



# Full Planning Application

## Earthworks and ventilation column associated with sewer upgrades

Land north of Palmer Place  
Arborfield  
Berkshire

Planning Application Supporting Statement

April 2026

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# 1. Introduction & Background to Development

- 1.1. This Planning Statement has been prepared on behalf of Thames Water Utilities Limited (the applicant) in relation to a proposed sewer upgrades on land north of Palmer Place, Arborfield (the site). The majority of the works constitute permitted development as set out within Section 3 below, however, planning permission is required for earthworks and a ventilation column. Following pre-application advice from the Council the site boundary for the application includes temporary working areas which constitute permitted development.
- 1.2. Modelling of the growth within Arborfield and the impact on the existing sewer network indicates an increased risk of sewer flooding from surcharging sewers. The sewer upgrades are required to ensure that there is capacity within the sewer network to reduce the risk of surcharging of the existing sewer network which could occur within the Hazebrouck Meadows Suitable Alternative Natural Greenspace (SANG).
- 1.3. Locations for the upgrades to address the capacity constraint are limited and to resolve the risk sewer upgrades are required within the SANG area. While the new sewers will be below ground and can be installed under permitted development rights the limited depth of the new assets requires some minor reprofiling of the ground within the SANG and amendments to the landscaping in the area together with a ventilation column to enable air in and out of the network. It is these works which planning permission is being sought for. On the advice of the Council, the application also includes the temporary working areas which would constitute permitted development under Schedule 2, Part 4, Class A of the Town and Country Planning (General Permitted Development) Order 2015.
- 1.4. This Planning Statement sets out the details of the proposed development at the site and assesses the proposal against relevant national and local planning policies together with other material considerations. It should be read in conjunction with the following plans and documents that have been submitted with the application:
  - Application Drawings:
    - Site Location Plan
    - L795-IL-100-CE-0100 – Site Layout
    - L795-IL-100-CE-0101 – Plan and Section
    - L795-IL-100-CE-0102 – Plan and Section
    - L795-IL-100-CE-0103 – Plan and Section
    - L795-IL-100-CE-0104 – Manhole Plan and Section
    - L795-IL-100-CE-0105 – Vent Column Elevation and Manhole Sections
    - L795-IL-100-CE-0106 – Manhole Sections
  - Preliminary Ecological Appraisal
  - Arboricultural Impact Assessment
  - Landscape Visual Appraisal
  - Completed BNG Metric

## 2. Application Site and Surrounding Area

- 2.1. The application site is located within the Hazebrouck Meadows SANG to the north of Palmer Place. The area is also within the countryside and within flood zone 1 as shown on the Environment Agency Flood Map for Planning.
- 2.2. The site incorporates an area of young tree planting and footpaths along with other habitat provided as part of the SANG designation. Prior to the establishment of the SANG the area was occupied by football pitches as part of Reading Football Clubs training ground. Photos of the site as existing are provided in Appendix A.
- 2.3. The area of SANG on which the application site is located was approved as a 2.83ha extension to Hazebrouck Meadows SANG under planning application no 163547 which was approved on the 31<sup>st</sup> March 2021. Conditions attached to the approval required a Landscape and Ecology Management Plan (LEMP) to be submitted for approval. Subsequently, a LEMP was submitted to address the requirements of Conditions 21, 22 and 23 of application 163547 with the LEMP approved under application ref. 223676 on 19<sup>th</sup> July 2024.
- 2.4. The proposed site covers an area of 0.27ha which includes the area for proposed works and temporary construction areas.

### 3. Proposed Development

- 3.1. The proposals involve the provision of two new tank sewers with associated connections and manholes to the existing sewer which runs through Hazebrouck Meadows. The new tank sewers and connections will predominantly be below ground where they would constitute permitted development under Schedule 2, Part 13, Class B(a) of the Town and Country Planning (General Permitted Development) Order 2015 (GPDO). While the new sewer works constitute permitted development, the tank sewers will be located close to the surface and as a result there is a requirement for earthworks above the tank sewer in order to maintain a suitable depth of cover. These earthworks result in above ground operations which require planning permission.
- 3.2. In addition to the earthworks, a ventilation column is required to enable the flow of air in and out of the network as the network fills and empties. This ventilation column also requires planning permission being an above ground asset. In addition to the ventilation column the only other assets that would be visible upon the completion of the works would be 8 manhole covers with each cover less than 0.5m<sup>2</sup> in area. In total the works will result in less than 5m<sup>2</sup> of habitat from the area of SANG.
- 3.3. To deliver the upgrades a temporary working area is required for storage of topsoil and excavated material, providing suitable working areas and providing welfare facilities and storage areas for plant and machinery. The temporary working areas will be adjacent the development and such constitute permitted development under Part 4, Class A of the GPDO on the basis that the land will be restored to its existing condition following the completion of the development. The area for the temporary working area currently contains young tree planting. This will be removed to facilitate the development with replacement tree planting upon the completion of the works to ensure that the habitat is maintained with minor layout changes as a result in needing to avoid planting directly above the new sewer layout.
- 3.4. To reduce the risk of sewer flooding which would cause pollution of the area of SANG it is proposed to commence delivery of the upgrades as soon as permission has been obtained in summer 2026 with an anticipated construction duration of 5 months.
- 3.5. The description of development for the application is:

