planning application.

## 1.2 The Applicant

1.2.1 The Applicant is Thames Water Utilities Limited. Thames Water are a statutory Water & Sewerage Undertaker and serve 16 million customers across London and the Thames Valley. Thames Water supply approximately 2.5 billion litres of drinking water every day.

1.2.2 The Proposed Development is required to facilitate access to a temporary construction compound for the Arborfield Trunk Main Reinforcement Project. This Reinforcement Project is required to support new developments in the local area, principally the redevelopment of the former Arborfield Garrison as the Arborfield Green residential area (approximately 2000 new dwellings). Further details on the need for the development are provided in Section 3.1 of this Statement.

## 1.3 Purpose and structure of this document

1.3.1 This Planning Statement provides an appraisal of the Proposed Development's conformity with the Development Plan and other material considerations relevant to the determination of the Application.

1.3.2 This Planning Statement is structured as follows:

- **Section 2** describes the application site and surrounding context, environmental designations and planning history;
- **Section 3** sets out a description of the Proposed Development and the relevant planning;
- **Section 4** provides a summary of the relevant planning policy context
- **Section 5** considers the planning merits of the proposal, having regard to planning policy and other guidance.
- **Section 6** sets out the conclusion and planning balance.

## 1.4 Supporting information

1.4.1 This application is for minor development, i.e. development where the site area is less than 1 hectare.

1.4.2 The planning application comprises the following documents:

**Table 1-1. Application documents list**

Document Title	Revision	Date
Cover Letter	01	23 September 2025
Tree Survey Report – L017	01	31 January 2025
Biodiversity Net Gain Metric and exemption letter	01	19 September 2025
Great Crested Newt Statement	01	23 September 2025
Ecological Note	01	January 2025

1.4.3 Below is a schedule of application drawings that form part of the planning application.

**Table 1-2. Application drawing list**

Drawing No.	Title	Revision
L017-IL-XX-200-DR-CE-0001	Location Plan	P01
L017-IL-XX-200-DR-CE-0002	Site Layout Plan	P01
L017-IL-XX-200-DR-CE-0003	Visibility Splays	P01
L017-IL-XX-200-DR-CE-0004	Proposed Elevations	P01

## 2. Site and surroundings

### 2.1 Site description

2.1.1 The Site would form the access to a temporary construction compound. It measures 24.7 m<sup>2</sup> (approximately 0.0025 ha) in size and is comprised of a strip of highway verge and the adjoining agricultural land. The Site is located on the southern side of the B3349 Barkham Road extending between Arborfield Green and Barkham.

2.1.2 The Site is surrounded by agricultural land. To the northeast, on the opposite side of Barkham Road, there is a row of residential properties (Bridge Cottages). Approximately 25 m to the east, there is a balancing pond that was formed as part of another development.

2.1.3 The Site is located approximately 1.4 miles southwest of the village of Barkham.

2.1.4 The temporary construction compound associated with the Proposed Development would be located to the south of the Site and would wrap around the balancing pond and join an existing vehicle access to the east of the Site.

2.1.5 The temporary construction compound would have the following elements:

- Site office
- Canteen/dry room
- Toilets
- Store
- Pipe and Fittings Store
- Skip
- Temporary road
- Pedestrian walkway
- Vehicle parking.



**Figure 2-1-1: Aerial Image of the Site (Google Maps, 2025)**

## 2.2 Environmental designations

- 2.2.1 The Site is comprised predominantly of a section of highway verge and includes a very small area of Grade 3 agricultural land<sup>1</sup>. The area of agricultural land affected by the Proposed Development would be negligible.
- 2.2.2 The Site is not located within the Green Belt or near any designated National Landscapes, Special Areas of Conservation (SAC) or Sites of Specific Scientific Interest (SSSI).
- 2.2.3 There are no designated heritage assets within the Site. There are two Grade II Listed buildings to the east of the Site, Sparks Farmhouse (ref: 1118114) approximately 400 metres to the east, and The Bull Pub House and Smithy (ref: 1118113) approximately 500 metres to the east. However, due to the minor scale of the Proposed Development, it is not expected that it would have any impact on their setting.
- 2.2.4 The Site is located entirely within Flood Zone 1<sup>2</sup>, therefore is considered to have a low probability of flooding.
- 2.2.5 There are no Public Rights of Way crossing the Site.

<sup>1</sup> Available here: [Agricultural Land Classification map London and the South East - ALC007](#)

<sup>2</sup> Available here: [Map – Flood map for planning – GOV.UK](#)

## 3. The Proposed Development

### 3.1 The need for the Proposed Development

3.1.1 The Proposed Development is for the construction of a temporary vehicle access along Barkham Road. This is to provide access for construction traffic through a proposed temporary construction compound, which does not form part of the planning application, as it will be implemented under Permitted Development Rights.

