

Land off Kirton's Farm Road, Reading

Planning Statement

30280066-AUK-XX-ZZ-TR-ZZ-0102-P002

August 2026

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1 Introduction

1.1 Context

- 1.1.1 This Planning Statement has been prepared by Arcadis Consulting (UK) Limited on behalf of M&G Real Estate (M&G) acting on behalf of Prudential Assurance Company Ltd (“the Client”). The need for the Proposed Development arises from Englefield Estate Trust Corporation Limited (“the Freeholders”) and the Client agreeing that it is appropriate to remove the previously imported soils and restore the landform. It supports a full planning application for the removal of previously imported soils currently stored on part of the Site, including enabling works, following by the restoration and reprofiling of the land to its original level (using indigenous material, placed elsewhere on the site) and condition for future agricultural use, as originally intended. The application relates to a site known as Land off Kirton’s Farm Road (hereafter ‘the Site’), National Grid Reference SU69706973, coordinates 469754 (Easting), 169714 (Northing).
- 1.1.2 The Site is located within the administrative areas of both Wokingham Borough Council and West Berkshire Council. As most of the Site sits within Wokingham Borough Council’s boundary, the planning application will be submitted to Wokingham and West Berkshire will be formally consulted. This approach was agreed at the pre-application meeting held between Arcadis, Wokingham Borough Council and West Berkshire Council on 22nd January 2026.

1.2 Supporting Documentation

- 1.2.1 The planning submission has been prepared in accordance with national and local planning application validation requirements and in response to the pre-application advice received on 29th January 2026 (West Berkshire Council) and 9th February 2026 (Wokingham Borough Council). As required, the planning submission includes documents and plans listed in Table 1.

Table 1 - Supporting documents

Document	Drawing Reference/ Prepared by
Application Form and Certificates	-
Community Infrastructure Levy (CIL) Form	-
Covering Letter	Arcadis Consulting (UK) Ltd
Application Drawings	
Site Location Plan	30280066-AUK-XX-ZZ-DR-ZZ-0057-P002 Rev 2
Site Context Plan	30280066-AUK-XX-ZZ-DR-ZZ-0055-P001
Existing Site Plan	30280066-AUK-XX-ZZ-DR-ZZ-0079-P001 Rev 1

Document	Drawing Reference/ Prepared by
Proposed Site Plan	30280066-AUK-XX-ZZ-DR-ZZ-0080-P002 Rev 2
Interpolated Original Ground Elevation	30280066-AUK-XX-ZZ-DR-ZZ-0081-P001 Rev 2
Proposed Ground Elevation	30280066-AUK-XX-ZZ-DR-ZZ-0082-P002 Rev 2
Cross Section Plan	30280066-AUK-XX-ZZ-DR-ZZ-0083-P001 Rev 1
Application Documents	
Planning Statement	30280066-AUK-XX-ZZ-TR-ZZ-0102-P002 / Arcadis Consulting (UK) Ltd
Arboricultural Impact Assessment	30280066-AUK-XX-ZZ-TR-ZZ-0060-P001 / Arcadis Consulting (UK) Limited
Phase 1 Preliminary Risk Assessment Report	30250853-AUK-XX-ZZ-TR-ZZ-0004-P003 / Arcadis Consulting (UK) Limited
Preliminary Ecological Appraisal and Biodiversity Net Gain Report	30280066-AUK-XX-ZZ-TR-KK-0052-P002 / Arcadis Consulting (UK) Limited
Biodiversity Net Gain Metric	Arcadis Consulting (UK) Limited
Flood Risk Assessment	30280066-AUK-XX-ZZ-TR-ZZ-0054-P002 / Arcadis Consulting (UK) Limited
Cultural Heritage Desk-Based Assessment	30280066-AUK-XX-ZZ-TR-HI-0045-P002 / Arcadis Consulting (UK) Limited
Landscape and Visual Appraisal	30280066-AUK-XX-ZZ-TR-LV-0046-P002 / Arcadis Consulting (UK) Limited
Outline Construction Environmental Management Plan	30280066-AUK-XX-ZZ-TR-ZZ-0073-P002 / Arcadis Consulting (UK) Limited
Indigenous Material Sampling Report	30280066-AUK-XX-ZZ-TR-ZZ-0027-P004 / Arcadis Consulting (UK) Limited
Transport Statement	30280066-AUK-XX-ZZ-TR-ZZ-0076-P003 / Arcadis Consulting (UK) Limited
Outline Construction Logistics Plan	30280066-AUK-XX-ZZ-TR-ZZ-0084-P002 / Arcadis Consulting (UK) Limited

1.3 Structure

1.3.1 The structure of this planning statement is set out as follows:

- Section 2 - provides details on the background and need for the project
- Section 3 – provides a description of the application site and its surroundings, along with a summary of the relevant environmental and land use designations and planning history
- Section 4 – sets out the pre-application engagement
- Section 5 – details the Proposed Development
- Section 6 – sets out the relevant national and local planning policy context, along with other relevant material considerations
- Section 7 – considers the extent to which the Proposed Development complies with relevant policy and guidance
- Section 8 – provides conclusions on the overall compliance of the Proposed Development with planning policy and guidance

2 Background and Need

2.1 Background

- 2.1.1 The Site has historically formed part of a wider agricultural landholding, although it is understood part of the land has been occupied for over 20 years by soils placed in connection with nearby development activity. The land is currently vacant and characterised by scrub and vegetation growth. The submitted application has therefore been brought forward to provide a clear planning basis for the removal of the previously imported soils and the restoration and reprofiling of the land to a condition suitable for future agricultural use.
- 2.1.2 The Site has been affected by the relocation of indigenous material and the subsequent placement of imported soils, which have remained on the Site since the early 2000s. Technical investigations undertaken over a number of recent years have sought to establish the nature and condition of these materials, including intrusive investigations and laboratory testing which confirmed the previously imported soils as locally sourced and inert. More recently, the Client has reviewed the long-term management of the Site and agreed that the imported materials should be removed, and the land restored, as close as possible, to its original condition. To inform the application, a range of technical assessments have been undertaken to consider matters including flood risk, contaminated land, landscape and visual effects, cultural heritage, soils and transport. The proposals have also been subject to pre-application engagement with Wokingham Borough Council and West Berkshire Council, with technical and environmental considerations informing the proposed restoration strategy.

2.2 Need for development

- 2.2.1 The Proposed Development involves the removal of the previously imported soils (approximately 18,000 m³) currently stored on part of the Site, including required enabling works, followed by the restoration and reprofiling of the land as close as possible to its original level (using only indigenous material, placed elsewhere on the site only) and condition for future agricultural use, as originally intended.
- 2.2.2 The proposal would deliver a long-term improvement to the Site by removing the imported materials and restoring the land to a condition that is more consistent with its surrounding countryside setting. The Proposed Development therefore represents an opportunity to restore the Site whilst ensuring that all removed materials are managed appropriately and in accordance with relevant environmental requirements.

3 The Site and Surrounding Area

3.1 Site Location and Surroundings

- 3.1.1 The Site is located off Kirton's Farm Road. National Grid Reference SU69706973, coordinates 469754 (Easting), 169714 (Northing). The Site sits within both administrative boundaries of Wokingham Borough Council (on the east) and West Berkshire Council (on the west). The administrative boundary of Reading Borough Council abuts the eastern boundary of the Site.
- 3.1.2 The Site covers approximately 2.4 hectares of land historically associated with agricultural use (0.8 hectares within West Berkshire's boundary and 1.6 hectares within Wokingham's boundary). The Site currently comprises mainly disused scrubland with a landscape mix of grassland, bramble scrub and tall vegetation, which is regularly maintained at a low height. The central and eastern areas contain previously imported soils, largely composed of local materials with a distinct minor area of construction and demolition debris, while the western part contains original surficial site soils (indigenous material) that were relocated prior to the importation of soils. The approximate extents of the previously imported soils and indigenous material are shown on Figure 3.1. External boundaries of the Site are defined by a willow-lined ditch to the south, trees and mixed scrub to the north and east, and a railway embankment to the west. There is an existing access from Kirton's Farm Road to the north east of the Site.



Figure 3.1: Approximate extents of previously imported soils and indigenous material

- 3.1.3 The surrounding environment includes residential and commercial properties to the north and east, disused land, freshwater lakes, and a railway line to the west. Grassland is located to the immediate north and south. The M4 motorway is located approximately 170 metres south of the Site.

