

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

Our ref: WA/2025/132737/01-L01
Your ref: 252782
Date: 10 December 2025

Dear Sir/Madam

FULL APPLICATION FOR THE PROPOSED CHANGE OF USE FROM SERVICE STATION TO A FUEL OIL STORAGE AND DISTRIBUTION FACILITY INCLUDING DEMOLITION OF 2 NO. EXISTING BUILDINGS AND A GARAGE AND THE RECLADDING OF THE EXISTING BUILDING, INSTALLATION OF 8 NO. FUEL OIL STORAGE TANKS AND CONSTRUCTION OF RETAINING STRUCTURES, PLUS REFURBISHMENT OF HARDSTANDING, CAR PARKING AND OTHER ASSOCIATED WORKS. FORMER PRINCE BROS / GROVE SERVICE STATION OLD BATH ROAD CHARVIL RG10 9QJ

Thank you for consulting us on the above application on the 20th of November 2025.

Flood Risk

We have reviewed the following documents

- Flood Risk Assessment and Drainage Strategy – Grove Service Station, Old Bath Road, Charvil, Twyford, Ref 24-210 Revision A dated September 2025 by Odyssey
- Design & Access Statement Revision A [November 2025] by S&L Planning Consultants
- Plan – Topographical Survey - Ref 5104-24 Drawing no: 100 [August 25]
- Plan – Site Location Plan - Ref 5104-24 Drawing no: 90 [Jan 25]
- Plan – Existing Site Plan – Ref 5104-24 Drawing no: 50 [March 25]
- Plan – Proposed Site Plan – Ref 5104-24 Drawing no: 60 [March 25]
- Plan – Typical Retaining Wall Detail – Ref 5104-24 Drawing no SK-10 Rev A [17.11.25]

- Plan – Typical Paladin Fence Detail – Ref 5104-24 Drawing no SK-11 Rev A [17.11.25]
- Plan - Proposed Site – Elevations (Sheet 1) – Ref 5104-24 Drawing no 62 Rev A [March 25]
- Plan - Proposed Site – Elevations (Sheet 2) – Ref 5104-24 Drawing no 63 Rev A [17.11. 25]
- Plan - Existing – Building Plan (Small Garage) – Ref 5104-24 Drawing no 58 [April 25]
- Plan - Existing Building Plans (Garage - Demolition) – Ref 5104-24 Drawing no 67 [March 25]
- Plan – Proposed Site Plan (Tank Farm Layout/Volumes) – Ref 5104-24 Drawing no 75 Rev A [April 25]
- Plan – Proposed Drainage- Outfall Section/Details - Ref 5104-24 Drawing no 71 [March 25]
- Plan – Proposed Drainage Layout - Ref 5104-24 Drawing no 70 [March 25]
- Plan – Proposed Building Plans (Workshop- Mezzanine Level) - Ref 5104-24 Drawing no 66 [April 25]
- Plan – Proposed Building Plans (Workshop- Ground Level) - Ref 5104-24 Drawing no 65 [April 25]
- Plan – Proposed External Elevations (Retaining Walls) - Ref 5104-24 Drawing no 64 [March 25]
- Plan - Proposed Site – Sections – Ref 5104-24 Drawing no 61 Rev A [17.11.25]
- Plan - Existing Site – Elevations (Sheet 2) – Ref 5104-24 Drawing no 52 Rev A [17.11.25]
- Plan - Existing Site – Elevations (Sheet 1) – Ref 5104-24 Drawing no 51 Rev A [17.11.25]
- Plan – Preliminary Drainage Strategy – Ref 24-210-011 Rev A [20.09.2025]

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

The submitted FRA (ref Flood Risk Assessment and Drainage Strategy – Grove Service Station, Old Bath Road, Charvil, Twyford, Ref 24-210 Revision A dated September 2025 by Odyssey) 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 assess the impact of the retaining wall and bund in terms of impact on the flow and storage of flood water to 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 below.

- Detail of the finished floor levels of the proposed structures.
- Incorrect Climate Change Allowance used.
- Assessment of border wall in terms of fluvial flood risk
- The FRA should assess the impact of the retaining walls and bunds in terms of flood risk.
- The FRA should contain detail of the proposed outfall

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.

Informative for the Applicant – Flood Risk Activity Permit

The application refers to a proposed outfall in the “Proposed Drainage – Outfall Section/Details” as part of the site’s drainage strategy. The applicant may require a Flood Risk Activity Permit (FRAP) to undertake the proposed work. For further guidance please visit [Flood risk activities: environmental permits - 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.

Informative for the Applicant – Climate change allowance and modelling

The nearest watercourse is the River Loddon, which is modelled [Lower Loddon 2009]. The Lower Loddon [2009] modelling indicate that part of the site lies in the 5%AEP, 1%AEP, 1% plus 20% AEP and 0.1%AEP modelled outlines.

The FRA has not specifically set out what climate allowance has been applied for their assessment. The Loddon and Tributaries Catchment would need to be considered in this location, with central allowance for the appropriate epoch [Source: [Flood risk assessments: climate change allowances - GOV.UK](#)]

The FRA has not explained what design flood level [1%AEP plus appropriate allowance for climate change] has been used to inform their assessment but note that the in Table 5.1 of the FRA two in-channel nodes reference White_Brid.1 and White_Brid.2 from the Lower Loddon [2009] modelling has been provided.