3.1.2 This proposed temporary construction compound would be needed in relation to wider pipeline upgrade works, which are hereafter referred to as 'the Project'. The Project involves the upsizing of an existing clean water distribution main by installing approximately 2.5 km of new pipeline from Bearwood Road to Barkham Road and Langley Common Road.

3.1.3 The Project is required in response to proposed new developments in the local area, principally the Arborfield Garrison redevelopment, which is expected to include up to 2000 dwellings and is an allocated Strategic Development Location (SDL) as set out within Policy CP18 of the WBC's Core Strategy. These new developments are predicted to have a major impact on the clean water network, and the proposed network reinforcement is therefore necessary to meet the demands of growth.

3.1.4 The Project would be permitted development under Schedule 2, Part 13 (Water and Sewerage) Class A (a) of the GPDO 2015, which allows for the following:

*'Development for the purposes of their undertaking by statutory undertakers for the supply of water or hydraulic power consisting of:*

*a) development not above ground level required in connection with the supply of water or for conserving, redistributing or augmenting water resources, or for the conveyance of water treatment sludge;'*

3.1.5 The proposed temporary construction compound (to which the Proposed Development is to provide access to) is located directly adjacent to the Project's working area. As such, it also constitutes permitted development under Schedule 2, Part 4 (Temporary Buildings and Uses), Class A of the GPDO, which allows for the following:

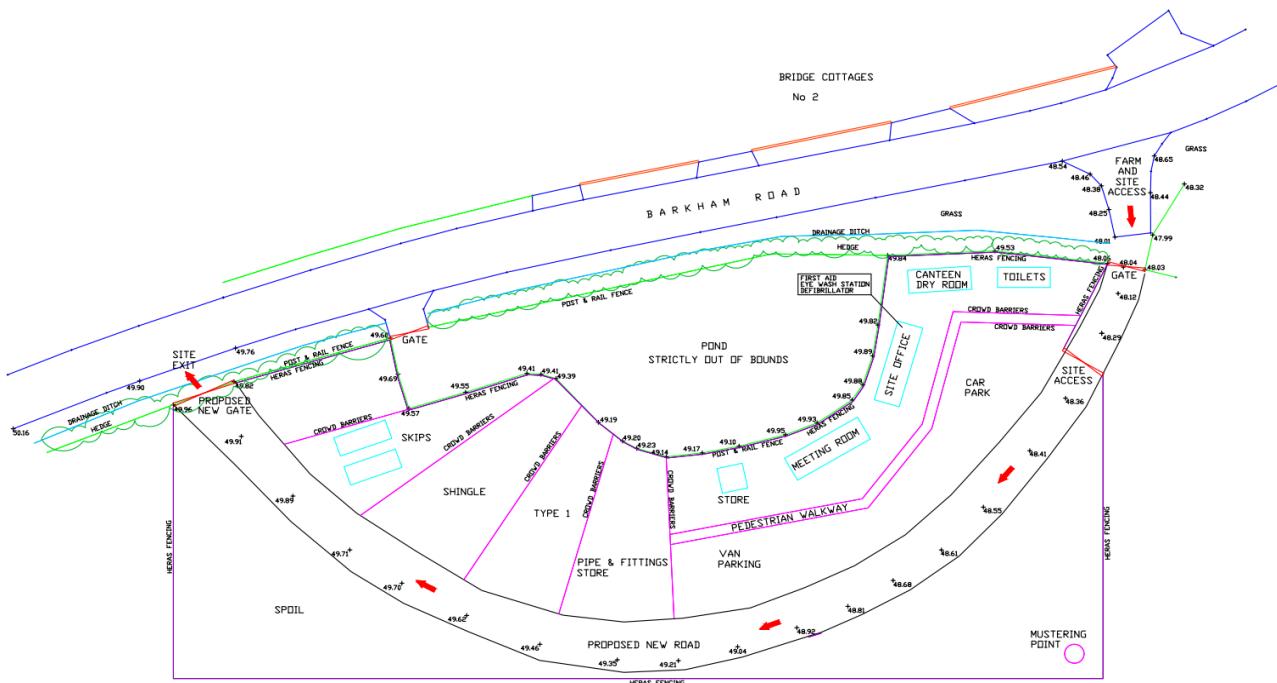
*'The provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land.'*

3.1.6 However, the proposed vehicle access does not fall under the provisions set out within the GPDO as it is on a classified highway and as such, full planning permission is required for it. The Proposed Development would be PD under Class B of Part 2 if it were on an unclassified highway.

3.1.7 The Proposed Development is needed to enable one-way transit through the proposed temporary construction compound for construction traffic: while there is an existing access located to the east of the Site (along Barkham Road) which will be used by vehicles entering the construction compound, the Proposed Development would provide an exit point for vehicles leaving the construction compound. This would avoid the need for vehicles to reverse onto Barkham Road or turn around on Barkham Road, which could negatively impact traffic and highway safety. Therefore, the Proposed Development would ensure that construction vehicles enter and leave the construction compound safely and efficiently.