- 3.1.4 In terms of constraints the Site is designated as open countryside. It does not contain any listed buildings, although it is located approximately 500 metres from Kirtons Farmhouse, a Grade II listed building. There are no public rights of way crossing the Site. National Cycle Route 23 travels northwards on Kybes Lane, then on to Kirton's Farm Road, passing immediately adjacent to the eastern Site boundary, before turning east and continuing eastwards through Reading Green Park Business Park.
- 3.1.5 Ecologically, the Site is affected by the presence of Japanese Knotweed in a small discrete area on the northern boundary. The Site also contains an ancient tree; however, the Arboricultural Impact Assessment (AIA) confirms that no trees within the survey boundary are subject to Tree Preservation Orders (TPOs) or Conservation Area restrictions. There are no statutory environmental or ecology designations within a 10-kilometre radius.

3.2 Planning History

- 3.2.1 In relation to the Site itself, there is no relevant planning history on the Council's website. It is understood part of the land has been occupied for over 20 years by soils placed in connection with nearby development activity. The historical use of the Site and surrounding area was determined from inspection of OS maps and satellite imagery from Google Maps. This shows the Site as undeveloped agricultural land from 1872 to 1993 (most recent available map) and it is estimated between 2003 and 2006, the placement of imported soil on the eastern portion of the Site took place. It is therefore considered for the purposes of this planning application that the lawful use of the Site is as agricultural land.

4 Pre-application Engagement

4.1 Pre-application request

- 4.1.1 A request for pre-application advice was submitted to West Berkshire Council and Wokingham Borough Council (the Councils) on 4th November 2025 with a response received on 29th January and 9th February 2026. Both Councils confirmed that the proposed development is acceptable in principle. The authorities recognised the environmental and landscape benefits associated with removing the previously imported soils from the Site and restoring the land to a more natural landform. Neither authority raised any in-principle objections in relation to landscape, ecology, flood risk, highways, archaeology or amenity, subject to the submission of appropriate technical assessments and mitigation measures. As most of the Site sits within Wokingham Borough Council's boundary, the planning application will be submitted to Wokingham and West Berkshire will be formally consulted. This approach was agreed at the pre-application meeting held between Arcadis, Wokingham Borough Council and West Berkshire Council on 22nd January 2026.

4.2 Environmental Impact Assessment

- 4.2.1 An EIA Screening Request is being submitted concurrently with the planning application. The Proposed Development is not considered to fall within Schedule 1 or Schedule 2 of the EIA Regulations and, therefore, an Environmental Impact Assessment (EIA) is not required.

4.3 Pre-application Engagement

- 4.3.1 The pre-application response from the Councils in relation to engagement recommended a proportionate approach to engagement with Parish Councils, with feedback received to be considered within the planning application.
- 4.3.2 The consultation undertaken reflects national planning guidance encouraging applicants to engage with communities affected by development proposals and is proportionate to a temporary restoration scheme that does not involve new built development, permanent operational impacts or significant changes to land use.
- 4.3.3 As part of the consultation, letters were issued to Burghfield Parish Council and Shinfield Parish Council on Thursday 23rd July, inviting comments on the proposals. The letters detailed the background, proposed development, environmental considerations, and the next steps. A response period was provided until Friday 7th August. During this period, no comments or objections were received from the Parish Councils.

5 The Proposed Development

5.1.1 The Proposed Development involves the removal of previously imported soils (approximately 18,000m³) currently stored on part of the Site, including required enabling works, followed by the restoration and reprofiling of the land to its original level using only indigenous material placed elsewhere on the Site. The objective is to address the long-term presence of the imported soils and restore the land to a condition suitable for future agricultural use.

a) Enabling works

The enabling works required to facilitate construction are proposed to include:

- Provision of a temporary construction access from Kirton's Farm Road (utilising the existing access), including associated visibility splays (of 43m north and 43m south of the proposed access).
- Limited vegetation clearance within the working area (i.e. the previously imported soil relocation area) of the Site and to facilitate the proposed site access. Other vegetation close to the working area will not be removed but may be subject to light pruning for a safe working area.
- Pruning of vegetation associated with the visibility splays to ensure safe access to and from the Site throughout the construction period.

b) Soil Removal

- Careful removal of all previously imported soils, including both imported materials and a minor area containing demolition rubble.
- Removal of a single stand of Japanese Knotweed under an appropriate Japanese Knotweed Management Plan.
- Materials management: the previously imported soils will be removed from the Site, managed under the appropriate Duty of Care and transported to a facility that has relevant authorisation to accept the soils.

c) Land Restoration

- Regrading and levelling: Once the previously imported soils are removed, the land will be reprofiled using the indigenous materials to tie in to surrounding field levels, ensuring a consistent and even surface as close as possible to the original levels and condition for future agricultural use, as originally intended. Reinstatement of bund at site access on completion of works.

d) Compliance and Best Practice

- All works will adhere to the latest technical surveys and comply with relevant planning and environmental standards.
- The project will fully observe legal and regulatory requirements, including the Duty of Care for soil removal.

e) Planning Context

- The proposed soil removal, regrading using only indigenous material, and restoration constitutes operational development under the Town and Country Planning Act 1990.

- The primary objective is to safely and efficiently return the land to its original state, delivering environmental and community benefits consistent with current planning policies.

5.1.2 The need for the Proposed Development arises from the Freeholders and M&G agreeing that it is appropriate to remove the previously imported soils and restore the landform. This would provide a clear planning basis for addressing the Site's current condition.

5.2 Construction Phase

- 5.2.1 An Outline Construction Environmental Management Plan (OCEMP) and an Outline Construction Logistics Plan (OCLP) have been prepared by Arcadis and submitted as part of this planning application. Following the receipt of planning approval, the OCEMP and OCLP will then be updated by the Contractor to a full Construction Environmental Management Plan (CEMP) and a Construction Logistics Plan (CLP) which will be in accordance with the OCEMP and OCLP. The OCEMP details that the works are scheduled to begin in 2027 and last approximately 7 months. A detailed construction programme and phasing plan will be included within the CEMP.
- 5.2.2 The OCEMP establishes minimum standards and procedures for managing and minimising, as far as is reasonably practicable, the environmental impacts of the Proposed Development. The purpose of an OCEMP is to develop, maintain, implement, monitor, and improve environmental control procedures in accordance with the relevant legal and regulatory requirements, contract specification and the relevant Contractor Business Management System complying with ISO 14001:2015.
- 5.2.3 The OCEMP has been prepared to enable general health and safety issues relating to the environment as well as environmental effects of the works to be minimised and that the project is undertaken in a responsible manner in line with current industry best practice, and at the same time minimising harm and the disruption to the surrounding environment, including businesses, residents, visitors and members of the public. The CEMP will be developed prior to works commencing.
- 5.2.4 The OCLP objective is to minimise the impact of construction related vehicle movements and facilitate the sustainable construction travel to the Site. The Contractor will be responsible for developing the OCLP to a CLP once the construction programme has been finalised. The Contractor will also be responsible for implementing, maintaining and enforcing all site management, traffic management and mitigation measures set out within the CLP throughout the duration of the works, ensuring compliance with all relevant approvals, health and safety requirements, and statutory obligations. A temporary site compound will be established within the Site boundary to accommodate welfare facilities, staff parking, storage areas and operational space associated with the Proposed Development. The detailed design, layout and operation of the site compound will be developed by the appointed Contractor and incorporated into the CLP prior to the commencement of works.

6 Planning Policy Context

- 6.1.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) require that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.1.2 For the purposes of the Section 38(6) the Development Plan for the Site comprises of the following documents:

West Berkshire Borough Council

- West Berkshire Local Plan Review 2023 to 2041 (adopted June 2025); and
- Minerals and Waste Local Plan (2022-2037) (adopted December 2022).

Wokingham Borough Council

- Adopted Core Strategy Development Plan Document 2010 (CSDPD) (adopted January 2010);
- Adopted Managing Development Delivery Local Plan (MDDLDP) (adopted February 2014); and
- Joint Minerals and Waste Plan (adopted January 2023).

- 6.1.3 According to Wokingham Borough Council's Policies Map, the Site is within a Core Employment Area and an Archaeological Site. The West Berkshire Policies Map, defines the Site as a designated rural area and within Flood Zones 2 and 3. The Site also sits within a mineral safeguarding area (Wokingham Minerals and Waste Plan and West Berkshire Minerals and Waste Local Plan).