*“Ground reprofiling, access covers and ventilation column associated with upgrades to sewer network and temporary use of land for construction with subsequent restoration.”*

## 4. Pre-application Advice

- 4.1. Pre-application advice has been sought from the Council in advance of the planning application being prepared. Initial advice was received on the 27<sup>th</sup> October 2025 with further comments received on the 15<sup>th</sup> December 2025.
- 4.2. The advice received from the Council indicated that while works would constitute permitted development, elements of the scheme required planning permission and an application should be submitted including the temporary working areas. The application would need to be accompanied by a detailed landscape and replanting scheme to ensure the continued function and visual appearance of the SANG.
- 4.3. The Council acknowledged the need for the upgrades and appreciated the thought process behind the chosen location. The Council indicated that in principle, subject to suitable replanting, mitigation and submission of a full planning application encompassing all the works, the development is likely to be acceptable although an alternative location for the ventilation column was encouraged.
- 4.4. It is not agreed that planning permission would be required for all of the proposed works because of limited earthworks and a ventilation column which require planning permission. As set out in Section 3 above, the below ground works and temporary works are considered to constitute permitted development. However, for the avoidance of doubt the application boundary has included all temporary working areas and includes details of how these will be restored on the completion of the development.

## 5. Needs Case and Site Selection

- 5.1. Modelling of the growth within Arborfield and the impact on the existing sewer network indicates an increased risk of sewer flooding from surcharging sewers. In particular, at location SU77656202, which is within the existing SANG, the modelling indicates that there would be an increase in surcharge from the manhole at this location of 80.4m<sup>3</sup> of sewage as shown in Figure 1 below. This would have an adverse impact on the environment within the SANG.
- 5.2. Alternative upstream options to address the detriment on the network have been considered. These included adjusting the pump rates from upstream pumping stations but this option did not solve the flooding and surcharge increases when modelled. Downrating an existing sewage pumping station and constructing storage upstream was also considered but would not be constructable.
- 5.3. To resolve the detriment, an increase in capacity within the network is required north of Palmer Place. Construction of the capacity within the highway at Palmer Place is not viable due to the size and depth of the tanks required and the services within the highway. North of this, all the area through which the existing sewer which requires capacity passes is SANG/open space until it moves north of Hazebrouck Meadows. An alternative site at the northern end of Hazebrouck Meadows has been considered (see Figure 3). This site is also within the SANG, is closer to the Longmoor Bog SSSI and would require deep excavations of circa 6m and more extensive temporary working areas, sheet piling and dewatering operations and the option is not considered the preferable solution as a result of the increased environmental impact that would occur within this area.

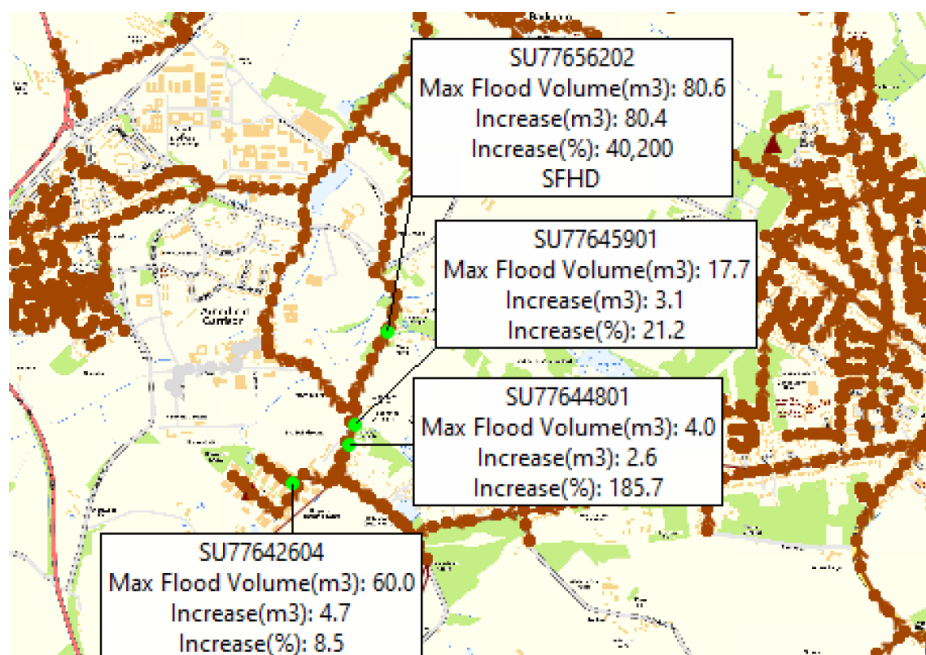


Figure 1: Sewer network modelling showing surcharging risks.