3.1.8 The figure below illustrates the layout of the Project's proposed temporary construction compound.

3.1.9 Although it is not a condition of the relevant class in the GPDO, a letter informally notifying WBC of the Applicant's intention to carry it out the Project was sent on 10<sup>th</sup> October 2025.



**Figure 3-1-1: Layout of proposed temporary construction compound**

### 3.2 Description of the Proposed Development

- Installation of concrete between road and existing fence line to a depth of approximately 10 cm
- Vegetation clearance and hedgerow removal
- Installation a new dropped kerb
- Removal of existing post and wire fence.

3.2.2 It is anticipated that the Proposed Development would be required for the duration of the Project's construction, which is estimated to be two years. The temporary access will be removed and the land reinstated, once the construction of the Project is complete.

3.2.3 The Proposed Development would have a total area of approximately 24.7 m<sup>2</sup>. The bell mouth would have a maximum width of approximately 8.5 metres and a minimum width of approximately 4.7 m. The access would extend back from the highway by approximately 4.1 m.

3.2.4 The Proposed Development would be surfaced with hard standing (concrete).

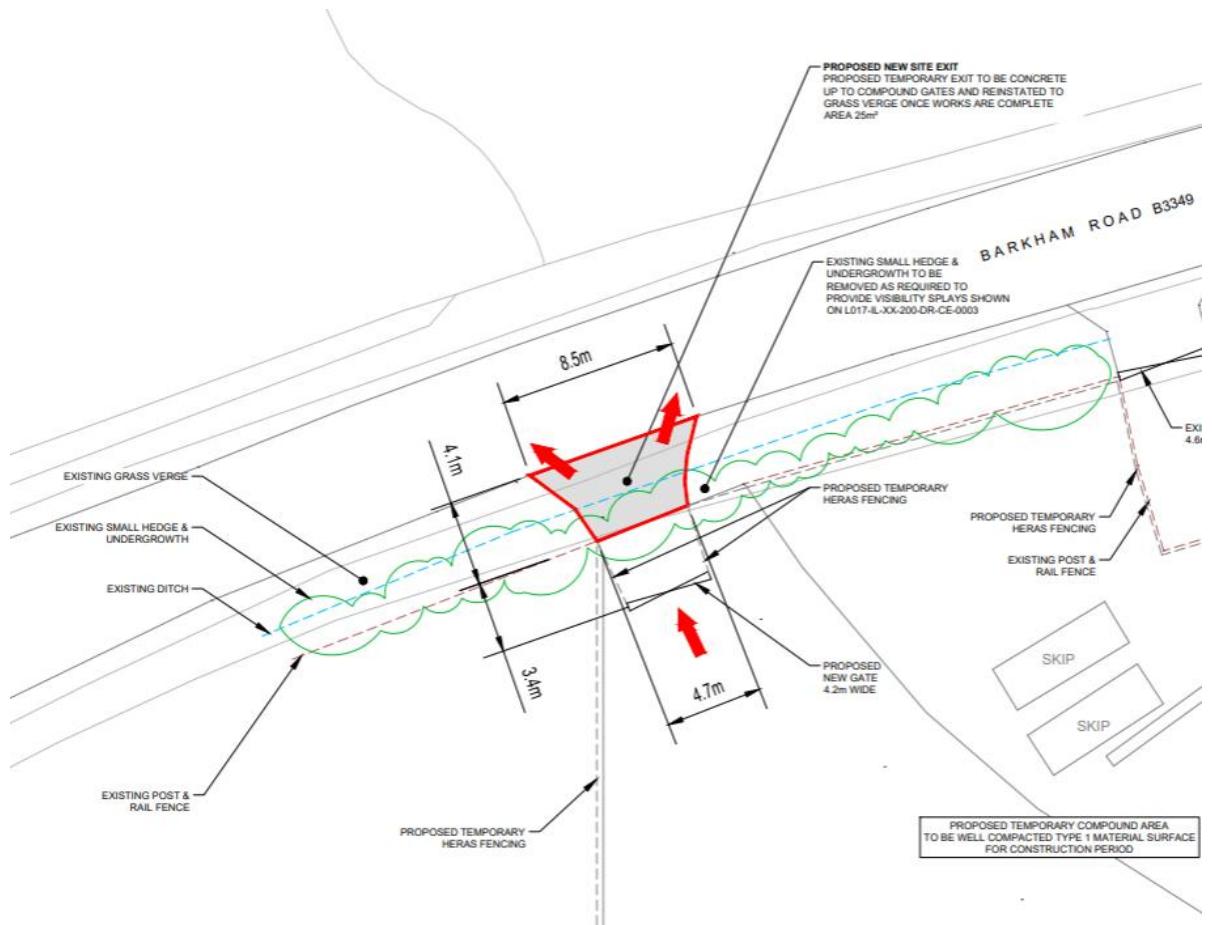


Figure 3-1-2: Proposed Site Layout for the Proposed Development

### 3.3 Relevant planning history

3.3.1 The Site has been used previously in similar circumstances, i.e. to provide vehicle access to a construction compound in the same location as the one proposed in relation to the Project, to the south of Barkham Road.