6.2 Development Plan

West Berkshire Borough Council

West Berkshire Local Plan Review 2023 to 2041

- 6.2.1 The West Berkshire Local Plan Review sets out the council's main planning approach and policies for West Berkshire. It sets out the development needed to meet local requirements up to 2041, establishes the strategy for how development will be distributed across the District, and includes policies to protect, conserve and enhance the natural, built and historic environment. It also supports communities in West Berkshire in delivering sustainable development. The following policies are relevant considerations for this planning application.
- 6.2.2 **Policy SP1: Spatial Strategy** - Sets out the overarching spatial strategy for West Berkshire, directing development to areas of lower environmental value, promoting the efficient use of previously developed land and ensuring development makes the best use of land whilst conserving and enhancing the District's built, historic and natural environment. The policy supports sustainable patterns of development, focuses growth within defined settlements and applies greater restrictions to development in the open countryside.

- 6.2.3 **Policy SP6: Flood Risk** - States that development will be directed to areas at lowest flood risk through application of the sequential approach and will only be supported in higher risk areas where it is demonstrated that there are no reasonably available sites at lower risk. Development must be safe for its lifetime, avoid increasing flood risk elsewhere, and account for climate change, with only water-compatible and essential infrastructure permitted in the functional floodplain (subject to the exception test where required).
- 6.2.4 It requires proposals to avoid impeding flood flows, maintain or enhance floodplain capacity, and not exacerbate flooding, while providing safe access and long-term management of mitigation measures. Site-specific Flood Risk Assessments are required in defined circumstances, and development must incorporate sustainable drainage systems to manage surface water, restrict run-off where feasible, and support environmental enhancement.
- 6.2.5 **Policy SP8: Landscape Character** - Relates to achieving landscape-led development that conserves and enhances the District's distinctive landscape character. Development must consider the natural, cultural and perceptual components of the landscape as a whole, and respond to its key features, sensitivity to change, and existing settlement pattern, scale and character. Proposals should be informed and respond positively to the evaluation of the distinctive landscape character areas and supported by a proportionate landscape assessment.
- 6.2.6 **Policy SP10: Green Infrastructure** - Development proposals should protect or enhance existing green infrastructure, create new integrated green infrastructure, and maximise opportunities for multi-functional benefits.
- 6.2.7 **Policy SP9: Historic Environment** - States that the historic environment should be conserved, enhanced and enjoyed, with development sustaining and strengthening the District's distinctive historic character and sense of place. Development must protect and, where appropriate, enhance designated and non-designated heritage assets, including their setting, and respond positively to their archaeological, architectural and historic significance. Proposals should maximise opportunities to preserve or better reveal significance, justify any harm in line with the asset's importance, and be supported by proportionate heritage assessments, with findings informing high quality design and contributing to local character and distinctiveness.
- 6.2.8 **Policy SP11: Biodiversity and Geodiversity** - States that development should conserve and enhance biodiversity and geodiversity, securing their long-term management and delivering Biodiversity Net Gain where required. Development must protect habitats and species in proportion to their importance, avoid fragmentation, strengthen ecological connectivity, and incorporate biodiversity enhancements, including appropriate buffers and control of invasive species. Proposals should follow a clear mitigation hierarchy (avoid, mitigate, compensate), safeguard designated and irreplaceable habitats, and demonstrate compliance with relevant conservation strategies, with ecological considerations integrated into design to support resilient habitat networks and wider green infrastructure.
- 6.2.9 **Policy DM14: Assets of Archaeological Importance** - Requires development proposals affecting archaeological assets to demonstrate why the development is necessary, assess the significance of any archaeological remains, and show how that significance will be preserved. Where archaeological assets or potential are identified, appropriate archaeological assessments and, if necessary, further field investigations must be undertaken. The policy seeks to prioritise the preservation of significant

archaeological remains in situ and, where this is not possible, requires their investigation, recording and archiving in accordance with an approved Written Scheme of Investigation.

- 6.2.10 **Policy DM15: Trees, Woodland and Hedgerows** – Supports development proposals that conserve and enhance trees, woodland and hedgerows, supported by appropriate arboricultural assessments where necessary. Existing trees, woodland and hedgerows should be incorporated into the design wherever possible, with any losses fully justified and compensated through replacement planting and long-term maintenance measures. The policy also requires protection of retained vegetation during construction and seeks to safeguard irreplaceable habitats such as ancient woodland, veteran trees and ancient hedgerows, while encouraging opportunities for new planting and habitat creation.
- 6.2.11 **Policy DM35: Sustaining a Prosperous Rural Economy** - States that development should support and sustain a prosperous rural economy, with proposals in the countryside required to make a positive contribution to economic growth and be appropriate to a rural location. Development must be compatible with surrounding uses, avoid unjustified expansion into the open countryside, and demonstrate high quality design that respects the character and setting of the rural landscape. Proposals should limit impacts on rural roads and heritage assets, promote the use of previously developed land, and ensure that the loss of existing business uses is only permitted where it can be clearly justified without harming the vitality and viability of the local rural economy.

Minerals and Waste Local Plan (2022-2037)

- 6.2.12 **Policy 9:** States that minerals resources and associated infrastructure should be safeguarded from sterilisation by non-mineral development. Development within Minerals Safeguarding Areas must avoid prejudicing the extraction of mineral resources or the operation of minerals infrastructure, unless it can be demonstrated that the resource is not viable, prior extraction can take place, or the need for development outweighs the need to safeguard the resource. Proposals should ensure that minerals can be conserved or utilised where appropriate and only permit development where impacts on safeguarded resources and infrastructure are acceptable or justified.

Supplementary Planning Documents (SPDs)

- 6.2.13 Sustainable Drainage SPD – SuDS features will be included to control surface water and support wider environmental objectives.

Wokingham Borough Council

Core Strategy Development Plan Document 2010

- 6.2.14 **CP1: Sustainable Development** - States that development should deliver sustainable development, maintaining and enhancing environmental quality while minimising pollution and impacts on water, land and amenity. Development must use resources efficiently, incorporate sustainable drainage, avoid high quality agricultural land and areas at risk of flooding or noise impacts, and provide safe, accessible and adaptable design. Proposals should reduce the need to travel, support low-carbon development through energy efficiency and renewable energy measures, and demonstrate how layout, form and design contribute to minimising energy and water consumption.
- 6.2.15 **CP3: General Principles for Development** – Promotes development that meets high-quality design principles while protecting environmental, ecological and landscape features. Development must be

appropriate in scale, layout and character, avoid harm to landscape, ecological, heritage and water environments, and maintain or enhance biodiversity including habitats and species. Proposals should respect local character, integrate effective landscaping, safeguard amenity, and demonstrate a clear and well-considered design response through supporting plans and documentation

- 6.2.16 **CP7: Biodiversity** - States that sites of international and national importance for biodiversity should be conserved and enhanced, with strong protection applied according to their status. Development must avoid harm to designated sites, priority habitats and species, and important landscape features for wildlife, and should not undermine biodiversity action plans. Proposals that may cause harm will only be permitted where the need clearly outweighs the importance of conservation, no less harmful alternatives exist, and impacts are appropriately addressed through mitigation or, as a last resort, compensation measures.
- 6.2.17 **CP11: Proposals Outside Development Limits (including countryside)** - States that development outside defined development limits should be strictly controlled to protect the countryside and maintain settlement character. Development must support sustainable rural activities or community needs, avoid encroachment into the open countryside, and remain appropriately scaled and located within or adjoining existing buildings. Proposals should deliver environmental improvements where relevant, ensure that extensions or replacements do not disproportionately increase the size or impact of buildings, and only permit development where it is justified, well-related, and does not undermine the quality of the rural environment.
- 6.2.18 **Policy CP15: Employment Development** - supports business, industrial and warehousing development within Wokingham Borough's designated Core Employment Areas, including the expansion and intensification of existing employment uses. Outside these areas but within development limits, the redevelopment, refurbishment and minor extension of employment premises are acceptable in principle. The policy seeks to maintain the overall stock of employment floorspace, provide a range of premises to meet business needs, and ensure that employment development is supported by appropriate mitigation for impacts on housing demand, labour and skills, and the local transport network.

