

The Planning Inspectorate
Room 3/05 Kite Wing
Temple Quay House (2 The Square) Temple
Quay
Bristol
Avon
BS1 6PN

Our ref: WA/2025/131906/01-L04
PINS ref: 3371069
LPA ref: **243099**
Date: 28 January 2026

Dear Sir/Madam

**Outline Application For The Proposed Erection Of Up To 111 No. Dwellings With
Associated Works, Parking, Landscaping, Publicly Accessible Open Space And Access
From Reading Road. (All Matters Reserved Except For Means Of Access.)
Land North Of Reading Road Arborfield**

The Environment Agency has been notified of this appeal which will be determined on the basis of an Inquiry. We therefore submit our statement in respect of the appeal (see this attached below). Should the Inspector have questions regarding the information provided in this statement we would be happy to answer them.

Yours faithfully,

Amy Richardson
Planning Advisor

E-mail: Planning_THM@environment-agency.gov.uk

TOWN AND COUNTRY PLANNING ACT 1990 APPEAL UNDER SECTION 78

Outline application for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from Reading Road. (All matters reserved except for means of access.)

Statement by the Environment Agency

Date: 28 January 2026

1. Introduction/background

- 1.1. This statement has been provided as we wish to make comments in relation to the refusal of a planning application, ref: 243099 (the application) by Wokingham Borough Council (the LPA).
- 1.2. We were notified of this appeal by Wokingham Borough Council on 3 December 2025 and provide this statement in relation to flood risk and nature conservation and ecology. Please note that this statement represents our position and therefore we will not be attending the Inquiry.
- 1.3. We support the LPA's refusal decision reason 6 in their decision notice 20 May 2025:
 - Reason for refusal 6: *"Part of a main river runs along the southern boundary and insufficient information has been submitted to demonstrate that the proposed development will not adversely impact on flood risk or the watercourse, contrary to policy CC10 of the MDD Local Plan, CP1 and CP3 of the Core Strategy, AD4 of the Arborfield and Barkham Neighbourhood Plan and section 14 of the NPPF."*
- 1.4. Please note that the Environment Agency is a non-departmental public body created by the Environment Act 1995. Its principal functions are set down in that Act. By virtue of the Schedule 5 to the Town and Country Planning (Development Management Procedure) (England) Order 2010 ('DMPO'), it is a statutory consultee in respect of proposed development (other than minor development) which is to be carried out on land in an area within Flood Zones 2 or 3. Therefore Environment Agency's representations on this case relate to flood risk and therefore we support Wokingham Borough Council's refusal reason and provide this statement to support their decision. As stated in section 1.2, we also provide this statement as we wish to make comments in relation to nature conservation and ecology.

2. Proposed development/site description

- 2.1. The outline application is for the proposed erection of up to 111 no. dwellings with associated works, parking, landscaping, publicly accessible open space and access from Reading Road, with all matters reserved except for means of access.
- 2.2. In accordance with the Flood Map for Planning, the application site lies within Flood Zones 2 and 3, which is land defined by the Planning Practice Guidance (PPG) as having a medium and high probability of flooding respectively and a Main River runs across the southern boundary of the site, where a new access road is proposed.

3. Consultation

- 3.1. We were consulted on 11 December 2024 for comments on this planning application for residential development. We responded to the LPA on 23 January 2025 and objected to this development proposal due to the impact on the water environment from wastewater discharges. We did not provide any comments on flood risk because at this time the Flood Map for Planning showed the site entirely within Flood Zone 1.
- 3.2. In March 2025 we updated our Flood Map for Planning, which now shows the site partially within Flood Zone 2 and 3 (see appendix EA1). We were not re-consulted on this site between the update to the Flood Map for Planning in March 2025 and the council's decision on 20 May 2025. Given that flood risk has increased on site, we would now like to provide comments within this statement.
- 3.3. After being notified of this appeal by Wokingham Borough council, on 24 December 2025 we requested an updated Flood Risk Assessment, using the updated Flood Map for Planning (see appendix EA2). On 16th January 2026 we received an updated Flood Risk Assessment and SuDS Statement, prepared by Infra Engineering Practice Limited, referenced IEP_001_022_056, dated January 2026 for the LPA on the 16th January 2026, referred to hereafter as the 2026 FRA. We have now reviewed this and thank the appellant for producing it. We welcome that an assessment of the proposal against the updated Flood Map for Planning has now been completed and that an 8m easement either side of the watercourse will be maintained, however we still have concerns regarding the watercourse crossings. Please refer to our comments in section 4 below.
- 3.4. With regard to our wastewater objection, through our engagement with the Wokingham Borough Council on their local Plan review process, we are aware that Thames Water confirmed in December 2024 that Arborfield Sewage Treatment Works (STW) has a growth scheme in AMP8 to build capacity up to 2036. Thames Water have since approached the Environment Agency for pre-application advice for Arborfield STW although they have not provided reassurance that their growth scheme in AMP8, to build capacity up to 2036, is still on track. We stated at the local plan stage that the Environment Agency needs assurance from Thames Water that the funds are available and that the proposed works will be completed before, or in line with, Wokingham Borough Council's allocations such as Land to the north of Reading Road site being built/prior to being occupied. Without this reassurance the Environment Agency cannot be satisfied that there is sufficient sewerage capacity available to facilitate the plan's proposed development. In that regard, a planning **condition** which prevents occupation of any of the development until the planned upgrades at the Arborfield STW are completed to ensure that there is sufficient sewerage capacity to accommodate the development. This should be approved in writing by the local planning authority in consultation with the Environment Agency and the sewage undertaker. We have provided suggested condition wording in section 7 of this statement (condition 3) and we are happy to work with the LPA regarding any further suggested wording.