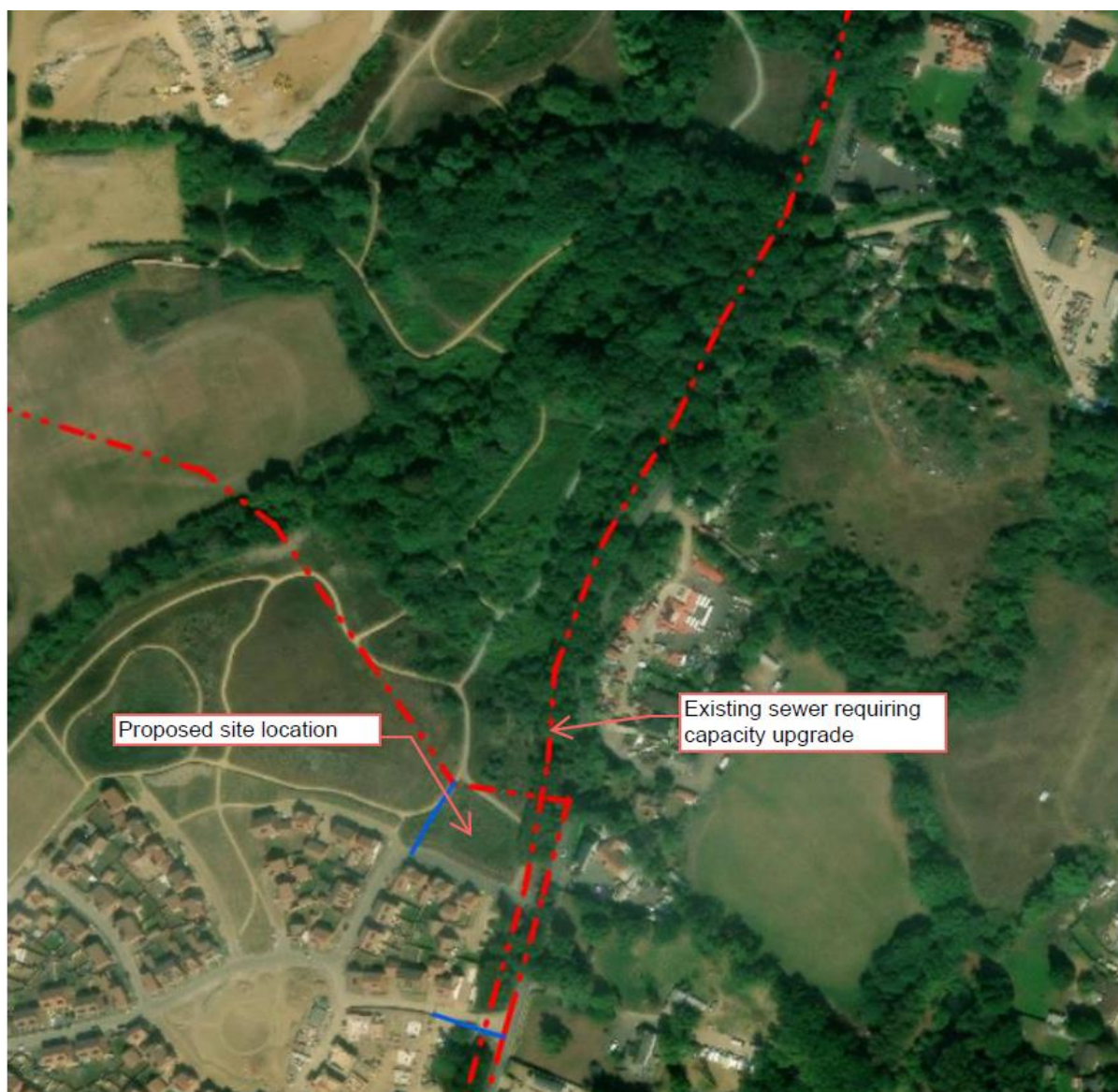


Figure 2: Proposed site location and position of sewer to be upgraded.



Figure 3: Alternative site location on land north of Biggs Lane, Arborfield.

