

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

Our ref: WA/2025/132253/01-L01
Your ref: 250637
Date: 04 June 2025

Dear Sir/Madam

Full Application For The Proposed Creation Of A New Wildlife Pond.

Land Adjacent To Emm Brook, Wokingham

Thank you for consulting us on this application, on 20 May 2025. We have reviewed the application in line with our planning remit, including:

- Drainage Statement and Flood Risk Assessment Version 1.0 (South East Rivers Trust, undated).

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 respectively in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance (PPG).

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 (ref Drainage Statement and Flood Risk Assessment) 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. This proposal is also contrary to Policy CP1 (part 9): Sustainable development in the Wokingham Local Plan. The FRA does not therefore adequately assess the flood risks posed by the development.

In particular, the FRA fails to:

- consider whether flood risk will be increased in the surrounding area

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](#)

- demonstrate the development will not increase flood risk elsewhere

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 on any revised FRA submitted and we'll respond within 21 days of receiving it.

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
- demonstrate that any alteration to flood flows can be mitigated for to prevent an increase in flood risk elsewhere.

In principle, the Environment Agency have no concerns with the concept of the new wildlife pond, but we require further information to ensure that the risk of flooding is not increased as a result of the works. Whilst lowering ground levels can create further floodplain storage, which we support, it can unintentionally create new flow routes that can increase flood risk elsewhere. We therefore need confirmation that no new flow routes, including overland flow, will be formed as a result of the works. We would ask that a site specific topographic survey is provided, to show the difference to the site now and post the work being undertaken.

Advice to Applicant – Environmental Permit

The applicant may require a Flood Risk Activity Permit (FRAP) to undertake the proposed works as the River Loddon runs through the site. The applicant would need to demonstrate that the proposed works will not adversely impact on flood risk or the watercourse.

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 a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

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.

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.

Advice to Applicant – Pond Design

It is suggested that the drawdown zones are more undulating to create more habitat

variation. Marginal plants grow best in water 0-0.3m deep and this also creates the best habitat for amphibians. Plug plants should be native species and include a large percentage of oxygenating plants to encourage good water quality and a healthy ecosystem.

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

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