

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

Our ref: WA/2024/131796/03-L01
Your ref: 242063

Dear Sir/Madam

Full Application For The Material Change Of Use Of Land From Agricultural To Provide An Enlarged Caravan Site And Alterations To Provide 4 Additional Pitches (Total Of 6 Pitches) With Associated Hardstanding And Ancillary Day Rooms.

Wind In The Willows, Islandstone Lane, Hurst, Wokingham RG10 0RJ

Thank you for reconsulting us on this application on 28 August 2025. Further to our previous response (letter with reference WA/2024/131796/02-L01, dated 6 August 2025) additional information has been submitted. We have reviewed the information in line with our planning remit:

- Technical Note (dated 12 August 2025 and prepared by Flume Consulting Engineers)
- Comments provided from White Planning and Enforcement via email on 19 August 2025.

We updated our flood risk information in early 2025 as part of our new national flood risk assessment (NaFRA2). We have used new and improved methods to update our assessment of flood risk across England. This has led to updated flood risk ratings in many locations.

As stated in our previous response, the application site now lies within Flood Zones 2 and 3 in accordance with the Flood Map for Planning. Flood Zones 2 and 3 are defined by the National Planning Policy Framework (NPPF) and associated Flood risk and coastal change Planning Policy Guidance (PPG) as having a medium and high probability of flooding. In addition, the application site lies within the 3.3% annual exceedance probability (AEP) flood outline which is identified by the Wokingham Borough Council Strategic Flood Risk Assessment (SFRA), dated May 2023, as within

On 25 March 2025, we published updated Flood Zones alongside other datasets for use in development. Planners and flood risk professionals – find out more at [Development planning \(including Flood Map for Planning\)](#). Guidance for developers is available through the [Town and Country Planning Association](#) [New national flood and coastal erosion risk information - Town and Country Planning Association](#)

Flood Zone 3b (the functional floodplain).

Environment Agency position

The submitted Technical Note (dated 12 August 2025 and prepared by Flume Consulting Engineers) and comments provided from White Planning and Enforcement via email on 19 August 2025 do not satisfactorily address our earlier concerns. We therefore **maintain our objections** set out in our response dated 6 August 2025.

Please be aware that the Technical Note focuses on the use of the Loddon (Lower) 2009 model to assess flood risk in this location and states this is the 'hydraulic model for this river reach and remains the underlying source of the current Flood Map for Planning outputs' This is factually incorrect. The New National Model (NNM) informs the Flood Map for Planning in this location, and the watercourses adjacent to the application site are not included in the Loddon 2009 model.

Objection 1 - Flood risk vulnerability category inappropriate to the Flood Zone

The applicant is relying on data from the Loddon (Lower) 2009 detailed model to try to show the site is not in Flood Zones 3a or 3b. However, it is not appropriate to use the Loddon 2009 model to inform an FRA in this location.

The Loddon 2009 model does not appropriately cover the site. The application site is at flood risk from the Kayersbridge Brook, which was not included in the Loddon 2009 model. It can clearly be seen from the Loddon 2009 modelled flood extents that this model does not appropriately cover this site. There is no flood risk shown in the Kayersbridge Brook river channels except in the 0.1% AEP flood extent. Also, all extents except the 0.1% AEP only extend a little way up the Kayersbridge Brook. These extents from the Loddon 2009 model are only showing flood risk from the Billingbear Brook backing up the Kayersbridge Brook and are not representative of flood risk from the Kayersbridge Brook itself. There are also records of historic flooding in this location.

There is no detailed local modelling available for the application site. The only modelling available for the Kayersbridge Brook is our New National Model (NNM). The NNM shows the site to be within, and surrounded by, the 3.3% AEP and so we identify this site as within Flood Zone 3b. The site is also in the 1% AEP in accordance with the NNM and so is within Flood Zone 3a. Highly vulnerable development is not compatible in Flood Zones 3a or 3b and therefore should not be permitted.

Overcoming our objection 1

To overcome our objection, the applicant would need to clearly demonstrate through detailed modelling and a topographical survey that the proposed development site is located outside of Flood Zones 3a and 3b. Alternatively, the applicant would need to ensure there is no increase in the number of people, uses and units located in the floodplain.

Objection 2 – Inadequate FRA

We are still not satisfied that it has been demonstrated that the development would be safe without increasing flood risk elsewhere. Whilst we welcome that site specific topography has been included in the assessment, incorrect flood risk information is used as set out above. We have provided further information on our concerns with the applicant's flood risk assessment below.

Flood risk information

It is not appropriate for the Loddon (Lower) 2009 model to be used to inform an FRA in this location. Please see our comments under Objection 1 for more information on this point.

If the applicant wishes to continue with the development as currently proposed, they will need to undertake modelling. This modelling would be to challenge the NNM, which shows the site at high flood risk and so the proposals are inappropriate. We would also expect detailed modelling to be undertaken due to the scale, nature and location of the proposed development to better understand flood risk on site. A range of flood events including the following would need to be modelled:

- 3.3% annual exceedance probability (AEP)
- 1% AEP
- 1% AEP plus an appropriate allowance for climate change
- 0.1% AEP

Please see River modelling: technical standards and assessment - GOV.UK for further guidance on how to produce a fluvial flood model. We will need to review and sign off any flood modelling to ensure it is fit for its intended use.