- 5.4. In response to the pre-application feedback from the Council the location of the proposed ventilation column has been reviewed. To minimise the visual impact of the ventilation column an alternative location to the north of the application site was initially proposed as shown in Figure 4 below. However, detailed design progression has demonstrated challenges to provision in this location as a constant upward gradient is required between the new sewer tank and the ventilation column. This would result in more significant ground works to maintain cover over the connecting pipework which would impact of the footpaths within the SANG.
- 5.5. As a result of the above challenges, the proposed location for the ventilation column is as shown in Figure 2 below. This location is well away from the residential premises ensuring compliance with relevant guidance to avoid any adverse odour impacts. It is also in a location where the ventilation column will become screened by the tree planting in the area as it establishes.

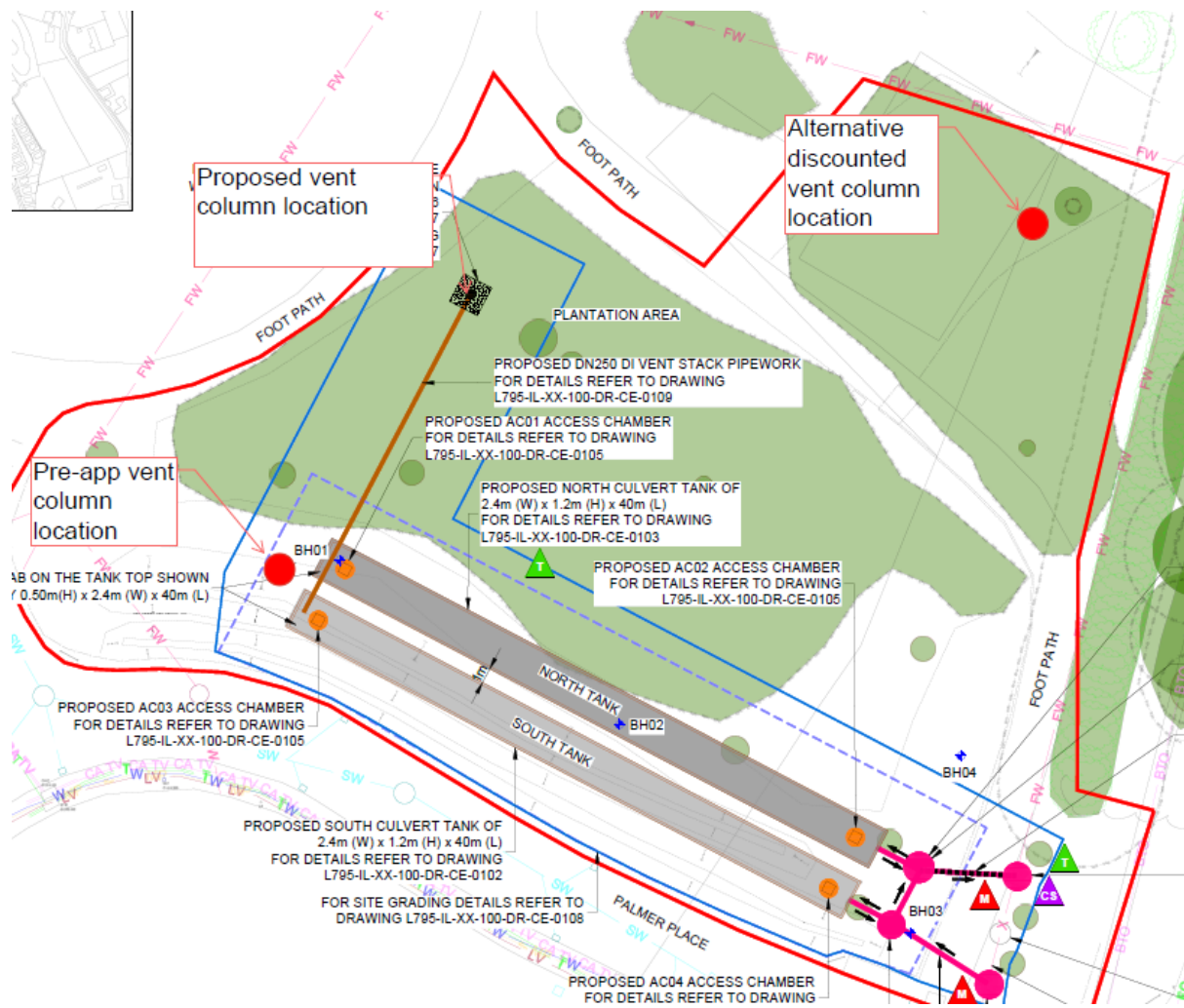


Figure 4: Ventilation column location options.

## 6. Planning Policy

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.