Managing Development Delivery Local Plan

- 6.2.19 **Policy CC01: Presumption in Favour of Sustainable Development** - States that there is a presumption in favour of sustainable development, where proposals that accord with the Development Plan should be approved without delay. Where relevant policies are absent or out of date, development will be permitted unless adverse impacts significantly and demonstrably outweigh the benefits, or specific national policy indicates that development should be restricted.
- 6.2.20 **Policy CC02: Development Limits** - Requires development to be located within defined settlement boundaries. Development at the edge of settlements must respect the transition between the built-up area and countryside, taking account of the character of the surrounding landscape. Development within Strategic Development Locations (SDLs) must accord with approved masterplanning and infrastructure delivery requirements to ensure necessary infrastructure is provided.
- 6.2.21 **Policy CC03: Green Infrastructure, Trees and Landscaping** - States that development should demonstrate how they can protect, enhance and deliver a connected network of green infrastructure, including trees and landscaping. Development must retain existing vegetation and landscape features, promote ecological and recreational linkages, and integrate with surrounding open space

and countryside. Proposals should incorporate high quality planting, avoid fragmentation of green infrastructure, and where relevant support river corridor enhancements and measures that contribute to flood risk reduction.

- 6.2.22 **Policy CC09: Development and Flood Risk** - Requires that development must carefully manage and mitigate flood risk from all sources, ensuring that inappropriate development in flood risk areas is avoided. Development must be directed to areas of lowest risk through the sequential approach, avoid increasing flood risk elsewhere, and incorporate mitigation measures where necessary. Proposals in higher risk areas should only be permitted in exceptional circumstances where wider sustainability benefits outweigh the risk, the development is safe for its lifetime, and resilient design measures are included, supported by appropriate flood risk assessments where required.
- 6.2.23 **Policy CC10: Sustainable Drainage** - States that development should manage surface water sustainably, ensuring runoff is controlled in a way that reflects greenfield conditions where possible. Development must incorporate Sustainable Drainage Systems (SuDS), reduce runoff rates and volumes, and avoid adverse impacts on drainage infrastructure, while providing clear arrangements for their long-term maintenance. Proposals should be supported by appropriate drainage strategies or flood risk assessments, demonstrating that surface water is managed effectively and sustainably.
- 6.2.24 **Policy TB11: Core Employment Areas** – Core Employment Areas are defined on the Policies Map.
- 6.2.25 **Policy TB21: Landscape Character** - States that development should be informed by landscape character assessments, ensuring proposals address landscape quality, sensitivity and key issues. Development must retain or enhance the condition, character and features that contribute to the landscape, demonstrating a clear and positive response to the area's distinctive character.
- 6.2.26 **Policy TB23: Biodiversity and Development** - Sets out that development affecting biodiversity must comply with wider biodiversity policy requirements and demonstrate clear ecological benefits. Development must incorporate new or enhanced biodiversity features, provide appropriate buffer zones to protect designated sites, habitats and species, and ensure ecological connectivity through continuous wildlife corridors. Proposals should integrate with the wider green infrastructure network and support a permeable and resilient ecological system.
- 6.2.27 **Policy TB24: Designated Heritage Assets (Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments and Conservation Areas)** - Sets out that designated heritage assets and their settings should be conserved and enhanced, ensuring development protects their character, significance and historic interest. Development must demonstrate that proposals at least preserve and, where possible, enhance the architectural, historic and landscape qualities of heritage assets, including their setting and views. Proposals should retain important historic features, support improvements to assets (particularly those at risk), and positively contribute to local character and heritage significance.
- 6.2.28 **Policy TB25: Archaeology** - States that areas of archaeological potential should be identified and protected, with development required to assess impacts on archaeological remains. Development must prioritise preservation in situ where possible, and where this is not feasible, ensure that remains are appropriately excavated, recorded and archived to safeguard their significance.

Joint Minerals and Waste Plan

- 6.2.29 **Policy M2: Safeguarding Sand and Gravel Resources** – Non-minerals development in the Minerals Safeguarding Area may be permitted if it can be demonstrated through the presentation of a Mineral Resources Assessment, that the option of prior extraction has been fully considered as part of an application.

Draft Local Plan Update

- 6.2.30 The Wokingham Borough Local Plan Update 2023-2040 was submitted to the Secretary of State for examination on 28th February 2025.
- 6.2.31 **Policy SS1: Sustainable development principles** - requires development to contribute to identified needs whilst supporting sustainable travel, efficient use of land, high-quality design, climate change mitigation and adaptation, flood risk management, and healthy communities. Development should conserve and enhance heritage, landscape and biodiversity, avoid adverse environmental impacts, protect the separate identity of settlements, and ensure appropriate infrastructure is provided to support growth.
- 6.2.32 **Policy SS5: Development in the countryside** - seeks to protect the character and appearance of the countryside by restricting development to specific types that are appropriate to a rural location, such as agricultural, renewable energy and forestry development.
- 6.2.33 **Policy FD1: Development and Flood Risk** - requires development proposals to consider flood risk from all sources, including climate change impacts, and direct development to areas at the lowest risk of flooding. Proposals must demonstrate that flood risk will not be increased on-site or elsewhere and, where required, be supported by a site-specific Flood Risk Assessment. Development in flood risk areas will only be permitted where it is safe, incorporates appropriate mitigation measures, and satisfies the sequential and, where necessary, exception tests.
- 6.2.34 **Policy FD3: River Corridors and Watercourses** - Supports development that conserves and enhances the function, character, biodiversity and heritage value of rivers and watercourses, whilst protecting and improving public access, ecological networks and water quality. Development should provide appropriate buffer zones alongside watercourses and avoid culverting wherever possible.
- 6.2.35 **Policy NE1: Biodiversity and Geodiversity** - Supports development that protects and enhances biodiversity and geodiversity, avoids harm to designated sites, habitats and species, and provides appropriate ecological mitigation, compensation and long-term management where impacts cannot be avoided. Development should maintain and strengthen ecological networks, deliver biodiversity enhancements, and safeguard internationally, nationally and locally important ecological assets, with the highest level of protection afforded to irreplaceable habitats.
- 6.2.36 **Policy NE2: Biodiversity Net Gain** – Requires proposals to demonstrate a minimum biodiversity net gain of 10%
- 6.2.37 **Policy NE4: Trees, Woodland, Hedges and Hedgerows** - supports development that protects, retains and integrates existing trees, woodland, hedges and hedgerows within the landscape. Development should provide appropriate protection and buffering for these features, incorporate

additional planting where possible, and ensure that any unavoidable impacts are minimised and appropriately mitigated through replacement planting and long-term management.

- 6.2.38 **Policy NE5: Landscape and Design** - supports development that adopts a landscape-led approach, responds positively to local landscape character, and protects and enhances the distinctiveness of the area. Development should be informed by appropriate landscape assessment, incorporate high-quality landscaping and green infrastructure, provide appropriate transitions between urban and rural areas, and secure the long-term management of landscape features.

6.3 National Planning Policy

National Planning Policy Framework (NPPF)

- 6.3.1 The NPPF, first published in 2012 and most recently revised in August 2026, sets out the government's policies for plan-making and for making decisions on development proposals in England. It is a material consideration of critical importance in both contexts.
- 6.3.2 Policy DM3 sets out the approach to determining development proposals, requiring local planning authorities to work proactively with applicants, take a proportionate approach to the consideration of planning matters, and have regard to issues raised through engagement and consultation. The policy also encourages the use of planning conditions and obligations where appropriate to make development acceptable, and states that applications which accord with the development plan, the Framework and other material considerations should not be refused.
- 6.3.3 Policy S1 seeks to ensure that development plans support future growth and change by meeting identified development needs, including housing, business, infrastructure and other uses, unless there are strong policy or impact-based reasons to restrict development. It also seeks to promote sustainable patterns of growth and support measures that mitigate and adapt to climate change.
- 6.3.4 Policy S2 seeks to ensure that development plans set out a clear spatial strategy identifying where development should be located and where land should be protected or enhanced. This includes defining settlements and their boundaries, as well as identifying town centres and other areas where specific approaches to development apply.
- 6.3.5 Policy S3 states that decisions on development proposals should apply a presumption in favour of sustainable development.
- 6.3.6 Policy F4 requires site-specific Flood Risk Assessments (FRAs) to accompany development proposals within Flood Zones 2, 3a and 3b, and certain developments within Flood Zone 1, including sites of one hectare or more, land identified as having critical drainage problems, and land identified as being at risk of flooding. The policy requires FRAs to be proportionate to the scale, nature and location of the proposed development and to inform the assessment of flood risk and any necessary mitigation measures.
- 6.3.7 Policy P2 seeks to ensure that land is suitable for its proposed use by requiring consideration of ground conditions, including risks associated with contamination and land instability. The policy requires adequate site assessment information to inform the assessment of such risks and any necessary mitigation measures, and states that remediated land should not be capable of being

determined as contaminated land under Part IIA of the Environmental Protection Act 1990. Responsibility for securing a safe development on contaminated or unstable land rests with the developer and/or landowner.