Should any modelling undertaken by the applicant be agreed with us, a comparison should be made between the modelled flood levels and a detailed topographic survey. This will help establish the likely flood extents. The proposed scheme should then be designed considering agreed flood extents and levels.

Climate change

The Technical Note sets out that a 14% allowance for climate change is required, which is the Loddon and tributaries 2080's Central allowance. This would only be acceptable if the applicant is able to demonstrate through detailed modelling that the site is outside the 1% AEP flood extent (used to define Flood Zone 3a).

With the release of the NNM in March 2025, the site is now shown to be within the 3.3% AEP flood extent. The development is inappropriate for the Flood Zone, so in accordance with Flood risk assessments: climate change allowances - GOV.UK, if the LPA were to consider highly vulnerable development appropriate, the higher central allowance would be needed.

Safety of the development

The design flood level for this site has not been agreed, so it has not been demonstrated that finished floor levels can and will be set above the design flood level. In addition, incorrect data has been used to inform the applicant's assessment of access and egress route. Therefore, we are not satisfied that future occupants will be safe for the lifetime of the development. There would be an unacceptable risk to the health and safety of the occupants in a flood event.

Flood risk elsewhere

No new information on the proposed works has been provided. The applicant has only tried to demonstrate the site is outside the design flood extent. However, they refer to inappropriate data as set out above.

The proposed development, which includes new buildings/structures and potentially land raising in the floodplain, will result in a loss of floodplain storage and will impede flood flow within the 1% AEP flood extent with an appropriate allowance for climate

change. The proposed development will therefore increase the risk of flooding both onsite and elsewhere which is contrary to paragraph 181 of the National Planning Policy Framework and adopted policy CP1 in the Wokingham Borough Core Strategy (January 2010).

A mixture of voids and floodable structures are proposed to mitigate for an increase in built footprint within the 1% annual exceedance probability (AEP) flood extent with an appropriate allowance for climate change. This is not appropriate and level for level compensation is required. Voids are not an appropriate form of mitigation in accordance with paragraph 049 of the Planning Practice Guidance which states stilts and voids 'should not normally be relied upon for compensating for any loss of floodplain storage'. This is because voids do not allow water to freely flow through them, they have limited capacity, it is difficult to stop them being used for storing belongings or other materials and voids can get silted up and/or blocked. Floodable structures also not appropriate for similar reasons.

Overcoming our objection 2

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above and in our previous letter dated 6 August 2025.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Level for level compensation

Any increase in built footprint or raising of ground levels should be compensated up to the 1% AEP plus an appropriate allowance for climate change flood level. Level for level floodplain compensation is the preferred method of mitigation and should be considered within the FRA.

Level for level floodplain compensation is the matching of floodplain storage volumes lost with new floodplain storage volume gained through the reduction of ground levels. We recommend that level for level floodplain storage calculations are provided in a table that sets out the change in volumes across the site using 100mm or 200mm slices (dependent on site specific considerations), stating the losses and gains for each slice. It will need to be demonstrated that there would be no net loss in storage volume for any slice. The location of the changes in floodplain storage should also be clearly identified in a plan or drawing that demonstrates the scheme would be hydraulically connected for each slice.

Excavation of the proposed floodplain compensation scheme should be completed prior to the construction of development to ensure floodplain capacity is maintained.

Advice to applicant – Environmental Permitting

The applicant will require a Flood Risk Activity Permit (FRAP) to undertake the proposed works as the main river runs adjacent to the site. The applicant would need to demonstrate that the proposed works will not adversely impact on flood risk or the watercourse.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16

metres if tidal)

- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

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.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> 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.

Advice to applicant – foul drainage

Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
3. Septic Tank

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2010 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, addition to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are in a position to decide whether to grant a permit or not.

Domestic effluent discharged from a treatment plant/septic tank at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24 hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.

A soakaway used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul soakaway and not less than 50 metres from the nearest potable water supply. Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential

increase in flow and loading which may occur as a result of the development. Where the existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit.

Further advice is available at:

[Septic tanks and treatment plants: permits and general binding rules](#)

Advice to LPA – Sequential Test

What is the sequential test and does it apply to this application?

In accordance with the National Planning Policy Framework (paragraph 173), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test and:
 - the proposed development is consistent with the use for which the site was allocated; and
 - there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test
- Developments where no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future.

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

Who undertakes the sequential test?

It is for you, as the local planning authority, to determine an appropriate area of search and to decide whether the sequential test has been passed, with reference to the information you hold on land availability. You may also ask the applicant to identify any other 'reasonably available' sites which are on the open market and to check on the current status of identified sites to determine if they can be considered 'reasonably available'. Further guidance on the area of search can be found in paragraphs 027-030 of the planning practice guidance [here](#).

What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance [here](#).

Advice to LPA - Safe access and egress

In accordance with paragraph 181 of the National Planning Policy Framework (NPPF), you must ensure that the 'development is appropriately flood resilient and resistant, and safe access and escape routes are included where appropriate...' This is on the understanding that you have concluded that the proposed development has passed the flood risk sequential test.

Within the application documents the applicant should clearly demonstrate to you that a satisfactory route of safe access and egress is achievable. It is for you to assess and determine if this is acceptable.

Advice to Applicant - Other Consents

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing. Please see <http://www.environment-agency.gov.uk/business/topics/permitting/default.aspx>

Final comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of condition(s) on any subsequent approval.

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

Yours faithfully

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