3.4 In August 2018, WBC approved an “*application for a certificate of lawfulness for the proposed widening of highway carriageway, to include construction of a new road bridge (adjacent to existing bridge) and associated highway drainage engineering works*” (ref. 181805) on land at Barkham Bridge, to the east of the Site.

3.5 The works subject to the certificate of lawfulness (ref. 181805) were carried out on behalf of WBC as the Highways Authority and constituted permitted development (under Schedule 2, Part 9 Development relating to roads, Class A Development by highways authorities of the GPDO), which states that the following is permitted development:

‘A. *The carrying out by a highway authority -*

(a) *on land within the boundaries of a road, of any works required for the maintenance or improvement of the road, where such works involve development by virtue of section 55(2)(b) of the Act; or*

(b) *on land outside but adjoining the boundary of an existing highway of works required for or incidental to the maintenance or improvement of the highway’.*

3.6 To enable these works, a construction compound was set up to the south of Barkham Road, and a temporary vehicle access to this construction compound was provided at the location of the Site. Following completion of the works, the construction compound, including the vehicle access on the Site, were removed, and the land reinstated.

3.7 It is the Applicant's understanding that the construction compound and the vehicular access would have also constituted permitted development under Schedule 2, Part 9 (Development relating to roads), Class A (Development by highways authorities) of the GPDO.



**Figure 3-1-2: Site compound and vehicular access used for application site ref. 181805 in 2020 (Google Earth Historical Imagery)**

## 4. Planning policy context

### 4.1 Introduction

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004<sup>3</sup> requires that an application for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

4.1.2 The Site is located in the administrative area of WBC and the parish of Barkham. The Development Plan for the Site comprises the following:

- Wokingham Borough Core Strategy Development Plan Document (Adopted 29 January 2010)<sup>4</sup>
- Adopted Managing Development Delivery Local Plan (adopted February 2014)<sup>5</sup>
- Central and Eastern Berkshire Joint Minerals and Waste Plan (Adopted 19 January 2023)<sup>6</sup>
- Arborfield and Barkham Neighbourhood Plan 2019-2036 (adopted April 2020)<sup>7</sup>.

4.1.3 Other material considerations relevant to this Application include the National Planning Policy Framework (NPPF) 2024<sup>8</sup>.

4.1.4 WBC has been in the process of preparing a new Wokingham Local Plan Update 2023 – 2040. The emerging Local Plan Update (LPU) was submitted to the Secretary of State for examination by an Independent Planning Inspector on Friday 28<sup>th</sup> February 2025. If adopted, the LPU would replace the current Core Strategy and Managing Development Delivery Local Plan.

4.1.5 Paragraph 49 of the NPPF states that LPAs may give weight to relevant policies in emerging plans according to their stage of preparation (“*the more advanced its preparation, the greater weight that may be given*”). The LPU has reached an advanced stage of preparation, and it is therefore the Applicant’s view that it can therefore be afforded some weight in the determination of this Application.

### 4.2 The Development Plan

4.2.1 The Policies Map accompanying the Local Plan indicates that the Site is:

- located within the designated countryside
- part of a Green Route; and
- within a Great Crested Newt Impact Risk Zone (amber zone).

4.2.2 Relevant policies of the Development Plan are set out below.

#### Wokingham Borough Council Core Strategy 2010

4.2.3 The WBC Core Strategy, along with the MDD Local Plan, is the principal planning policy document for Wokingham Borough, providing the development strategy to deliver sustainable growth to the year 2026.

4.2.4 The following policies from the Core Strategy are relevant to the application:

- CP1 – Sustainable Development
- CP3 – General Principles for development
- CP6 – Managing Travel Demand
- CP7 - Biodiversity

<sup>3</sup> Planning and Compulsory Purchase Act 2004 Available from: [Planning and Compulsory Purchase Act 2004](#)

<sup>4</sup> Core Strategy 2010 Available from: [Final adopted Core Strategy](#)

<sup>5</sup> Managing Development Delivery Local Plan 2014 Available from: [Managing Development Delivery Development Plan](#)

<sup>6</sup> Central and Eastern Berkshire Joint Minerals and Waste Plan 2023 Available from: [JCEB Plan Consultation Document Proposed Submission V6 June 2020](#)

<sup>7</sup> Arborfield and Barkham Neighbourhood Plan 2020 Available from: [Neighbourhood Plan\\_Made\\_Version\\_April\\_2020.pdf](#)