4. Planning Policies

- 4.1. The development which is subject to appeal is contrary to national and local planning policy with regard to flood risk and nature conservation and ecology:
- 4.2. The appellant has submitted inadequate information to determine the flood risk and nature conservation and ecology implications of their proposed watercourse crossings. The appellant needs to demonstrate that their proposed watercourse crossing adhere to the following policies:
- Paragraph 181 of the National Planning Policy Framework (NPPF), which states: *"When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere."*

- Policy CP1 Sustainable development point 9 of Wokingham Borough Council Local Development Framework Adopted Core Strategy Development Plan Document, adopted January 2010, which states *“Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater);”*
- Policy FD3 River Corridors and Watercourses of Wokingham Borough Council Local Plan Update 2023- 2040 Proposed Plan Submission, which states: *“1. Development proposals should conserve and enhance the function, character, setting, biodiversity and historical significance of rivers and water courses.*

2. Where appropriate, development proposals in vicinity to rivers and watercourses will be required to:

a) Meet the principles of high-quality design set out in PolicyDH1, having special regard to riverside setting and water frontage character, and consider views of the proposals from all public vantage points, including from the river or watercourse;

b) Maintain, and where possible enhance, public access for walking, wheeling and cycling (including Greenways, and Green Routes), and tourism and leisure activities, such as fishing and boating;

c) Maintain tree cover, conserve and enhance natural watercourse banks and their associated bankside and marginal vegetation and the ecological value of the area including its role as a wildlife network. Opportunities for the restoration and enhancement of natural elements of the environment should be incorporated within the design of developments proposals;

d) Provide or retain a minimum undeveloped buffer zone measured from the top of the river or watercourse bank at the point at which the bank meets the level of the surrounding land. A buffer of 8m should be provided for rivers. The buffer for watercourses should reflect the type, size and nature of the watercourse; and

e) Demonstrate how the development proposal will support the achievement of Water Framework Directive (WFD) objectives, and guidance set out in the Thames River Basin Management Plan or any local catchment management plans;

4. The culverting of any watercourses should be avoided where possible, and opportunities for the de-culverting of watercourses should be actively explored and pursued.”

5. Environment Agency’s case

Flood Risk Impacts

5.1. The site is located partially within Flood Zones 2 and 3, which planning practice guidance defines as having a medium and high probability of flooding respectively. Additionally, a Main River runs across the southern boundary of the site, where a new access road is proposed (see appendix EA1).

5.2. Having now reviewed the 2026 FRA we still have concerns regarding the watercourse crossings. Paragraph 7 of section 4.2 of the 2026 FRA states that new access is proposed as outlined on the masterplan.

5.3. The 2026 FRA does not provide any further details on what this new access will be. Based on the Flood Risk & Drainage Strategy, prepared by RCP Consulting Engineers,

referenced DANS-E254-274, dated November 2024, which stated there would be culverting, and no further information regarding the watercourse crossing in the 2026 FRA, we were working under the assumption that culverting was still being proposed. On 22 January we received an email from Ardent stating that they now intend to use clear span bridges (see EA3). We welcome this approach, although it would have been useful if this information was included in the 2026 FRA. Clear span bridges allow the watercourse to remain open and allow maintenance to take place more easily, which is why we strongly prefer them over culverting.

- 5.4. We also welcome that the bridge design will be set 600mm above the 1 in 100 year climate change fluvial flood level (also known as the 1% annual exceedance probability flood extent plus climate change), as this is what we would expect in order to allow flood water and floating debris to pass beneath the bridge and prevent blockages. This height can be calculated using detailed flood modelling, which shows the 1% annual exceedance probability flood level plus climate change allowance. This means that where there is detailed flood modelling for a site, it is not normally necessary for applicants to undertake their own. Unfortunately, we do not hold any detailed modelling in this location. This means that the appellant is correct, detailed modelling needs to be undertaken to determine the level the soffit height needs to be set at.
- 5.5. We note that within this email (appendix EA3) Ardent state that the model will not be submitted as part of the appeal process. It is our understanding that this is an outline application with all matters reserved except for means of access. As a result, we would expect plans on the bridge design to be submitted for review alongside the modelling used to inform the design.
- 5.6. Without detailed flood modelling, the appropriate soffit height for the bridge can't be determined, as a result we cannot be certain access arrangements won't increase flood risk onsite or elsewhere and the proposal may therefore be contrary to paragraph 181 of the NPPF and Core Strategy Policy CP1.