- 6.3.8 Policy F7 seeks to ensure that development is safe from flooding and does not increase flood risk elsewhere. The policy requires development proposals to avoid risks to occupiers, users and visitors, and where development is proposed in areas at risk of flooding, it must be demonstrated that the development will be safe throughout its lifetime, that residual flood risk can be managed, that appropriate flood resilience and resistance measures are incorporated, and that flood risk will not be increased elsewhere. The policy also requires the most vulnerable forms of development to be located in areas of lowest flood risk within a site, unless there are overriding reasons for an alternative arrangement.
- 6.3.9 Policy N1 seeks to safeguard and enhance the natural environment by ensuring development is informed by relevant environmental evidence and strategies. The policy promotes the conservation, enhancement and recovery of landscapes, habitats, waterbodies and species, the creation of resilient ecological networks, and the use of land of least environmental value where consistent with other planning objectives. It also requires consideration of designated environmental assets and opportunities for green infrastructure provision and environmental restoration.
- 6.3.10 Policy N2 seeks to ensure that development contributes positively to the natural environment and supports nature recovery. The policy requires development proposals to conserve and enhance environmental assets, minimise adverse impacts on biodiversity, strengthen ecological networks, and incorporate green infrastructure and nature-based solutions where appropriate. It also seeks to protect higher quality agricultural land, retain important natural features, and secure long-term management of environmental enhancements. The policy states that development should be refused where significant harm to biodiversity cannot be avoided, adequately mitigated, or compensated for.
- 6.3.11 Policy N6 seeks to conserve areas of particular importance for biodiversity and geodiversity by protecting internationally and nationally designated sites. The policy requires development affecting habitats sites and Sites of Special Scientific Interest (SSSIs) to demonstrate that there would be no adverse effects on their protected features, either alone or in combination with other development, unless specified tests are met or impacts are addressed through an Environmental Delivery Plan and payment of the nature restoration levy.
- 6.3.12 Policy HE1 Seeks to conserve, enhance and promote the enjoyment of the historic environment through a proportionate assessment of heritage assets, recognising their contribution to sustainable development, local character and place-making. The policy also supports the identification and protection of both designated and non-designated heritage assets and encourages consideration of the wider social, cultural, economic and environmental benefits of heritage conservation.

7 Planning Assessment

- 7.1.1 As stated within Section 6, planning applications must be determined in accordance with the relevant Development Plan unless material considerations indicate otherwise.
- 7.1.2 This section considers the key issues in the determination of the planning application. Following a detailed analysis of the planning policy framework, the following issues have been identified:
- Principle of Development
 - Land Quality
 - Flood Risk
 - Historic Environment
 - Arboriculture
 - Ecology and Biodiversity
 - Landscape
 - Soils
 - Transport

7.2 Principle of Development

- 7.2.1 The Proposed Development has been specifically designed to address the current condition of the Site by removing previously imported soils and restoring the landform using indigenous materials retained on site. The proposal will therefore result in a long-term environmental improvement through the reinstatement of the original site levels and the removal of materials that are currently altering the site's appearance and condition. The principle of restoring the land is supported by the overarching objectives of both national and local planning policy, which seek to conserve and enhance the natural environment, protect landscape character and deliver sustainable development. Policy N1 of the NPPF seeks to safeguard and enhance the natural environment by ensuring development is informed by relevant environmental evidence and promotes the conservation, enhancement and recovery of landscapes, habitats and natural resources. The Proposed Development directly supports these objectives through the removal of imported material and restoration of the Site to a condition more reflective of its surrounding environment.
- 7.2.2 At the local level, Policy CP1 of the Wokingham Core Strategy and Policy CC01 of the Managing Development Delivery Local Plan support sustainable development and reflect the presumption in favour of sustainable development established by the NPPF. The Proposed Development provides a clear and appropriate long-term solution for the Site by addressing the historic deposition of material and establishing certainty over its future management. Policy DM3 of the NPPF requires planning applications to be determined in a proactive and proportionate manner and states that proposals which accord with the development plan, the NPPF and other material considerations should not be refused. The proposal will remove long-standing imported soils and return the Site to a condition that is more consistent with its surroundings, representing a sustainable form of development.
- 7.2.3 The proposal also accords with minerals safeguarding policy. Whilst the Site lies within a Minerals Safeguarding Area, the development will not sterilise mineral resources through permanent built development. Instead, it involves temporary engineering operations (above ground) associated with the removal of previously imported soils and restoration of the land. As such, the proposal is compatible with the objectives of Policy 9 of the West Berkshire Minerals and Waste Local Plan and

Policy M2 of the Joint Minerals and Waste Plan, which seek to safeguard mineral resources whilst allowing development where impacts can be demonstrated to be acceptable.

- 7.2.4 Overall, the Proposed Development represents a sustainable form of development that will deliver environmental benefits through the restoration of the Site whilst ensuring compliance with national and local planning policy. The principle of development is therefore considered acceptable, with the detailed assessment of environmental and technical matters provided in the following sections of this Planning Statement.

7.3 Land Quality

- 7.3.1 A Phase 1 Preliminary Risk Assessment Report has been prepared by Arcadis in support of the planning application. The report was commissioned to assess whether the previously imported soils present on the Site since the early 2000s could have resulted in the presence of contaminants or any active source–pathway–receptor linkages which would require further consideration as part of the proposed soil removal and restoration works.
- 7.3.2 The Report identified that the principal potential source of contamination relates to the presence of the previously imported soils and associated small amount of demolition rubble. Previous investigations undertaken by Ramboll included 37 trial pits and laboratory testing for a broad range of potential contaminants, including heavy metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons, cyanide and asbestos. The investigation found no visual or olfactory evidence of contamination, no elevated volatile organic compound readings, and no asbestos fibres within the previously imported soils. Analytical testing demonstrated that contaminant concentrations were generally below laboratory detection limits, with no exceedances of Ramboll's Generic Assessment Criteria identified. Although asbestos fibre bundles were identified within one demolition rubble sample, subsequent analysis confirmed concentrations below hazardous waste thresholds. A demolition rubble sample tested for Waste Acceptance Criteria leachate analysis was classified as inert.
- 7.3.3 The Phase 1 assessment also considered the Site's environmental setting. The Site is underlain by Secondary A Aquifers and is located adjacent to a drainage ditch, which were identified as potential controlled water receptors, the risk is assessed as very low. However, the assessment concluded that the previously imported soils have not acted as a source of contamination to the underlying natural soils or groundwater.
- 7.3.4 Human health pathways relating to the stockpiled soils are considered not applicable in the risk assessment because the soils are planned to be removed. The site is not within a groundwater Source Protection Zone and no significant ecological designations were identified within 1km.
- 7.3.5 Whilst the assessment recommends further confirmatory testing to provide more recent soil quality data, it concludes that previous testing confirmed Constituents of Potential Concern are not present at concentrations which could have resulted in an impact on the underlying natural ground or aquifer. On the basis of the planned removal of the soils and the findings of the Preliminary Risk Assessment, there are no contamination-related concerns regarding the removal of the material.
- 7.3.6 A Soil Characterisation Report and an Indigenous Material Sampling Report were subsequently undertaken to characterise the previously imported and indigenous soils. Laboratory testing confirmed

that the soils are generally consistent with locally sourced materials, with concentrations of metals within background levels and no evidence of significant contamination.

- 7.3.7 The findings of the assessment demonstrate that the Proposed Development accords with Policy P2 of the NPPF, which seeks to ensure that land is suitable for its proposed use by requiring consideration of ground conditions. The Phase 1 Assessment and the sampling and analysis of both the previously imported soils and indigenous material confirms that contamination risks associated with the Site are low and that the proposed removal of the previously imported soils can be undertaken safely and appropriately. The proposal also accords with Policy SP1 of the West Berkshire Local Plan Review, which seeks to achieve sustainable development promoting the efficient use of land and enhancing the natural environment.
- 7.3.8 The proposal also aligns with Policy CP1 and Policy CP3 of the Wokingham Core Strategy, which seek to minimise pollution and protect environmental quality through sustainable development and care for local character by removing the imported materials and restoring the Site to its original condition. The Proposed Development will restore the site's appearance so that it better reflects the surrounding landscape character.
- 7.3.9 Overall, the Phase 1 Assessment and the sampling and analysis of both the previously imported soils and indigenous material demonstrates that the Proposed Development will not give rise to unacceptable contamination risks and is compliant with relevant national and local planning policy.