<sup>8</sup> National Planning Policy Framework Available from: [National Planning Policy Framework - Guidance - GOV.UK](#)

- CP11 – Proposals outside Development Limits (including countryside)

## Managing Development Delivery Local Plan 2014

4.2.5 The MDD Local Plan, along with the WBC Core Strategy, provides the principal planning policy document for Wokingham Borough, which sets out the development strategy to deliver sustainable growth to the year 2026

4.2.6 The following polices from the MDD Local Plan are relevant to the application:

- Policy CC01 – Presumption in Favour of Sustainable Development
- Policy CC03 – Green Infrastructure, Trees and Landscaping
- Policy CC09 – Development and Flood Risk (from all sources)
- Policy CC10 – Sustainable Drainage
- Policy TB23 – Biodiversity and Development.

## Arborfield and Barkham Neighbourhood Plan

4.2.7 The Arborfield and Barkham Neighbourhood Plan seeks to shape, direct and help to deliver sustainable development by influencing the planning policies and decisions made by Wokingham Borough Council. It was formally made by Wokingham Borough Council on 22 April 2020.

4.2.8 Policy IRS2: Recognise, respect and preserve identity and rural setting of settlements is relevant to the Proposed Development.

## Joint Minerals and Waste Plan

4.2.9 The Central and Eastern Berkshire – Joint Minerals & Waste Plan (JMWP) forms the land use planning strategy for minerals and waste development within the administrative area covered by the Central & Eastern Berkshire Authorities. The Applicant considers that there is no relevant policy within the JMWP.

## 4.3 Material considerations

### National Planning Policy Framework 2024

4.3.1 The National Planning Policy Framework (NPPF) provides a framework for the Government's planning policies and sets out how these should be applied. The NPPF has been revised a number of times since it was first published in March 2012, and, with the latest revision in February 2025 for a footnote amendment not intended to constitute a change to the policy set out in December 2024. The NPPF must be taken into account in preparing the Development Plans and is a material consideration in planning decisions. The NPPF is divided into a series of topics relating to delivering sustainable development.

### Emerging Local Plan Update

4.3.2 Having reached a fairly advanced stage of preparation, the emerging Local Plan Update (LPU) can be a material consideration in the determination of this planning application.

4.3.3 The following draft policies are considered relevant to the application:

- Policy SS1 Sustainable development
- Policy SS5 Development in the Countryside
- Policy NE4: Trees, woodland, hedges and hedgerows
- Policy NE1: Biodiversity and geodiversity.

## 5. Planning appraisal

### 5.1 Introduction

- 5.1.1 This section appraises the Proposed Development's conformity with the Development Plan and other relevant local and national planning policies identified in Section 4. The following topics have been identified following the review of the Development Plan and other main planning policy material considerations.
- 5.1.2 The NPPF (in its paragraph 11) sets out a presumption in favour of sustainable development which, for decision-taking, means that "*approving development proposals that accord with an up-to-date development plan without delay*".

### 5.2 Principle of development

- 5.2.1 The Site is located outside of settlement limits and is within the designated countryside, as shown on the Local Plan Policies Map. As such, an assessment of the Proposed Development against Policy CP11: Proposals outside Development Limits of the Core Strategy is required. This policy seeks '*to protect the separate identity of settlements and maintain the quality of the environment*' by limiting new development in the countryside, except in a few circumstances which largely relate to buildings and dwellings in the countryside, and which do not apply to the Proposed Development.
- 5.2.2 The Proposed Development would be for the construction of a temporary access in order to provide vehicle access to a proposed temporary construction compound. The only physical development on the Site would be the installation of hard standing of approximately 27.4 m<sup>2</sup>. The Proposed Development would therefore be of minor in scale and would not undermine the "*separate identity of settlements*" and "*the quality of the environment*" would still be maintained. Therefore, the Proposed Development would not conflict with the overall purpose of Policy CP11.
- 5.2.3 Draft policy SS5: Development in the Countryside of the LPU is also relevant to the principle of development. This draft policy outlines the types of development that would generally be supported in the countryside: these include "*the provision of essential utilities and infrastructure (including development for strategic transport infrastructure which can demonstrate a requirement for a countryside location)*". As an infrastructure development, the principle of the Proposed Development would be supported by Draft Policy SS5.
- 5.2.4 In addition, the Proposed Development would be re-creating an access that has been used previously on the same site. Therefore, the principle of development has already been established, though it is noted that the original access was installed through permitted development rights and the land reinstated to its former condition following this.
- 5.2.5 There are also many other examples of vehicle accesses along this part of Barkham Road, including the access to the balancing pond, which is approximately 20 metres east of the Site, as well as the larger vehicle access, which is approximately 100 metres east of the Site.
- 5.2.6 The Proposed Development would accord with Policy CP11 of the Core Strategy and Draft Policy SS5 of the LPU. Therefore, the Proposed Development within the countryside would be acceptable in principle.