Nature conservation and ecology impacts

- 5.7. Watercourses are important linear features of the landscape, including as wildlife corridors, and should be maintained as continuous corridors to maximise their benefits to society. Clear span bridges allow this and are also supported by Policy FD3 of Wokingham's Emerging Local Plan, which states culverting should be avoided where possible and outlines that proposal should enhance river and watercourses biodiversity and maintain their role as a wildlife network. They achieve this when the bridge abutments are set beyond the top of the bank to protect the bankside habitat. This is defined as the point at which the bank meets the level of the surrounding land. We would expect the bridge to be designed in this way.

Information required to overcome our concerns

- 5.8. We do not currently have enough information to determine the flood risk and nature conservation and ecology implications of the proposed access arrangements. To overcome this, we require detailed flood modelling to be undertaken and submitted, alongside plans for the design of the proposed clear span bridges. The bridges design should have a soffit height of 600mm above the 1% annual exceedance probability flood extent plus climate change, informed by the flood modelling.
- 5.9. Please note that we expect a detailed model review to take a minimum of 29 calendar days, although they often take longer than this and require more than one review before they are found satisfactory.

6. Summary/conclusion

6.1. In summary, whilst we welcome that clear span bridges are intended to be used, we do not have enough information to determine the flood risk and nature conservation and ecology implications of the proposed watercourse crossings. Without the submission of additional information, we cannot be certain the proposed access isn't contrary to NPPF paragraph 181, Core Strategy Policy CP1 and Emerging Local Plan Policy FD3.

7. Planning conditions (if you are minded to uphold this appeal)

7.1. If the Inspector is minded to uphold the appeal, then the Environment Agency requests that the following conditions are imposed on any planning permission granted to minimise the environmental impacts caused by the development. Please note, these conditions are given on a without prejudice basis.

Condition 1

No development approved by this planning permission shall commence until such time as a scheme for the design of the watercourse crossing over the main river has been submitted to, and approved in writing by, the LPA. The design shall include:

- bridges of clear span design, with abutments set back from the bank to allow for maintenance and improvement works and provide suitable space to allow mammals to pass.
- the soffit (underside) of the bridge set at least 600mm above the 1% AEP plus an appropriate allowance for climate change flood level to allow flood water and floating debris to pass beneath the bridge, to prevent blockages.
- demonstrate that the design will not cause flooding upstream, downstream or onsite.

Reason

To reduce the risk of flooding to the proposed development and its future users, in accordance with paragraph 181 of the NPPF and Core Strategy Policy CP1.

Condition 2

No development shall take place until a scheme for the provision and management of a 8 metre wide buffer zone alongside the watercourses has been submitted to, and approved in writing by, the LPA. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the LPA. The buffer zone scheme shall be free from built development including lighting, domestic gardens, non-native plant species and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme (these should only be native species, ideally of local provenance)
- details demonstrating how the buffer zone will be protected during development with the production of a Construction Environment Management Plan
- details demonstrating how the buffer zone will be protected over the longer term with the production of a Landscape and Ecological Management Plan. This should include adequate financial provision and named body responsible for management
- details of any proposed footpaths, fencing, lighting, outfalls etc. New outfall structures should follow best practice design and be set back from the bank as far as is practical.
- details of any watercourse crossings. Watercourse crossings should be clear span bridge crossings unless it can be clearly demonstrated why culverting is both necessary and the only reasonable and practicable alternative. Bridge abutments should be set beyond the top of the bank to allow a wildlife corridor between the river and the abutments. A full ecological assessment of the river should also be carried out prior to the construction of any crossing with appropriate avoidance, mitigation or compensation measures in place in order to safeguard any protected species that are present.

Reason

Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected.

This approach is supported by paragraphs 187 and 193 of the NPPF which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

The approach is also supported by Section 40 of the NERC Act 2006 as amended by section 102 Environment Act 2021, which establishes a general duty on public authorities, to conserve and enhance biodiversity through the exercise of its functions.

It is also supported by Local Plan policy CP7 which states that development should take account of the biodiversity, and where possible developments should contribute to the enhancement of the borough's biodiversity.

Condition 3

No development approved by this permission shall be commenced until a scheme for the improvement of the sewerage system to accommodate the additional wastewater flows from the development has been submitted to and approved in writing by the local planning authority.

The scheme shall be implemented as approved. No occupation of buildings allowed by this permission shall occur until either the approved scheme for improvement of the sewage system has either been completed or in line with the phasing plan set out within the scheme.

Reason

To reduce the risk of environmental harm by creating additional wastewater capacity before buildings are occupied, reducing the likelihood of spills/release of untreated foul waste into the environment. This condition is in accordance with paragraph 187 (e) of the NPPF.

8. Advisories

Flood Risk Activity Permit

The applicant will require a Flood Risk Activity Permit (FRAP) to undertake the proposed works as a designated main river runs adjacent to and through the site and access roads are proposed over them.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river

- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](#) or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Appendices

Appendix EA1 – Flood Map for Planning

Appendix EA2- Environment Agency December 2025 response

Appendix EA3- email from Ardent regarding Flood Modelling