7.4 Flood Risk

- 7.4.1 A Flood Risk Assessment (FRA) has been prepared by Arcadis in support of the planning application. The assessment was undertaken because the Site lies within Flood Zone 3, with portions of the Site identified as Flood Zone 3b (as laid out in the Wokingham Borough Strategic FRA), and planning policy requires development proposals in areas at risk of flooding to be supported by an appropriate FRA considering flood risk from all sources.
- 7.4.2 The FRA assesses the risk of flooding from rivers, surface water, groundwater, sewers and other artificial sources, and considers the potential implications of the proposed soil removal and restoration works.
- 7.4.3 The FRA identifies that the Site is located partially within Flood Zone 3 and that there are a number of nearby water features, including the Foudry Brook approximately 150m to the east, Burghfield Brook approximately 500m to the south and an unnamed drainage ditch along the southern boundary of the Site. Historic flood mapping indicates that the Site has previously been affected by fluvial flood events in 1971 and 2002, although consultation with the Environment Agency confirmed there are no records of flooding from groundwater, rivers or surface water at the Site.
- 7.4.4 The assessment concludes that, whilst the Site lies within Flood Zone 3, the majority of the Site is located on land at a very low risk of fluvial flooding, defined as an annual probability of flooding of less than 0.1%, with areas of higher risk concentrated through the centre of the Site and along the eastern boundary where existing topographic low points occur. The areas identified as being at higher risk correspond with existing topographic low points within the Site.

- 7.4.5 The FRA also considered the effects of climate change and concluded that future flood depths are not expected to exceed present day depths. Hydraulic modelling demonstrates that flood flows reaching the Site are associated with water backing up from the Foudry Brook and entering the Site from the southeast via the culvert beneath Kirton's Farm Road and Longwater Avenue. Importantly, the assessment concludes that the proposed removal of previously imported soils will create additional flood storage capacity within the Site and retain the existing flood flow path. As a result, the Proposed Development is not expected to increase flood risk to third party land.
- 7.4.6 In relation to surface water flooding, the FRA concludes that the majority of the Site is at very low risk of flooding, with only limited areas of higher risk associated with the existing drainage ditch along the southern boundary. Climate change mapping indicates that most of the Site would remain at very low risk in the future, with only small areas increasing to a low risk category and predicted flood depths of less than 0.2m. As the Proposed Development will not increase impermeable land cover, the assessment concludes that it will not increase surface water flood risk elsewhere.
- 7.4.7 The FRA identifies a number of mitigation and management measures that will be implemented through the Outline Construction Environmental Management Plan. These include monitoring flood alerts and severe weather forecasts during the restoration works and implementing appropriate contingency measures where necessary. The assessment identifies that the Site is underlain by Secondary A aquifers and is considered susceptible to groundwater flooding. However, suitable controls can be implemented should groundwater be encountered during the works.
- 7.4.8 The findings of the FRA demonstrate that the Proposed Development accords with Policy F7 of the NPPF, which seeks to ensure that development is safe from flooding and does not increase flood risk elsewhere. No built development is proposed, hence it is considered that the Site would be classified as 'water compatible' development which is deemed an acceptable land use in Flood Zone 3a and 3b. The FRA concludes that the Proposed Development is appropriate on flood risk grounds, will retain the existing flood flow path, provide additional flood storage capacity and will not increase flood risk to third party land. The proposal therefore satisfies the objectives of national planning policy relating to flood risk.
- 7.4.9 It also demonstrates that the proposal complies with policy SP6 of the West Berkshire Local Plan Review which states that development must be safe for its lifetime and avoid increasing flood risk elsewhere. As well as policy CC09 which requires that development must carefully manage and mitigate flood risk from all sources, ensuring that inappropriate development in flood risk areas is avoided. Development must be directed to areas of lowest risk through the sequential approach, avoid increasing flood risk elsewhere, and incorporate mitigation measures where necessary.
- 7.4.10 The Proposed Development complies with both Policy SP6 of the West Berkshire Local Plan Review and Policy CC09 of the Managing Development Delivery Local Plan, which require development to be safe for its lifetime, appropriately manage flood risk from all sources and avoid increasing flood risk elsewhere. The FRA demonstrates that the proposed removal of previously imported soils and reprofiling of the Site will retain existing flood flow routes, increase flood storage capacity and not increase flood risk to third party land. Furthermore, the assessment concludes that the proposal is appropriate on flood risk grounds and that suitable management measures can be implemented during the restoration works where required.
- 7.4.11 The Proposed Development also complies with Policy CC10, which seeks to ensure that surface water is managed sustainably and that development does not adversely affect flood risk. The FRA

confirms that the proposal will not result in an increase in impermeable land cover and therefore will not increase surface water flood risk to third party land.

7.5 Historic Environment

- 7.5.1 A Cultural Heritage Desk Based Assessment has been prepared by Arcadis in support of the planning application. The assessment was undertaken to identify designated and non-designated heritage assets within the Site and surrounding Study Area, assess the archaeological potential of the Site and determine the likely effects of the Proposed Development on heritage significance, including any impacts on the setting of heritage assets.
- 7.5.2 The assessment identified a large number of non-designated heritage assets and one designated heritage asset within the 500m Study Area. It also concludes that there are no designated heritage assets within the Site and that the Proposed Development would not result in any harm to the significance or setting of nearby designated heritage assets. In particular, the assessment determines that the Site does not contribute to the significance of the nearby Grade II listed Kirtons Farmhouse through its setting and therefore concludes that the proposal would not result in harm to that asset.
- 7.5.3 In terms of archaeology, the assessment identifies medium archaeological potential for Prehistoric and Roman remains, low archaeological potential for Medieval and Post-Medieval remains and negligible archaeological potential for Early Medieval and Modern remains. The assessment concludes that historic soil movement and the long-term presence of imported materials may have resulted in compaction of shallow archaeological deposits. Consequently, the likelihood of undisturbed archaeological remains surviving within the Site is assessed as low to medium.
- 7.5.4 The assessment concludes that the Proposed Development would result in no harm to designated heritage assets and no harm to the significance of heritage assets through changes to their setting. Whilst there is potential for minor direct impacts to two partially extant non-designated archaeological assets within the Site, the assessment concludes that any effect would amount to minor, less than substantial harm. Given the anticipated condition of archaeological remains beneath the Site, trial trenching is not recommended. Instead, the report recommends that archaeological monitoring of construction activity (formerly known as an archaeological watching brief) be undertaken during the appropriate stage of the proposed restoration activities, secured through an approved Written Scheme of Investigation.
- 7.5.5 The findings of the assessment demonstrate that the Proposed Development accords with Policy HE1 of the NPPF, which seeks to deliver the conservation, enhancement and enjoyment of the historic environment through a proportionate assessment of heritage assets and consideration of the wider benefits of conserving the historic environment. The Cultural Heritage Desk Based Assessment provides a detailed assessment of both designated and non-designated heritage assets and concludes that the Proposed Development will not result in harm to the significance of designated heritage assets. The proposal also complies with Policy TB24 of the Wokingham Managing Development Delivery Local Plan, which seeks to conserve the significance and setting of designated heritage assets.
- 7.5.6 Policy SP9 of the West Berkshire Local Plan Review, seeks to conserve and where appropriate enhance heritage assets and ensure that development responds positively to archaeological interest and significance. The assessment concludes that the proposal will not adversely affect the

significance or setting of designated heritage assets and that any effects on non-designated archaeological remains would be limited to less than substantial harm. The recommendation for archaeological monitoring will further ensure that any surviving archaeological remains are appropriately recorded and understood.