### 5.3 Impact on character and visual amenity

- 5.3.1 Policy CP1: Sustainable Development of the Core Strategy sets out that developments should "*maintain or enhance the high quality of the environment...*" (part 1) and "*provide attractive, functional, accessible, safe, secure and adaptable schemes*" (part 10).
- 5.3.2 Part a) of Policy CP3: General Principles for Development sets out that permission will be granted for proposals that:

*“...are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life.”*

5.3.3 Policy IRS2: Recognise, respect and preserve the identity and rural setting of settlements, of the Arborfield and Barkham Neighbourhood Plan, requires proposals to preserve the identity and rural setting of settlements, with regard to scale and form and density of development, as well as tree and hedgerow planting reflecting local biodiversity.

5.3.4 Draft Policy SS1 Sustainable Development of the LPU is also relevant to character and visual amenity. This draft policy sets out that development proposals should *“...maintain, enhance or create a high quality and safe environment which contributes positively to the character and identity of the area...”*.

5.3.5 The Proposed Development would involve the construction of a temporary vehicle access. The scale would be minor, with the site area only being approximately 24.7 m<sup>2</sup> and the width of the bell mouth being approximately 8.5 metres. The access would be concreted and would cover an area of 24.7 m<sup>2</sup>.

5.3.6 The Site contains a hedgerow, which forms part of a long hedgerow network that runs parallel to the south of Barkham Road. This hedgerow helps to contribute to the rural character of the area and is a distinctive feature of countryside locations. The Proposed Development would result in the loss of some of this hedgerow in order to facilitate the construction of the site access. However, given the small-scale hedgerow loss (less than 5 metres), this would not result in significant harm to the character of the area and the countryside.

5.3.7 It should be noted that this section of hedgerow was only recently planted following removal of temporary access used by Balfour Beatty for a highway development, so is not at the same level of maturity as the rest of the hedgerow. Also, the planting is not of the same quality and does not provide the same level of visual amenity as the rest of the hedgerow.

5.3.8 There are many other vehicle accesses along the south of Barkham Road, including an access to a balancing pond, which is approximately 20 metres to the east of the Site, and a vehicle access to an agricultural field approximately 100 metres to the east as well as multiple to the northwest of the Site to serve the dwellings along Barkham Road.

5.3.9 Furthermore, the proposed access would be temporary and would only be required for the duration of construction works for the Project (two years). Once the construction compound is removed, there would be no requirement for the proposed access: the proposed access would then be removed and the land reinstated and the hedge reinstated to as it was before, with provision of replacement or higher quality planting as necessary.

5.3.10 Overall, the Proposed Development is of a minor scale and would result in very limited and temporary harm to the character of the area, nothing that other vehicle accesses along this road already break up the hedgerow.

5.3.11 As such, the Proposed Development would accord with Policy CP1 and Policy CP3 of the Core Strategy, Policy IRS2 of the Arborfield and Barkham Neighbourhood Plan and draft policy SS1 of the LPU.

## 5.4 Green infrastructure

5.4.1 As shown on the adopted Policies Map, the Site lies along a Green Route and would result in the removal of some hedgerow and other vegetation to facilitate the vehicle access.

5.5 Policy CC03: Green Infrastructure, Trees and Landscaping of the MDD Local Plan is therefore of relevance. This policy sets out that proposals should demonstrate how they have considered and achieved the following criteria:

*“a) Provide new or protect and enhance the Borough’s Green Infrastructure networks, including the need to mitigate potential impacts of new development*

*(...)*

*d) Protect and retain existing trees, hedges and other landscape features.*

*(...)*

3. *Development proposals which would result in the loss, fragmentation or isolation of areas of green infrastructure will not be acceptable*.

5.5.1 Draft Policy NE4: Trees, woodland, hedges and hedgerows requires development proposals to ensure that existing pattern of fields, hedges and hedgerows and other landscape features are retained.

5.5.2 A Tree Survey Report (ref. L017 Arborfield Trunk Main) is submitted with the application. This Tree Survey Report assesses all trees along the pipeline for the Project, including along Barkham Road.

5.5.3 The hedgerow that runs along the north of the Site, which is to be removed, is considered in the Tree Survey Report. This stretch of hedgerow has been classified as a Category 'C' hedgerow. Category 'C' trees and hedgerows are defined as being of relatively low quality and would not normally be considered as a significant constraint to future development. As such, the removal of part of this hedgerow would not result in the loss of significant or important trees and hedgerow.