### National Planning Policy

- 6.2. The revised National Planning Policy Framework (NPPF) December 2024. The policy guidance it contains which is relevant to the determination of this application includes:
- A presumption in favour of sustainable development.
  - Approving development proposals that accord with the development plan without delay.
  - Proactive drive and support for sustainable economic development to deliver infrastructure that the country needs.

- 6.3. Key extracts of the NPPF that are considered relevant to the proposed development include:

- Paragraph 11 states: *“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*
- Paragraph 20 of the NPPF sets out that: *“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”*

### Development Plan

- 6.4. The Development Plan for the area consists of the Wokingham Core Strategy Development Plan Document adopted January 2010 (the Core Strategy), the Wokingham Managing Development Delivery Local Plan adopted February 2014 (the MDDL), the Central and Eastern Berkshire Joint Minerals and Waste Plan (the Waste Plan) and the Arborfield and Barkham Neighbourhood Plan 2019-2036 made in April 2020 (the Neighbourhood Plan).
- 6.5. Policies of the Core Strategy that are of particular relevance to the proposed development include:
- Policy CP1 – Sustainable Development
  - Policy CP3 – General Principles for Development
  - Policy CP7 – Biodiversity
  - Policy CP11 – Proposals Outside Development Limits (including countryside)

6.6. Policies of the MDDL P that are of particular relevance to the proposed development include:

- Policy CC01 – Presumption in Favour of Sustainable Development
- Policy CC03 – Green Infrastructure, Trees and Landscaping
- Policy CC09 – Development and Flood Risk
- Policy CC10 – Sustainable Drainage
- Policy TB21 – Landscape Character
- Policy TB23 – Biodiversity and Development
- Policy SAL5 – Delivery of avoidance measures for Thames Basin Heaths Special Protection Area.

6.7. Policy AD4 of the Neighbourhood Plan is also considered to be relevant to the proposals. The policy relates to addressing local flood risk management.

### Emerging Policy

6.8. The Wokingham Borough Local Plan Update 2023-2040 (the LPU) was submitted to the Secretary of State for examination in February 2025 and is a material consideration in the determination of any planning application. The policies of the LPU of relevance to the proposed development include:

- Policy SS1 – Sustainable development principles
- Policy SS5 – Development in the countryside
- Policy FD1 – Development and flood risk
- Policy FD2 – Sustainable drainage
- Policy C8 – Utilities
- Policy NE1 – Biodiversity and geodiversity
- Policy NE2 – Biodiversity net gain
- Policy NE4 – Trees, woodland, hedges and hedgerows
- Policy NE5 – Landscape and design
- Policy DH1 – Place making and quality design
- Policy HC3 – Local Green Space

6.9. A consultation has recently been held on a revised NPPF which is a material consideration in the determination of the application. Policy W4 of the revised draft NPPF relates to water and wastewater infrastructure and states “In considering proposals for water supply, drainage and wastewater development, substantial weight should be given to:

- a) The benefits of providing the capacity needed to serve proposed development as well as improving security of supply and capacity for existing users; and
- b) Improving water quality and reducing water-borne pollution

## 7. Development Appraisal

### Principle of Development

- 7.1. The proposed sewer upgrades are required to address a risk of sewer flooding that has been identified in the network. The existing sewer that runs through Hazebrouck Meadows parallel to Park Lane has been identified as having insufficient capacity for peak flows arising from existing and future development within the area. Modelling has shown that there is a risk of surcharge from a number of manholes on the sewer with the most significant impact being at manhole SU77656202 which lies within the Hazebrouck Meadows SANG. There is therefore an elevated risk of sewer flooding within Hazebrouck Meadows SANG during a storm event and resulting pollution around the area of the manhole which would require remediation.
- 7.2. To address the risk of sewer flooding a online new tank sewer is proposed to increase the capacity within the network. Modelling has been undertaken to determine the optimum location for the tank sewer which needs to connect to the existing sewer. Options for connection are constrained by the route of the sewer through areas of new housing development and wooded amenity areas. To resolve the risk the tank sewer needs to be location north of Palmer Place. Two options for the location of the upgrades were identified that would mitigate the risk of sewer flooding as set out in Section 5 above. Both locations lie within the Hazebrouck Meadows SANG area. However, the proposed location has been selected as it would result in shallower excavations enabling the upgrades to be completed faster with less impact on the environment.
- 7.3. As set out below, the impacts on the area of SANG will be temporary and as the development will resolve a risk of sewer flooding, the development is therefore supported by Policies CP1 and CP3 of the Core Strategy, Policy CC01 of the MDDLDP, Policy AD4 of the Neighbourhood Plan and Policies FD1 and C8 of the LPU.