7.6 Arboriculture

- 7.6.1 An Arboricultural Impact Assessment (AIA) has been prepared by Arcadis in support of the planning application. The assessment was undertaken in accordance with BS 5837:2012 and considers arboricultural features within the Site and within influencing distance of the Site, including trees located up to 15 metres outside the Site boundary. The report was prepared to inform the design and planning process in relation to arboricultural constraints associated with the Proposed Development.
- 7.6.2 A total of 26 arboricultural features were recorded within the study area, comprising 10 individual trees, 15 groups of trees and one hedgerow. Of these features, one individual tree was identified as Category A, five individual trees, 12 groups and one hedgerow were identified as Category B, three individual trees and two groups were identified as Category C, and one individual tree was identified as Category U.
- 7.6.3 A tree constraints check was undertaken using West Berkshire Council and Wokingham Borough Council online services, alongside a review of statutory designated sites, ancient woodland records and the Woodland Trust Ancient Tree Inventory. The report confirms that no trees within the survey boundary are subject to Tree Preservation Orders or Conservation Area restrictions, and that no designated ancient woodlands were identified within the study area.
- 7.6.4 The assessment identifies one ancient tree within the Site, T1 Alder (*Alnus glutinosa*), which is classified as an ancient tree and is therefore an irreplaceable habitat. The report states that this tree will require retention and protection from damage or harm during the proposed works in order for the proposals to comply with national planning policy.
- 7.6.5 The AIA identifies that one individual tree and three tree groups will require full or partial removal to facilitate the proposed access arrangements and restoration works. The assessment concludes that these removals comprise predominantly Category C and Category U features and would represent a low impact on the overall visual amenity and arboricultural value of the Site. The AIA also identifies that limited facilitation pruning will be required to a number of retained trees and groups to allow safe access and construction activities. A total of four individual trees and seven groups of trees to be fully or partially retained within the study area will be subject to potential Root Protection Areas incursions.
- 7.6.6 The findings of the assessment demonstrate that arboricultural constraints have been identified and considered as part of the planning application. Subject to the implementation of appropriate tree protection measures including tree protection fencing, Construction Exclusion Zones, arboricultural supervision of works within Root Protection Areas and a site-specific Arboricultural Method Statement, the Proposed Development would accord with the objectives of Policy DM15 of the West Berkshire Local Plan Review. This supports development that conserves and enhances trees, woodland and hedgerows and requires appropriate protection for retained trees in advance of works on site. The proposal also accords with Policy CC03 of the Managing Development Delivery Local Plan, which seeks to protect and enhance trees, landscaping and green infrastructure, ensuring that important

arboricultural features are retained and appropriately safeguarded throughout the development process.

7.7 Ecology and Biodiversity

- 7.7.1 A Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) Assessment has been prepared by Arcadis to support the planning application. The Site comprises a range of habitats, including other broadleaved woodland, mixed scrub, other neutral grassland, sparsely vegetated land comprising ruderal/ephemeral vegetation, and tall forb vegetation. The PEA did not identify any statutory designated ecological sites within 2km of the Site, nor any SACs designated for bats within 10km. Eight non-statutory Local Wildlife Sites were identified within 2km, the closest being Burghfield Gravel Pits Local Wildlife Site approximately 50m west of the Site, beyond the railway embankment.
- 7.7.2 The Site contains habitats suitable for a range of protected and notable species, including bats, amphibians, reptiles, badger, hazel dormouse, nesting birds, hedgehog and other mammals. No badger setts, potential setts or field signs were recorded within or immediately adjacent to the Site. No aquatic habitats suitable for otter or water vole were recorded on the Site and both species were scoped out of further assessment. The Site also provides suitable foraging and commuting habitat for bats through its woodland, scrub, grassland and tall forb habitats.
- 7.7.3 The PEA also identified a stand of Japanese Knotweed, approximately 2m by 4m, within the northern edge of the Site, which is cordoned off by Heras fencing. The extent of the Japanese Knotweed had not increased since the previous specialist survey (by Japanese Knotweed Solutions in 2025). The dense scrub along the eastern boundary could not be fully assessed for invasive non-native species due to access limitations, and a precautionary approach is therefore recommended for works in this area.
- 7.7.4 The PEA concludes that no further ecological surveys are required to inform the ecological baseline or mitigation recommendations. However, a range of precautionary mitigation measures are recommended and should be secured through a Precautionary Working Method Statement. These include ecological supervision for any works affecting trees with bat roosting potential, sensitive lighting design, precautionary vegetation clearance methods for reptiles and amphibians, pre-works checks for badger and other mammals, checks for hazel dormouse where scrub or woodland is affected, and nesting bird checks where vegetation or topsoil removal is required during the breeding bird season.
- 7.7.5 With regard to designated sites, the report concludes that no impacts are anticipated on statutory designated sites. Burghfield Gravel Pits Local Wildlife Site lies close to the Site; however, the intervening railway embankment is considered sufficient to provide screening from daytime noise and visual disturbance. Artificial lighting should nevertheless be designed to minimise disturbance to species using the Local Wildlife Site and surrounding habitats.
- 7.7.6 In respect of BNG, the Environment Act 2021 requires development to achieve a minimum 10% net gain in biodiversity. The report confirms that the Site's baseline habitats comprise moderate-condition other broadleaved woodland, moderate-condition mixed scrub, moderate-condition other neutral grassland, good-condition sparsely vegetated ruderal/ephemeral land, and good-condition tall forb vegetation. The Proposed Development would result in a deficit from the loss of on-site habitat. To address the deficit, it has been agreed that, to ensure compliance and minimise risk, all BNG units will

be secured through off-site habitat enhancement or creation. This will be delivered via a bespoke habitat bank, which, will, where possible be located within one of Councils boundaries. The baseline habitats currently present on Site comprise of 18.27 habitat units. To achieve a 10% BNG, a total of 20.09 units of habitat creation / enhancement will be required. To satisfy trading rules, these units would need to be for habitats of medium distinctiveness or higher. As habitat enhancement / creation is not feasible within the Site given the intended end state, BNG units will be purchased from a habitat bank (despite the planned restoration to agricultural land use, the subsequent site management cannot feasibly be secured for the required minimum of 30 years).

- 7.7.7 The PEA and BNG Assessment therefore conclude that, subject to the implementation of the recommended mitigation measures, appropriate management of Japanese Knotweed, and securing of off-site biodiversity units, the Proposed Development can proceed without unacceptable ecological effects. The Proposed Development would restore the land for future agricultural use while ensuring compliance with statutory BNG requirements and relevant ecological legislation and policy.

7.8 Landscape

- 7.8.1 A Landscape and Visual Appraisal (LVA) has been prepared by Arcadis in support of the planning application. The appraisal considers effects on the surrounding Landscape Character Areas, including LCA I3 Grazeley Farmed Clay Lowland and LCA RO1 Kennet Lower River with Open Water. Whilst construction activities would introduce temporary noise, dust, vehicle movements and earth moving operations, the assessment concludes that these impacts would be largely contained within the Site and its immediate surroundings by existing vegetation and landscape features.
- 7.8.2 The surrounding Landscape Character Areas are assessed as having medium-low sensitivity in the vicinity of the Site due to the influence of surrounding infrastructure and urban development, including the M4 motorway, the Reading to Basingstoke railway line and Reading Green Park Business Park. As a result, the LVA concludes that construction would result in a temporary Minor (adverse) landscape effect. Following completion of the restoration works, the assessment concludes that the landform would tie in with the surrounding land and that the majority of mature boundary vegetation would remain in place, with any localised vegetation removal required for visibility splays to be mitigated through replacement planting.
- 7.8.3 At the Site level, the assessment identifies direct effects associated with the removal of the previously imported soils and associated construction activities. However, the Site is assessed as being of Low sensitivity, reflecting its previously disturbed condition, the presence of the previously imported soils and the influence of surrounding urban fringe and infrastructure features. The appraisal concludes that construction activities would result in a temporary Minor (adverse) effect on the Site itself. The influence of the development would reduce substantially following completion of the works.
- 7.8.4 In terms of visual amenity, the appraisal concludes that the Site is well contained by existing vegetation, landform and surrounding development, with views from much of the Study Area screened by a combination of existing vegetation and topography. During construction, activity associated with soil removal including earth-moving plant, vehicle movements, noise, dust and disturbance, would result in a Minor (adverse) effect, temporary in duration. Following completion of the restoration works, construction activity would cease and visual effects would reduce substantially. Overall, the LVA concludes that the Proposed Development would not result in any unacceptable residual long-term effects on landscape character or visual amenity. The proposal also accords with Policy SP8 of

the West Berkshire Local Plan Review, which seeks to protect landscape character and guide restoration proposals. The appraisal demonstrates that landscape effects would be limited and temporary during construction and that, following completion of the restoration works, there would be no change to the character of the surrounding Landscape Character Areas.

- 7.8.5 The Proposed Development also complies with Policies CP1 and CP3 of the Wokingham Core Strategy, which seek to maintain and enhance environmental quality and ensure that development does not result in unacceptable impacts on landscape features. The LVA concludes that effects on landscape character and visual amenity would be localised, temporary and appropriately contained by existing landscape features, with no unacceptable residual effects identified. The Proposed Development is therefore considered acceptable in landscape and visual terms.