5.5.4 As mentioned in the 'Planning History' section above, the site where the proposed temporary construction compound will be was previously used as a construction compound for works to the Barkham Road bridge, with the same access as the one proposed in this application. For this original access to be created, the existing hedgerow and other vegetation would have been removed. There has been vegetation regrowth at the Site. Historical aerial imagery shows that the hardstanding from the previous site access was still present in 2023. Therefore, it is likely that the regrowth is approximately 2 years old, so is not considered mature and thus could be easily removed.

5.5.5 Also, the Proposed Development would be temporary and would be used for a period of two years. Once the construction of the Project has been completed, the construction site compound, and the Proposed Development, would be removed. Therefore, any regrowth could occur, as has been seen on the Site previously, over a relatively short period of time.

5.5.6 Overall, given the relatively low quality, the recent regrowth and the temporary nature of the Proposed Development, the Proposed Development would not result in significant harm to the green infrastructure network. As such, there would not be a significant conflict with Policy CC03 of the MDD Local Plan and draft policy NE4 of the LPU.

## 5.6 Ecology and biodiversity

5.6.1 Policy CP3: General Principles for Development of the Core Strategy states that planning permission will be granted for proposals that "*maintain or enhance the ability of the site to support fauna and flora including protected species*" (part d).

5.6.2 Policy CP7: Biodiversity of the Core Strategy states that development which may harm habitats or species of principal importance for nature conservation will only be permitted if it has been clearly demonstrated that the need for the development outweighs the need to safeguard the nature conservation importance.

5.6.3 Policy TB23: Biodiversity and Development of the MDD Local Plan sets out that planning permission will be granted for proposals where they comply with Policy CP7 of the Core Strategy and where they demonstrate how they "*provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing (...)*".

5.6.4 Draft Policy NE1: Biodiversity and Geodiversity of the LPU requires development proposals to "*protect and enhance biodiversity and geodiversity features of conservation value*".

5.6.5 The Site does not lie within any sites designated for nature conservation at an international, national or local level. It lies within the amber risk zone for Great Crested Newts (GCNs). A GCN Statement has been produced to support the application.

### Great Crested Newts

5.6.6 A GCN Statement and Precautionary Method of Works has been prepared to support the planning application.

5.6.7 There is a waterbody approximately 35 m to the east of the Site, which presents some suitability for GCNs, though this is considered to be low suitability due to the use of this waterbody as a balancing

pond, which means the presence of water is temporary and sporadic. However, as a precaution, GCNs are considered to potentially be present within the terrestrial habitat within the Site, limited to the hedgerow and grassland immediately south of the hedgerow.

5.6.8 This GCN Statement sets out that without mitigation measures, the Natural England rapid risk assessment demonstrates that the Proposed Development would result in 'Red: Offence Highly Likely'. However, if the Natural England avoidance measures are applied, this risk to GCNs changes to 'highly unlikely'.

5.6.9 Section 4 of the GCN details the mitigation measures that will reduce the risk to GCNs and the Precautionary Method of Works. These measures should be implemented by a suitably qualified ecologist (SQE) and the SQE will need to be present during vegetation clearance and removal of the post and wire fence. The SQE will check the area or the post and wire fence for great crested newt prior to removal, remain present during the removal of the post and wire fence, check holes from removal of the fence prior to filling in, be present during stage two-stage clearance of vegetation and be present during excavations.

5.6.10 Overall, considering the low probability of GCNs being present on the Site and the Precautionary Method of Works, the proposed impact on GCNs is considered to be low as long as the mitigation measures set out in the GCN Statement are complied with. Therefore, there would not be a conflict with Policy CP3 and CP7 of the Core Strategy, Policy TB23 of the MDD Local Plan and draft policy NE1.

## Biodiversity Net Gain

5.6.11 Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). All development, both major and minor, must deliver a 10% BNG, which means that a development will result in more or better-quality natural habitat than there was before development.

5.6.12 Certain developments are exempt from delivering the mandatory BNG, as per the 'de minimis' exemption. As stated in The Biodiversity Gain Requirements (Exemptions) Regulations 2024, development that does not impact an on-site priority habitat and meets the following criteria are exempt from BNG requirement:

- No priority or irreplaceable habitat will be affected
- The development impacts less than 25 m<sup>2</sup> (5 x 5 metres) of on-site habitat
- The development impacts less than 5 metres of on-site linear habitats such as hedgerows

5.6.13 The BNG metric has been completed and has been submitted alongside the planning application. This metric determined that no priority or irreplaceable habitats are present on the Site and therefore would not be impacted. Also, the Site is comprised of modified grassland and existing hardstanding. The area grassland removed would equate to 16.38 m<sup>2</sup>, so less than 25 m<sup>2</sup> would be affected. The Site contains hedgerow, which would be removed, but the length of the hedgerow to be removed would be 4.98 m<sup>2</sup>, so less than 5 m<sup>2</sup> of linear hedgerow. Therefore, the Proposed Development would meet the 'de minimis' exemption criteria and no further information is required. A letter of exemption has been prepared by the AECOM Ecology team to support these conclusions and has been submitted as part of the application.

