

Woking Borough Council
Development Control
Civic Offices Gloucester Square
Woking
Surrey
GU21 6YL

Our ref: WA/2025/132376/01-L01
Your ref: 251040
Date: 23 July 2025

Dear Sir/Madam

Full Application For Proposed Works At Willow Marina Including Installation Of PV Panels And Replacement UPVC Fenestration, Re- Cladding Of Existing Buildings And Replacement Of Wall And Roof Sheeting, Plus Resurfacing Of Existing Hardstanding And Installation Of A New Sewage Treatment Plant And A Filtration System.

Willow Marina, Val Wyatt Marina Ltd Willow Lane Wargrave Wokingham RG10 8LH

Thank you for consulting us on this application, on 8 July 2025. We have reviewed the submitted documents in line with our planning remit including:

- Flood Risk Assessment, GeoSmart Information, dated 25/04/2025.

This site is located within Flood Zones 2 and 3 according to the Flood Map for Planning. This is defined as areas having a medium and high probability of flooding respectively in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance (PPG). The proposals include installation of a new outfall to the main river.

Environment Agency position

We do not have enough information to know if the proposed development can meet our requirements for nature conservation and physical habitats because no assessment of the risks has been provided. We therefore **object** to the proposal and recommend that the planning application is refused.

The submitted planning application and associated documents indicate that an outfall discharging into the Hennerton backwater will be required as part of the proposed development. This activity will require a flood risk activity permit under the Environmental Permitting (England and Wales) Regulations 2016 which is unlikely to be

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](#)

granted for the current proposal.

Reason

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 RBMP states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies.

An ecological assessment has been submitted but doesn't reference the outfall. In fact, it states that no works will directly impact the bankside habitat or involve excavation near the watercourse. However, the 'Map of Proposed Works' shows new pipework from the sewage treatment plant to the river. No designs have been submitted showing the outfall, or photos of the outfall if it is an existing feature. It is therefore unclear exactly what the proposal is with regards to the outfall, whether it is a new or existing outfall and how much work needs to be undertaken for this element of works and how this will impact the bank.

The ecological appraisal should include an assessment of how these works will affect the existing bankside habitat, demonstrate how this risk will be controlled and 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

To overcome our objection, the developer will need to clarify exactly what works are required to discharge the sewage treatment plant's treated effluent into the Hennerton backwater. They should identify any ecological and physical habitat impacts, propose mitigation for this or compensation for loss and propose wildlife/habitat enhancement measures.

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

Informative: We are aware that the Hennerton backwater is generally very slow moving. We wonder if consideration has been given to discharging the treated effluent into the Thames instead, where flow is significantly better.

Comments relating to flood risk

An FRA has been submitted by GeoSmart Information, dated 25/04/2025. This states *'as the development proposals consist predominantly of external changes to existing structures, the raising of FFLs is only likely to be feasible for the new sewage treatment works, for which the base of the structure should be raised to 34.99 mAOD, if*

feasible.’ This level would be 600mm above the design flood (1% AEP flood plus 35% allowance for Climate Change). However, we cannot see from the elevational drawings submitted that the proposal is to set this up above the design flood (34.39m AOD). We would recommend that it is set up higher than the design flood level if possible to provide flood resilience from fluvial flooding.

We are not raising an objection on this matter on flood risk grounds. However, the LPA may want to request further information from the applicant about what level the treatment plant will be set to and whether it will be raised.

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit 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. 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.

Sewage Treatment Plant – advice to applicant

In addition to planning permission you may also require an Environmental Permit from the Environment Agency. 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 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.

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

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