

Wokingham Borough Council
Development Control
PO Box 157
Wokingham
Berkshire
RG40 1WR

Our ref: WA/2025/131906/01-L05
PINS ref: 3371069
LPA ref: 243099
Date: 06 March 2026

Dear Joanna

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

Following our statement dated 28 January 2026, we received an email from the appellants stating they proposes to use the existing culvert as access and not a clear span bridge. We subsequently attended a meeting with appellants and the Local Planning Authority to gain further clarity on this matter, where we asked the appellants to provide a technical note confirming their position. We received this on 3 March 2026 (referenced IEP/001/022/068) and provide this addendum to our statement in response to it.

The technical note refers to the culvert being in 'reasonably good' condition aside from 2 displaced joints. However, the length of culvert that will be crossed by the access could not be assessed in depth due to the camera being underwater for this stretch. The applicant has suggested that another survey could be carried out during a drier period. **We agree that this additional survey should be carried out to fully assess the condition of the existing culvert.**

The technical note also refers to the possibility of replacing the culvert in a like- for-like manner. While this could be appropriate, **investigations should be undertaken to assess if there is the possibility for betterment.** As stated in our email response sent 24 December 2025 and our statement dated 28 January 2026, we are opposed to culverting in most situations and prefer other options, such as clear span bridges. This is because:

- a culvert by its nature acts as a constriction on a watercourse and can increase the upstream water level (and also flood risk) in conditions of high flow. This needs to be assessed to ensure flood risk is not increased elsewhere.
- a culvert carries a greater risk of blockage than an open channel, with consequent increased flood risk. Blockage will need to be assessed when considering new culverts. If modelling has been undertaken to assess the

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proposed culvert, blockage scenarios should be undertaken and adjustments to the design adjusted accordingly.

- culverts are more difficult to maintain and repair than a natural watercourse. We would expect to see maintenance considered and may request a planning condition requiring a maintenance plan to be submitted.

Additionally, alongside the flood risk implications, we are also opposed to the culverting of any watercourse because of the adverse ecological, geomorphological, human safety and aesthetic impacts. 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. Culverting damages habitats, interrupts wildlife corridors and disrupts river habitat continuity. This is why we have previously requested that the proposals are revised by designing clear span bridges in place of the culverts so that a continuous river corridor can be maintained. This is supported by Policy FD3 River Corridors and Watercourses of Wokingham Borough Council Local Plan Update 2023- 2040 Proposed Plan Submission, which states: *“The culverting of any watercourses should be avoided where possible, and opportunities for the de-culverting of watercourses should be actively explored and pursued.*

We also believe that other areas of culverted watercourse may fall within the appellants red line boundary. If this is the case, **we would strongly recommend that these are de-culverted as part of any proposed landscaping scheme**, in line with this policy.

In the case of the survey indicating the culvert condition is unsuitable, and the use of a clear span bridge is **robustly justified** by the appellant to not be possible, the appellant should replace the existing culvert with the most appropriate culvert, proportionate to the proposed access road (providing the replacement culvert is no smaller than the existing). One example of this would be a bottomless culvert.

Whilst the appellants are correct that the final details of the crossing will need to be provided during the Flood Risk Activity Permitting (FRAP) process, access also forms part of the planning application and as such needs to be submitted to the Local Planning Authority for approval as part of this planning application.

We welcome the submission of the technical note and accept that in principle access can be provided over the main river, however **we still do not have enough information on the details of how this access will be provided**. We also believe that **inadequate consideration has been given to exploring a better, more suitable design for the crossing with regards to flood risk and biodiversity**.

Consequently, the outline planning permission will only be acceptable if the following **planning condition** is included. Without the inclusion of this condition we would object to this planning application as submitted.

Condition 1

The development hereby permitted must not be commenced until such time as a scheme showing the design of the access road has been submitted to, and approved in writing by, the LPA. This should include:

- Details of a survey undertaken of the existing culvert during a drier period to allow the culvert's condition to be assessed fully in order to inform the watercourse crossing design.
- Details of the proposed watercourse crossing (the preference is a clear span bridge and only when there is robust justification that this is not feasible should a culvert be considered)

- Details outlining measures taken by the watercourse crossing to ensure opportunities to improve flood risk or mitigate against the impact of flood risk.
- Details outlining measures taken to promote an ecologically enhancing watercourse crossing feature with the aim of ensuring biodiversity onsite are fully protected and enhanced.

The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the LPA.

Reasons

To ensure the proposed access does not adversely affect the stability of the existing culvert which will compromise its function and may increase flood risk in line with NPPF paragraph 181 and Core Strategy Development Plan Policy CP1. This is required because culverting restricts watercourses and increases the risk of blockages, causing increased upstream water levels, particularly in conditions of high flow. They are also more difficult to maintain than bridges.

It will also ensure any opportunities for the restoration and enhancement of natural elements of the environment should be incorporated within the design of developments proposals and allow opportunities for the de-culverting of watercourses to be actively explored and pursued in line with Policy FD3 River Corridors and Watercourses of Wokingham Borough Council Local Plan Update 2023- 2040 Proposed Plan Submission. This will allow the watercourse to be maintained as a continuous corridor, in order to maximise its benefits to society and prevent interruptions to the wildlife corridor and river habitat wherever possible.

We would be happy to provide further support to the Local Planning Authority on the wording of our recommended conditions and/ or attend any round table taking place at the end of the Inquiry regarding conditions. For completeness, please find below the other conditions we recommend be attached to this planning application:

Condition 2

No development shall take place until a scheme for the provision and management of an 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 (as agreed with the LPA)

No dwelling hereby approved shall be occupied until either:

- A. A confirmation has been provided to the Local Planning Authority that foul water capacity exists off site to serve the development; or
- B. A development and infrastructure phasing plan has been submitted to and approved in writing by the Local Planning Authority in consultation with the Environment Agency and Thames Water. Where a development and infrastructure phasing plan is approved, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan; or
- C. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

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. In accordance with paragraph 187(e) of the NPPF.

Closing comments

Please provide our comments to the Planning Inspector for their consideration.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact the advisor identified below.

Yours sincerely

Miss Amy Richardson
Planning Advisor

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