5.6.14 Due to the hedgerow not being identified as priority habitat and due to the loss of this hedgerow being temporary, with the hedgerow being reinstated to a similar or higher quality once the Proposed Development is no longer required, the temporary loss of this hedgerow is not expected to result in significant harm to protected species and would not conflict with Policies CP3 and CP7 of the Core Strategy, Policy TB23 of the MDD Local Plan and draft policy NE1 of the Emerging Local Plan Update.

## 5.7 Flooding and drainage

5.7.1 Part 9 of Policy CP1 of the Core Strategy sets out that development should avoid increasing risks of or from all forms of flooding.

5.7.2 Policy CC09: Development and Flood Risk (from all sources) of the MDD Local Plan sets out that all sources of flood risk must be taken into consideration at all stages and to the appropriate degree at all levels in the planning application process to avoid inappropriate development in areas at risk of flooding.

5.7.3 The Site lies within Flood Zone 1 and is at low risk of surface water flooding. The Proposed Development would involve the addition of a small area of hard standing, which would be approximately 24.7 m<sup>2</sup> and would be made of concrete. The vehicle access would be temporary, and any hard standing would be removed once the access is no longer required. Therefore, considering the low risk of flooding, minor scale and the temporary nature of the development, the Proposed Development is unlikely to conflict with Policy CP1 of the Core Strategy and Policy CC09 of the MDD Local Plan and would not result in a significant increase in flood risk.

## 5.8 Highway safety

5.8.1 Policy CP6: Managing Travel Demand of the Core Strategy sets out that permission will be granted for schemes that:

*f) enhance road safety; and*

*g) do not cause highway problems or lead to traffic related environmental problems”*

5.8.2 Visibility splay drawings (ref L017-IL-XX-200-DR-CE-0003) have been provided as part of the application. These drawings show that the Proposed Development would comply with the required visibility splays.

5.8.3 The Proposed Development would provide a secondary vehicle access to the proposed temporary construction compound. This would mean that construction vehicles would have one way movement in to and out of the construction compound, which would reduce the need for vehicles reversing onto or turning around on Barkham Road. Therefore, this would help to ensure that road safety is maintained and would not cause significant highway problems.

5.8.4 As set out in section 3.3 above, there was previously an access in this location that was installed under permitted development rights. Therefore, a precedent for a vehicle access in this location been established.

5.8.5 Therefore, the Proposed Development would not result in harm to road safety and would not cause significant highway or traffic problems and thus would accord with Policy CP6 of the Core Strategy.

## 6. Conclusion and Planning Balance

6.1.1 The Proposed Development is the construction of a vehicle access, which would facilitate one way access through a temporary construction compound, required to support the construction of a clean water network reinforcement which will provide vital infrastructure for approximately 2000 new homes in the allocated Arborfield Garrison site.

6.1.2 The Applicant, Thames Water, is the statutory clean water undertaker for the Arborfield and Barkham areas and has a duty to provide a clean water network to the area and the Arborfield Garrison site.

6.1.3 The Site is within the designated countryside, but does not have any ecological, landscape or heritage designations.

6.1.4 The Proposed Development would not threaten the separate identity of settlements and the countryside and would maintain the quality of the environment: the location of the Proposed Development within the countryside therefore accords with Core Strategy Policy CP11 and would be acceptable in principle.

6.1.5 There would be the loss of hedgerow to facilitate the construction of the Proposed Development, but the hedgerow to be removed is of low quality (as set out in the Tree Survey Report) and any loss would be temporary (for a period of two years), with replacement planting to be provided. It is therefore considered that the Proposed Development would not result in significant harm to the green infrastructure network and to the character of the local area, in accordance with Policy CP1 and Policy CP3 of the Core Strategy, Policy IRS2 of the Arborfield and Barkham Neighbourhood Plan and Policy CC03 of the MDD Local Plan.

- 6.1.6 There would be limited impact on great crested newts subject to compliance with the Precautionary Method of Works and the Biodiversity Net Gain assessment has not identified any priority habitats that would be lost and confirmed that the Proposed Development would be exempt from providing 10% BNG.
- 6.1.7 The Proposed Development would promote a safer way for construction vehicles to enter and leave the proposed temporary construction compound, so the Proposed Development accords with Policy CP1 and Policy CP6 of the Core Strategy and Policy CC09 of the MDD Local Plan.
- 6.1.8 Overall, this planning statement clearly demonstrates how the Proposed Development is in accordance with the Development Plan and other relevant national policy. The development of a temporary vehicle access is supported in principle at this location by the WBC Core Strategy and MDD Local Plan, and therefore the presumption in favour of sustainable development should apply as per Policy CC01: Presumption in Favour of Sustainable Development and paragraph 11 of the NPPF, pointing strongly in favour of the grant of planning permission.