### Design and character of the area

- 7.4. The development not above ground level including the tank sewers, connection points and manhole covers are considered to be permitted development under Schedule 2, Part 13, Class B(a) of the Town and Country Planning (General Permitted Development) Order 2015. These elements will be at or below ground level and as such will have no material impact on the character of the area.
- 7.5. As a result of the shallow depth of the sewer network the proposals require earthworks to recontour the land to provide sufficient depth of cover above the new tank sewers. There are existing earth mounds within the area of SANG parallel with Palmer Place and the proposed earthworks will restore earth mounds following the development with minor changes to the profile of the land.
- 7.6. The area has been subject to recent tree planting in connection with the designation as a SANG. This tree planting will need to be removed to facilitate the works but will be replanted upon the completion of the development. There is limited existing planting n the vicinity of the proposed tank sewers which is predominantly laid as grass. The area will largely be restored as existing although some minor revisions to the area of tree planting is required to prevent planting taking place above the new below ground assets.

- 7.7. The only above ground structure required in connection with the development is a vent column. This asset will allow air to move in and out of the new tank sewer. The vent column is proposed to be 6m high which will ensure that air expelled from the tank sewer is dispersed at an elevated level avoiding odour impacts on users of the SANG. The original proposed location for the vent was close to the tank sewer. However, the design has been updated following the receipt of pre-application advice to locate the vent column further north ensuring it is located well away from the residential properties in Palmer Place. The vent column will be constructed from glass reinforced plastic and will be largely screened by tree planting within the SANG once the tree planting becomes more established.
- 7.8. The proposals will result in negligible impacts on the appearance of the area with the main impact being the provision of a single vent column which will be screened over time by tree planting. The vent column also has a similar appearance to other structures in the vicinity including telegraph poles and lamp posts. The design of the works is therefore considered to be appropriate to the location and the proposals comply with Policy CP3 of the Core Strategy.

#### Landscape and Trees

- 7.9. An arboricultural impact assessment has been undertaken in support of the application. The proposals will result in the removal of approximately 250 whips and young trees planted as part of the landscaping proposals for the SANG. The existing landscape is the subject of a Landscape Environmental Management Plan (LEMP) prepared as part of the residential development proposals for the former Reading Football Club Training Ground site. It is understood that the SANG land has now been handed over to Wokingham Borough Council who will be responsible for ongoing management of the SANG land.
- 7.10. Upon the completion of the development the area will be replanted with whips and young trees in accordance with a landscape restoration plan. This plan is currently being drafted for discussion with the Council to allow agreement and approval of the restoration proposals prior to the completion of the proposed network upgrades.
- 7.11. The proposals will result in changes to the ground levels in the area of the new tank sewers with manhole covers provided flush with the existing ground level. Other than the limited number of manhole covers and a vent column the rest of the construction area will be returned to grassland and tree planting areas upon the completion of the development. Drawing L795-IL-XX-100-DR-CE-0100 shows the extent of regrading works to provide required ground cover over the new assets while also showing the existing areas of young woodland planting. It also shows the required 3m buffer around the new assets where tree planting would need to be avoided which will necessitate some minor variations to the area of woodland planting upon reinstatement while clearly demonstrating that the majority of the working area can be restored as existing. Minor changes to the area of tree planting will enable the same number or more whips and young trees to be planted as part of the restoration of the land. The works will include the removal and replacement of existing dead planting.
- 7.12. A Landscape Visual Appraisal of the proposed works has been prepared and supports the application. The appraisal concludes that, given the immaturity of the vegetation being removed, and the commitment to reinstatement of the existing vegetation, impacts on landscape fabric and quality are low. Mature woodland and distant receptors remain unaffected, and the SANG continues to operate effectively as a designated recreational landscape. Overall, operational effects are small in scale, localised and compatible with the developing green-infrastructure character of Arborfield Green.

- 7.13. While the area is designated as an area of SANG, the majority of the SANG area will remain accessible during the delivery of the proposed development and there would be no reduction in the area of publicly accessible SANG following the completion of the development. The proposals will also help protect the SANG area from pollution by alleviating an identified sewer flooding risk which could impact on the SANG. Overall, the proposals comply with Policies CC03 and TB21 of the MDDLDP.

