

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

Our ref: WA/2024/131819/01-L01
Your ref: 242418
Date: 15 January 2025

Dear Sir/Madam

Full Application For A Change Of Use From Offices (Use Class E(G(I)) To A Patient Transport Service Building (Use Class Sui Generis), Along With The Extension Of The Existing Car Park To Provide An Additional 5no. Parking Spaces

Cousins House, 1-3 Reading Road, Finchampstead, Wokingham, RG27 0RP

Thank you for consulting us on this application on 4 November 2024. Apologies for the delay in providing this response. We have reviewed the information provided in line with our planning remit.

This site is located within Flood Zone 3 according to the Flood Map for Planning. This is defined as areas having a high probability of flooding in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance (PPG). The proposals include works in proximity to a designated main river.

Environment Agency Position

We have **two objections** to the application relating to 1) lack of flood risk assessment and 2) insufficient ecological assessment. We recommend that planning permission is refused.

Objection 1

In the absence of a flood risk assessment (FRA) we **object** to this application.

Reason 1

The application site lies within Flood Zone 3, which is land defined by the planning

NaFRA2 is coming! In **Spring 2025**, the Flood Map for Planning will be updated with new flood zone data. More information is available here: [Updates to national flood and coastal erosion risk information - GOV.UK](#). Please read this guidance at your earliest opportunity to prepare for the NaFRA2 changes!

practice guidance as having a high probability of flooding. The National Planning Policy Framework (paragraph 181, footnote 63) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

Overcoming our Objection 1

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted.

Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

Objection 2

The submitted planning application and associated documents indicate that the proposed development may cause significant loss of riparian semi-natural habitat on the banks of the River Blackwater.

We do not have enough information to know if the proposed development can meet our requirements for nature conservation because inadequate assessment of the risks has been provided. We therefore object to the proposal and recommend that the planning application is refused.

Reason 2

An ecological assessment is required to assess how the proposal will affect species and habitats. This assessment will need to demonstrate how this risk will be controlled. Where possible, it should identify opportunities for environmental improvements. Until this is provided the risk posed by the proposed development is unacceptable.

This objection is supported by paragraphs 187 and 193 of the National Planning Policy Framework (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. Opportunities to incorporate biodiversity in and around developments should be encouraged.

Overcoming our objection 2

To overcome our objection, the developer will need to carry out and submit a River Condition Assessment prior to the development of any detailed plans.

The survey and ecological assessment should:

- identify the impacts to the ecological and hydromorphological elements and determine if they may be at risk of deterioration
- identify any rare, declining, protected or otherwise important flora, fauna or habitats within the site

- assess the importance of the above features at a local, regional and national level
- identify the impacts of the scheme on those features
- demonstrate how the development will avoid adverse impacts
- propose mitigation for any adverse ecological impacts or compensation for loss
- propose wildlife/habitat enhancement measures.

Please reconsult us any surveys and assessments submitted in connection with this application and any design changes, or additional mitigation or compensation/enhancement measures that might subsequently be proposed.

There is no information about the proposed SUDs system will be constructed, or managed, in the Biodiversity Net Gain Assessment Report. Additionally, as the red line boundary goes up to the river banks, the watercourse part of the Biodiversity Net Gain Assessment needs to be completed, so ensure the riparian zone is adequately protected.

Advice to applicant – Environmental Permit

The applicant may require a Flood Risk Activity Permit (FRAP) to undertake the proposed works, as the main river runs adjacent to the site. As submitted, it is **unlikely that a permit would be granted**. The applicant would need to demonstrate that the proposed works will not adversely impact on flood risk or the watercourse.

In determining the flood risk activity permit for this development, we will assess its compliance with the Thames River Basin Management Plan (RBMP). We'll also consider how the development will affect water Biodiversity and the wetland environment. The River Basin Management Plan states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies.

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 the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

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.

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.

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.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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

Sarah Warriss-Simmons
Planning Advisor

Direct dial 0203 025 9855

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