7.9 Soils

- 7.9.1 An Indigenous Material Sampling Report has been prepared by Arcadis in support of the planning application. The report has been informed by a Soil Resource Survey undertaken to characterise the indigenous material present within the western part of the Site and assess its suitability for reprofiling and restoration works. The survey also included an inspection of the previously imported soils which are proposed to be removed as part of the development.
- 7.9.2 The Soil Resource Survey identified that the surficial layer of the indigenous material is classified as Multipurpose Topsoil in accordance with BS3882:2015. Laboratory analysis identified moderate phosphorus levels, high potassium levels, very high magnesium levels and an organic matter content of 11.5%. The material was also found to contain no visible contaminants and no phytotoxic concentrations of zinc, copper or nickel. It is confirmed that the soils would be suitable for the future establishment of improved grassland, such as perennial ryegrass, without the need for significant soil amendments.
- 7.9.3 The assessment concludes that the indigenous material is suitable for reprofiling and restoration of the Site following removal of the previously imported soils. Whilst previous deeper samples did not consistently meet BS3882:2015 criteria, the report concludes that these samples are not fully representative of the blended material likely to be used during restoration. On this basis, the indigenous material is considered suitable for topsoil reuse and reinstatement across the Site. The report recommends that soil reprofiling works using the indigenous material are appropriately supervised by a suitably experienced person to ensure that soil resources are managed and restored appropriately during the works.
- 7.9.4 The findings of the Soil Resource Survey demonstrate that the Proposed Development accords with Policy N1 of the NPPF, which seeks to safeguard and enhance the natural environment through the conservation, enhancement and recovery of landscapes, habitats and natural resources. The Soil Resource Survey demonstrates that the indigenous material is suitable for reuse as topsoil and can be used to restore and reprofile the Site following removal of the previously imported soils.

- 7.9.5 The proposal further accords with Policy CP11 of the Wokingham Core Strategy, which seeks to protect the countryside and secure environmental improvements where development is justified outside development limits. The removal of the previously imported soils and restoration of the Site through the careful management and reuse of indigenous material will improve the condition of the land and ensure that the restored landform ties in with surrounding field levels. The proposal also complies with Policy SP1 of the West Berkshire Local Plan Review, which promotes sustainable development through the protection and enhancement of environmental quality and the responsible management of natural resources.

7.10 Transport

- 7.10.1 A Transport Statement and Highway Visual Condition Report has been prepared by Arcadis in support of the planning application. The Transport Statement assesses the transportation impacts of the proposed works and considers whether the development can be accommodated without causing undue impact on the local transport network. The assessment was prepared following pre-application consultation with West Berkshire Council and Wokingham Borough Council, both of which confirmed the requirement for a Transport Statement to support the application.
- 7.10.2 Access to the Site is via Kirton's Farm Road, a single-carriageway road with one lane in each direction and subject to the national speed limit (60 mph). To inform the design of the proposed access, determine the appropriate visibility splays in accordance with relevant guidance, and support the assessment of transport impacts, an Automatic Traffic Count (ATC) and speed survey was undertaken on Kirton's Farm Road between 10 July and 17 July 2026. The survey recorded the traffic volumes and vehicle speeds continuously over a seven-day period. The full survey results are detailed within the Transport Statement.
- 7.10.3 The proposed works are temporary in nature and are limited to the removal of the previously imported soils and subsequent restoration of the Site confined to the construction phase only, with no permanent operational development proposed.
- 7.10.4 For the assessment, traffic generation was estimated based on the anticipated volume of material to be removed from the Site. It is anticipated that approximately 18,000m³ of previously imported soils will be removed from the Site and transported to a suitably authorised facility under appropriate Duty of Care arrangements, with transport impacts therefore confined to the construction phase. The assessment estimates that approximately 1,800 HGV loads would be required over the anticipated seven-month construction period, generating approximately 3,600 two-way HGV movements across the duration of the works. This equates to an average of approximately 19 HGV loads per day, or 38 two-way HGV movements per day. It should be noted that these figures represent average daily movements only, and actual HGV numbers may vary throughout the construction period depending on the final construction programme, haulage strategy, and phasing of earthworks activities. Given the relatively low existing traffic flows recorded on Kirton's Farm Road, the Transport Statement concludes that this level of additional traffic is not expected to have a material impact on the operation, capacity or safety of the local highway network.
- 7.10.5 The Transport Statement also states that in addition to the HGV movements, a small number of workforce trips will be associated with the proposed development. The works are expected to be undertaken by a small team with fewer than 10 personnel typically on Site at any one time. The workforce traffic is expected to be negligible when compared with HGV movements associated with

the removal of the previously imported soils and not anticipated to have a material impact on local highway conditions.

- 7.10.6 The proposals include the reinstatement of the existing Site access, at the location of the current access gate, off Kirton's Farm Road. The proposed access arrangements have been assessed to ensure that construction vehicles can safely enter and leave the Site. Although the majority of HGV movements are expected to comprise 8-wheel tipper vehicles, the access has been designed to accommodate a 16.5m articulated vehicle to allow for the delivery and removal of plant and machinery.
- 7.10.7 As a result of the ATC and to minimise impacts on existing vegetation and reduce the extent of clearance required to achieve visibility standards, it is proposed that the speed limit on Kirton's Farm Road is temporarily reduced to 30 mph in the vicinity of the Site access during the works. The proposed reduction would also provide a safety benefit by reducing vehicle approach speeds, improving driver reaction times, and enhancing conditions for all road users.
- 7.10.8 The proposed speed limit reduction will be secured through the CLP as a mitigation measure. The appointed contractor will be responsible for obtaining the necessary approvals associated with the speed limits.
- 7.10.9 The Proposed Development complies with Policy CP1 of the Wokingham Core Strategy, which seeks to ensure that development minimises impacts on amenity and provides safe and accessible development. The Transport Statement demonstrates that the reinstated access, along with the temporary speed reduction, will provide a safe and suitable means of access for the anticipated construction traffic, that workforce traffic will be negligible, and that the additional HGV movements are not expected to result in a material impact on the operation, capacity or safety of the local highway network.
- 7.10.10 The proposal is also consistent with Policy DM35 of the West Berkshire Local Plan Review, which requires proposals in the countryside to limit impacts on rural roads. The Transport Statement confirms that the works are temporary, that construction traffic will be managed through an OCLP, and that appropriate measures will be used to manage HGV routing, site access, vehicle scheduling, wheel washing and procedures to minimise mud and debris on the public highway. The Proposed Development is therefore considered acceptable in transport and highway terms.

8 Conclusion

- 8.1.1 This Planning Statement has been prepared by Arcadis Consulting (UK) Limited on behalf of M&G Real Estate acting on behalf of Prudential Assurance Company Ltd in support of a full planning application for the removal of previously imported soils currently stored on part of the Site, including enabling works, followed by the restoration and reprofiling of the land to its original level using indigenous material retained on Site. The Proposed Development involves the removal of approximately 18,000m³ of previously imported soils, together with enabling works and land restoration activities. The proposals have been developed to address the current condition of the Site and provide a clear planning basis for the removal of the imported materials and restoration of the land to its original condition.
- 8.1.2 A programme of pre-application engagement has been undertaken with both Wokingham Borough Council and West Berkshire Council, alongside consultation with the relevant Parish Councils. The planning application has been informed by the advice received through this process and is accompanied by a comprehensive suite of supporting technical assessments.
- 8.1.3 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan comprises the adopted development plan documents for both Wokingham Borough Council and West Berkshire Council, together with the relevant minerals and waste plans. The policy framework seeks to promote sustainable development, protect environmental quality, conserve landscape character, manage flood risk, safeguard biodiversity and heritage assets, and ensure development is appropriate to its setting.
- 8.1.4 The proposal is supported by a comprehensive suite of technical assessments, including assessments relating to land quality, flood risk, cultural heritage, arboriculture, ecology, landscape and visual effects, soils and transport. These assessments demonstrate that the Proposed Development can be undertaken without giving rise to unacceptable environmental effects and that appropriate mitigation and management measures can be implemented where required.
- 8.1.5 The technical assessments conclude that contamination risks associated with the Site are low, the proposal will not increase flood risk elsewhere and will provide additional flood storage capacity, landscape and visual effects will be temporary and limited in extent, and there would be no harm to the significance of designated heritage assets. The assessments also confirm that important arboricultural features, including the identified ancient tree, can be retained and protected, and that the indigenous material present on Site are suitable for use as part of the restoration works.
- 8.1.6 Overall, the planning balance weighs in favour of the Proposed Development. The proposal would remove previously imported materials from the Site and deliver the restoration and reprofiling of the land to a condition more consistent with its surrounding countryside setting. The Proposed Development accords with the relevant policies of the Development Plan and with national planning policy and guidance.
- 8.1.7 Accordingly, it is respectfully requested that planning permission is granted for the Proposed Development.

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