#### Ecology and Biodiversity Net Gain

- 7.14. A preliminary ecology assessment has been prepared to support the proposed development. The assessment identifies mitigation that will be required during construction to comply with legislative requirements. These mitigation works will be incorporated into the delivery of the scheme and incorporated in the Construction Environmental Management Plan (CEMP) for the project.
- 7.15. The Environment Act 2025 introduces a mandatory requirement for the delivery of Biodiversity Net Gain. The guidance for completion of the Statutory Metric confirms that you do not need to record a habitat as lost when there are temporary impacts to a habitat and the area can be restored to both:
- Baseline habitat type within two years of the initial impact; and
  - Baseline condition within two years of the initial impact
- 7.16. The proposed construction works are estimated to take 5 months to complete after which the area can be landscaped. A BNG metric has been completed which records the existing land as being neutral grassland in good condition with additional notes regarding the young tree planting that has been provided on the land. The habitat and tree planting have been provided as part of the SANG delivery to support residential development and mitigate impacts on the Thames Basin Heaths Special Protection Area.
- 7.17. In total the proposed works will result in the permanent loss of less than 5m<sup>2</sup> of habitat from the 8 access covers and the provision of a ventilation column. All other areas are intended to be restored as close as possible to the existing condition upon the completion of the works with top soil from the site being stored for re-use in the restoration of the site.
- 7.18. Due to the buffer zone for tree planting around the storage tanks the tree planting will require minor variations to the current layout. However, the same extent of tree planting can be provided upon the completion of the works with similar aged whips provided on site.
- 7.19. Given the young status of the existing planting and the short duration of works the proposals will enable the habitat to be restored to its existing condition within two years with the planting undertaken in the first planting season following the completion of the development. While there will be a small impact on the habitat as a result of the manhole covers and vent column the area of habitat lost will be small and well below the 25m<sup>2</sup> de minimis exemption for mandatory BNG. Given the above it is considered that the proposals may not result in a requirement for mandatory BNG. However, Thames Water would welcome further discussions with the Council over the proposed restoration of the land to confirm the position and ensure that the restoration proposals align with the Councils proposed management of the area of SANG.
- 7.20. The development will be undertaken in accordance with measures set out in the ecological appraisal ensuring that the proposals comply with Policy CP7 of the Core Strategy and Policy TB23 of the MDDLDP.

## Drainage and Flood Risk

- 7.21. The site is located in flood zone 1 as shown on the flood map for planning as shown in Figure 4 below. As a result the minor levels changes resulting from the development will have no adverse impact on the risk of fluvial flooding.

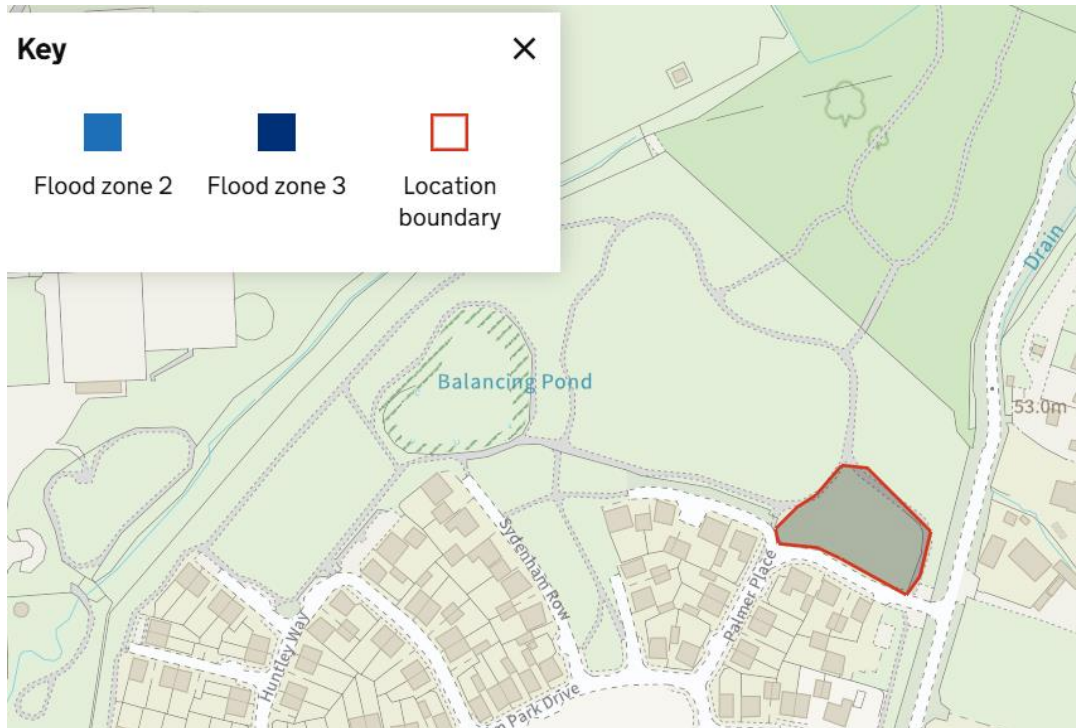


Figure 4: Fluvial Flood Risk (source: gov.uk)

