

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

Our ref: WA/2025/132493/02-L01
Your ref: 251907
Date: 03 November 2025

Dear Sir/Madam

**Full Application For The Erection Of An Electricity Transformer And Housing Enclosure, Following Demolition Of Existing Smoking Shelter.
Crane House And Unit 1 The Business Cent Molly Millars Lane Wokingham RG41 2RZ**

Thank you for consulting us on the amended plans. We have reviewed the Flood Risk Assessment – Transformer, Crane House, Molly Millar's Lane, Wokingham, Berks, RG41 2QP – Ref: 6314-MILL-ICS-XX-RP-C-07.001. (26th September 2025) Prepared by Infrastruct CS Ltd.

Environment Agency Position

The updated FRA (ref: 6314-MILL-ICS-XX-RP-C-07.001. [26th September 2025]) does not satisfactorily address our earlier concerns. We therefore maintain our objection set out in our response dated 3rd September 2025.

Reasons

The submitted FRA has addressed our concerns regarding the use of incorrect climate change allowances. The applicant has adjusted their data and re-plotted Flood Zones 2 and 3 onto their topographical map which is appropriate. However, the applicant has not addressed the extent of the design flood on site and the need for floodplain compensation. This was included within the Advisory Note within our last response.

From the provided updated topographical map with flood zones overlain, it is illustrated that the design flood level of 50mAOD would impact the location of the proposed electricity transformer. As the designs show a solid structure, this would be considered an increase in built footprint on site which would require floodplain compensation.

Overcoming Our Objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

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.

Specifically, the FRA will need to:

- demonstrate that any loss of floodplain storage within the 1% AEP plus an appropriate allowance for climate change can be directly compensated for to prevent an increase in flood risk elsewhere

Floodplain storage- advisory note

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 (the design flood level). This is necessary to prevent the proposed development reducing floodplain storage and displacing flood waters, thereby increasing flood risk elsewhere.

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. Please note for this to be achievable it requires land on the edge of the floodplain and above the 1% annual exceedance probability (AEP) flood level with an appropriate allowance for climate change to be available. A comparison of ground levels (from a topographical survey) with modelled floodplain levels will show if land is available above the 1% AEP flood level with an appropriate allowance for climate change to be used as compensation.

We recommend that level for level floodplain storage calculations are provided in a table that sets out the volume of floodplain storage lost (cut) and the volume of floodplain storage gained (fill) for each of the slices. Typically, the thickness of a slice should be 100mm or 200mm, dependent on-site specific considerations. This may vary in the case of large, very flat sites, where 0.05 metres could be used; or in very steep sites with a high range of flood water levels. Slice thickness should be set to provide 10 to 15 slices in these cases. It will need to be demonstrated that there would be no net loss in storage volume for any slice.

A location plan that corresponds with the table should also be submitted showing where the compensation will be located on site. The location of the changes in floodplain storage should be clearly identified, demonstrating the scheme would be hydraulically connected for each slice. It is not acceptable to propose works several kilometres away or separated from the site by a significant structure such as a weir, bridge or other obstruction.

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

If this cannot be achieved, then the applicant may need to amend the development to ensure that there will be no increase in flood risk elsewhere (for example by reducing built footprint or amount of land raising proposed).

Land contamination

The current or previous use(s) of the development site relating to engineering works relating to electrical and electronic manufacturing, suggest that the land may be affected by contamination. Land contamination can harm human health, soils, ecosystems, property, drinking waters supplies, groundwater and surface water.

Land contamination is a material planning consideration. The planning decision should ensure that the site is suitable for its proposed use, considering any risks from

contamination and any proposed land remediation. The planning application should therefore be supported by adequate site investigation information, prepared by a competent person. After remediation is carried out, as a minimum, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. This approach is supported by paragraph 196 of the National Planning Policy Framework.

The current or previous use(s) of the site may present an unacceptable risk of contamination that could be mobilised during site works and construction, potentially leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A.

As such, **should our flood risk objection be overcome, we will request that a groundwater and contaminated land condition is applied.**

Where a site is affected by contamination responsibility for securing a safe development rests with the developer and/or landowner. Developers should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the contaminated land pages on gov.uk for more information

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. Please quote our reference number in any future correspondence.

Yours faithfully

Miss Amy Richardson
Planning Advisor

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