

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

Our ref: WA/2025/132493/01-L01
Your ref: 251907
Date: 03 September 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 this application on 19 August 2025. We have reviewed the application in line with our planning remit, including the following documents:

- Flood Risk Assessment - Ready Power House, Molly Millar's Lane, Wokingham, Berks, RG41 2QP (ref: 6314-MILL-ICS-XX-RP-C-07.001) [April 2025]
- Site & Location Plans – Drawing Number BA 0270 50/04, Rev A [Aug 2025]
- Existing Floor Plan - Drawing Number BA 0270 50/01 [June 2025]
- Existing Elevations & Site Plans - Drawing Number BA 0270 50/02 [June 2025]
- Proposed Plans and Elevations - Drawing Number BA 0270 50/03 [June 2025]
- Planning and Design and Access Statement – Erection of an electricity transformer to the rear of Crane House [5th August 2025].

This site is located within Flood Zones 1, 2 and 3 according to the Flood Map for Planning. This is defined as areas having a low, medium and high probability of flooding respectively in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance (PPG). The site lies upon a Secondary A superficial aquifer.

Environment Agency position

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

Reason

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 submitted FRA (ref: 6314-MILL-ICS-XX-RP-C-07.001) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist.

In particular, the FRA fails to:

- take the impacts of climate change into account
 - Different climate change allowances have been used to assess future flood risk than those advised in 'Flood risk assessments: climate change allowances'
 - Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the 2080s Higher Central allowance. Consequently, the development proposes inadequate finished floor levels.

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:

- calculate an appropriate allowance for climate change using those advised in 'Flood risk assessments: climate change allowances'
- demonstrate that finished floor levels are set above the 1% AEP plus climate change flood level to reduce the risk of flooding to people and property

Climate change, Finished Floor Levels and Floodplain Compensation – advisory note

The applicant has used the 1% annual exceedance probability 20% Climate Change allowance event to assess the site which is the Central allowance for this catchment. However, as the development is classed as 'essential infrastructure' the Higher Central allowance should be used.

The applicant may extrapolate the provided P4 data to find a level for the correct climate change scenario. This value should then be used as the design flood level and overlain on a topo map.

If the applicant can submit a clearer, more legible, topo map than currently submitted within the FRA, with the correct design flood extent overlain, this would allow us to verify whether the development is within the design flood event or outside of it.

Should the development be within the design flood event, the applicant will be required to set finished floor levels accordingly and provide the necessary floodplain compensation.

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 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

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 www.gov.uk/guidance/check-if-you-need-an-environmental-permit.

This includes any proposal to undertake work in, over, under, or within 8 metres of the top of the bank of a designated Main River, called a Flood Risk Activity permit.

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

Sarah Warriss-Simmons
Planning Advisor

Direct dial 0203 025 9855

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