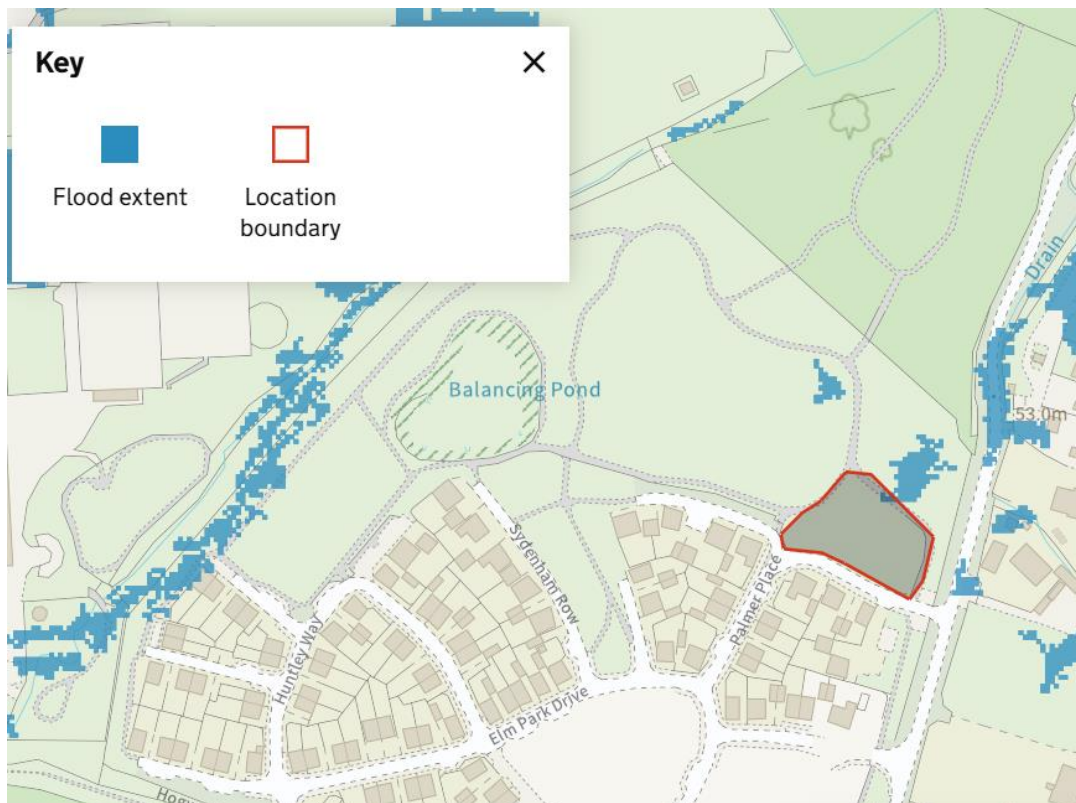


Figure 5: 1 in 30 yr Surface Water Flood Risk Area (Source: gov.uk)

- 7.22. The area of permanent works will have no impact on areas at risk of surface water flooding. No new areas of hardstanding will be provided avoiding any increase in runoff. While the new below ground structures will be designed to prevent the ingress of surface water, the ground above and around the assets will be permeable enabling surface water to infiltrate around the new assets and into the ground. There would therefore be no requirement for any surface water drainage measures as a result of the proposed development. An area of the temporary compound is shown as being at risk from surface water flooding. However, this area will be used temporarily restored upon the completion of the works and as a result there will be no permanent impact on surface water flood risk.
- 7.23. The proposed development is required in order to address the risk of sewer flooding and associated risk of pollution to the environment. As the development is designed to reduce the risk of sewer flooding the development is supported by Policies CP1 of the Core Strategy, CC09 and CC10 of the MDDL, AD4 of the Neighbourhood Plan and FD1 and FD2 of the LPU.

## 8. Conclusion

- 8.1. The proposed development is required to reduce the risk of sewer flooding from the foul sewer network. Modelling of the network has demonstrated the area at greatest risk of surcharging of the sewer is an area within the Hazebrouck Meadows SANG. To mitigate this risk additional capacity is proposed within the sewer network within the area of SANG immediately north of Palmer Place.
- 8.2. The impacts of the development will predominantly be temporary with the land being restored upon the completion of the development. The main visible changes will be revised ground levels with a total of 8 manholes flush with the finished ground level and a single ventilation column. The works are anticipated to take around 5 months to complete following which the area can be restored with replacement tree planting ensuring the level of tree cover is maintained with some minor changes to the layout of planting to avoid planting above new below ground assets.
- 8.3. The proposals will have no permanent impact on the function of the area of SANG and will provide environmental benefits by mitigating the risk of sewer flooding in the vicinity of the works. The development is considered to comply with relevant national and local policy and should be permitted to enable the important infrastructure upgrades to proceed.

## Appendix A – Site Photos



Photo 1: View east towards Park Lane



Photo 2: View south towards Palmer Place

