

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

Our ref: WA/2026/132883/01-L01
Your ref: 252934
Date: 02 February 2026

Dear Sir/Madam

Full Application For The Proposed Erection Of 3 No. Detached Dwellings With Associated Access, Parking And Landscaping And Creation Of A Balancing Pond.

Land At Lodge Road Hurst Wokingham RG10 0SG

Thank you for consulting us on the application noted above, on 19 January 2025. We have reviewed the following information with regard to our planning remit:

- FRA (ref: FRA.2/6244/MT, date 17th October 2025)
- P78104A - Proposed Site Layout
- P78100B - Location Plan
- Flooding sequential test and exception test (prepared by Bell Cornwell)

The application site lies within Flood Zones 2 and 3 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. There is also a main river running adjacent to the east of the site.

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.

Reasons

The submitted FRA (ref: FRA.2/6244/MT, date 17th October 2025) 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. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- consider how a range of flooding events (including extreme events) will affect people and property
- take the impacts of climate change into account

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- There is no assessment of the impact of climate change using appropriate climate change allowances. The Loddon and tributaries Management Catchment 2080s central allowance (14%) should be assessed in relation to the proposal.
- 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 from the Loddon and tributaries Management Catchment 2080s central allowance (14%). Consequently, the development proposes inadequate:
 - Flood storage compensation
 - Raised finished floor levels

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

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 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 finished floor levels are set above the 1% AEP plus climate change flood level to reduce the risk of flooding to people and property.

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.

Flood risk information

There is currently no detailed modelling available in this location. 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 scale and nature of this proposal, we would accept basic flood modelling to assess flood risk on this site in this instance. It will be necessary to determine the likely level of flooding at this site to determine appropriate finished floor levels and assess whether floodplain compensation storage is required. 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 finished floor levels and floodplain compensation storage should then be assessed 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.

Finished floor levels

Finished floor levels have not been provided. Therefore, we are not satisfied that future occupants will be safe for the lifetime of development. There would be an unacceptable risk to the health and safety of the occupants in a flood event.

Finished floor levels should be set above the 1% AEP flood level with an appropriate allowance for climate change to reduce the risk of flooding to property and future occupants. We recommend that finished floor levels are raised at least 600mm above this level in accordance with [Flood risk assessment: flood zones 1, 2, 3 and 3b - GOV.UK](#). This will reduce the risk of flooding to people and property.

Floodplain storage

As detailed above, climate change has not been assessed within the FRA. Therefore, it is unknown whether any of the proposed development is within the 1% AEP plus an appropriate allowance for climate change flood level.

Any increase in built footprint or raising of ground levels 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

The P78104A - Proposed Site Layout shows 'new 1.8m High Close Board Fencing'. 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.

Environmental permit- advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](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.

Closing comments

Please note that this response is based on the information provided at this time and if this changes in the future, we would need to consider our position again. If you have any further questions, please do not hesitate to contact me.

Yours faithfully

Miss Amy Richardson
Planning Advisor

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