

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

Our ref: WA/2025/132821/01-L01
Your ref: 253071
Date: 07 January 2026

Dear Sir/Madam

**Application For Approval Of Reserved Matters Pursuant To Outline Planning Consent 232704 Comprising Details Of 75 Homes, Together With Associated Internal Access Roads, Parking, Public Open Space, Landscaping And Sustainable Drainage Systems (SuDS). Details Of Appearance, Landscaping, Layout And Scale To Be Considered.
Land To West Of Park Lane, Charvil, RG10 9TS**

Thank you for consulting us on the application noted above, on 18th December 2025. We have reviewed the information submitted with this application with regard to our planning remit.

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.

The application site now lies partly 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.

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in Flood Risk and Coastal Change planning practice guidance. See:

- [What is a site-specific flood risk assessment?](#)
- [What level of detail is needed in a site-specific flood risk assessment?](#)
- [Site-specific flood risk assessment: checklist](#)
- [Flood risk assessment: Flood Zones 1, 2, 3 and 3b – Environment Agency guidance](#)

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](#)

The FRA does not therefore adequately assess the flood risks posed by the development.

Whilst the submitted FRA acknowledges that part of the site is within Flood Zones 2 and 3, no assessment of the proposed works in relation to fluvial flood risk has been undertaken. Works appear to be proposed in and/or near Flood Zones 2 and 3. In addition, the impacts of climate change on flood risk have not been assessed and the design flood extent has not been identified.

It is not clear if any 'more vulnerable' works (as defined in Annex 3 of the NPPF) are proposed within floodplain. In addition, surface water flood risk mitigation appears to be proposed in the fluvial floodplain, which is not appropriate. The flood risk impacts of the proposed development are therefore not known.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA that complies with the requirements for site specific flood risk assessments. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Flood risk information

Since 25 March 2025, a new national model (NNM) is available which provides flood risk information in this location. The NNM provides information on the 3.3% AEP (used to inform Flood Zone 3b) and climate change. Therefore, any amendment or further applications on this site will need to consider this new data set within an FRA. More information on this new dataset can be found here: [Updates to national flood and coastal erosion risk information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/updates-to-national-flood-and-coastal-erosion-risk-information).

There is currently no detailed local modelling available in this location, only the national modelling (NNM). To better understand potential risks, we recommend that the applicant undertakes detailed flood modelling to inform their site-specific Flood Risk Assessment (FRA). Given the location of this proposal, we would accept basic flood modelling to assess flood risk on this site in this instance, should it be demonstrated that all works are to be set outside the floodplain.

It will be necessary to determine the likely level of flooding at this site. Undertaking some flow analysis and basic modelling may be appropriate to establish this level. Alternatively, conservative flood levels for the 3.3% annual exceedance probability (AEP) and the design flood level could be agreed using information available on the Flood Map for Planning alongside a site-specific topographical survey. Based on these agreed levels, the proposed development should then be designed accordingly.

Climate change

There is no assessment of the impact of climate change using appropriate climate change allowances. Without an assessment on the impacts of climate change on flood risk, the risk to people and property in this location over the lifetime of the development is not known.

Refer to '[Flood risk assessments: climate change allowances](#)' to determine which allowances should be used to assess future flood risk for your development and location. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation

measures. Where assessment shows flood risk increases steadily and to shallow depths, it is likely to be more appropriate to choose a flood level lower in the range. Where assessment shows flood risk increases sharply due to a 'cliff edge' effect caused by, for example, sudden changes in topography or defences failing or overtopping, it is likely to be more appropriate to choose a flood level higher in the range.

Floodplain storage

Any loss of floodplain storage 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.

Boundary treatments

Walls and fences can have a significant impact on the flow and storage of flood water, especially if they are constructed across a flood flow route. This can lead to higher levels of flood water on the upstream side of the fence or wall which will potentially increase the flood risk to nearby areas. Therefore walls and fences should be permeable to flood water. We recommend the use of post and rail fencing, hit and miss fencing (vertical slats fixed alternately on each side of horizontal posts) or hedging.

Flood warning and emergency response

Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood.

Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 (inc. footnote 63) of the NPPF and the guiding principles of the PPG.

The flood risk assessment does not assess access and escape routes. Likely duration, depths, velocities and flood hazard rating against the design flood for the proposal have not been provided.

This does not mean we consider that the access is safe, or the proposal is acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuations.

Advice to LPA

If you are minded to approve this application for major development contrary to our flood risk objection, we request that you contact us to allow further discussion and/or representations from us in line with the [Town and Country Planning \(Consultation\) \(England\) Direction 2024](#).

This Direction prevents you from issuing planning permission without first referring the application to the Secretary of State for Housing, Communities and Local Government (via the National Planning Casework Unit) to give them the opportunity to call-in the application for their own determination. This process must be followed unless we are able to withdraw our objection to you in writing. A failure to follow this statutory process could render any decision unlawful, and the resultant permission vulnerable to legal challenge.

Please re-consult us if further relevant information is submitted. We will aim to provide comments within 21 days of re-consultation.

Yours faithfully

Miss Amy Richardson
Planning Advisor

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