The FRA has not provided a plan overlaying the modelled flood levels with their topographical survey to demonstrate that the site lies outside the design flood level, rather it states in section 5.1.5 that *“flood levels set out in Table 5.1 show the existing site levels are set above all maximum water levels except for the 0.1% AEP, whereby a narrow area to the north-west of the site would be flooded”*.

Whilst these two in-channel nodes [ref White_Brid.1 and White_Brid.2] are closest to the site, there appears to be no consideration of other in-channel nodes upstream on other nearby channels submitted in the FRA. The Lower Loddon [2009] model has floodplain data.

It is important to note our models are not designed to assess third party developments, so it should not be assumed that they are suitable for the proposed development. There

may also be new information available since the creation of the model that should be considered, such as hydrological and topographical information. It is for the applicant to check the suitability of an existing model (Lower Loddon 2009) and make any necessary updates. More information on modelling can be found here: [Using modelling for flood risk assessments - GOV.UK \(www.gov.uk\)](http://www.gov.uk).

Informative for the Applicant – Boundary Treatment

The plan “proposed site plan” shows a proposed retaining wall (with paladin fencing on top) to be located along some of the site perimeter along with a tertiary bund set behind it. The plan “Typical Retaining Wall Detail” shows the top of the wall as 36.20m AOD. The FRA mentions this retaining wall in relation to the surface water drainage strategy but there appears to have not been assessment made in terms of flood risk. It must be highlighted that walls can have a significant impact on the flow and storage of flood water, especially if they are constructed across a flood flow route. The FRA should assess the impact of the retaining walls and bunds in terms of flood risk.

Fisheries, Biodiversity and Geomorphology

We have reviewed the following documents:

- Site Location Plan
- Proposed Site Layout
- Ecological Impact Assessment, 2025
- Drainage Layout Plan
- Proposed Drainage - Outfall Section/Details

Environment Agency position

The submitted planning application and associated documents indicate that changes are proposed within 8 metres of the top of the bank of the River Loddon and the information provided does not give enough evidence to show that the proposals will not have a detrimental impact on its biodiversity and physical habitats.

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

Reason(s)

The current proposals indicate that an outfall is being proposed that will discharge into the River Loddon. An ecological assessment has been provided for this application but it does not include the outfall to the river. Therefore, the supporting documents provided fail to show that it will not have a detrimental impact on the river, its corridor and associated ecology/physical habitats.

In addition to this, when determining the flood risk activity permit for this development, we will assess its compliance with the Thames River Basin Management Plan (RBMP). We will 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.

This objection is supported by paragraphs 187 and 193 of the 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. Local Plan policy CP7 also states that development should take account of biodiversity, and where possible developments should contribute to the enhancement of the borough's biodiversity.

Overcoming our objection

It may be possible to overcome this objection if an updated ecological assessment is submitted to assess how the proposed outfall will affect the River Loddon, its species and habitats. This assessment will need to:

- demonstrate how the outfall has used the mitigation hierarchy and is designed to avoid adverse impacts
- identify any rare, declining, protected, priority or otherwise important flora, fauna or habitats
- identify the impacts of the outfall on those features
- propose wildlife/habitat enhancement measures including in-stream habitat enhancements
- propose mitigation for any adverse ecological impacts or compensation for loss
- propose timing of any onsite works to avoid impacts on protected species and fish

A detailed design of the outfall is also required. This should show the dimensions of the outfall and how it ties into the river bank to prevent instability of the banks. The design of the outfall should follow best practice guidance and the pipe should be aligned to an angle of between 30° and 60° to the direction of flow in the watercourse.

Until this is provided the risk posed by the proposed development is unacceptable. We wish to be consulted on the ecological report requested above, on any design changes, additional mitigation, compensation or enhancement measures relating to our comments that might subsequently be proposed.

Informative to the LPA

A biodiversity net gain metric has been submitted but does not include any watercourse units. As the proposal includes a new outfall discharging into the River Loddon, the watercourse element of the metric should be included and a 10% uplift is required.

Surface Water Quality

Environment Agency Position

We object to the proposed development as submitted because it involves the use of a non-mains foul drainage system in circumstances where it may be feasible for the development to be connected to a public sewer.

Reason

Inadequate justification within the 'Flood Risk Assessment and Drainage Strategy' document (pg. 15) has been provided for the use of a non-mains system. Approximately 350 metres to the West and East of the site boundary there is a foul sewer, of which

could be connected to, but this method has not been investigated. We recommend that the application should be refused on this basis.

Private sewage treatment facilities should only be used where it is not feasible for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

Overcoming the objection

To overcome our objection the applicant should thoroughly investigate the possibility of connecting to the public foul sewer, and either revise their application to propose a mains connection or submit evidence that demonstrates that this is not feasible.

Through our engagement with the LPA on their local Plan review process, we are aware that Thames Water confirmed in December 2024 that Arborfield STW has a growth scheme in AMP8 to build capacity up to 2036. Thames Water have since approached the EA for pre-application advice for Arborfield STW.

In that regard, we are of the opinion that this development can connect to the Arborfield STW due to the proposals in place to ensure there is capacity to accommodate waste water from developments within Wokingham such as this site. The Applicant should liaise with Thames Water and the LPA to discuss the opportunity to connect their development to the mains network.

When this is confirmed, a condition which prevents occupation of any of the development until the planned upgrades at the Arborfield STW are completed to ensure that there is sufficient sewerage capacity to accommodate the development should be attached to any planning consent for this development. At that time we will happy to work with the LPA/WBC to word the condition that will put forward.

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.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact the advisor identified below.

Please re-consult us if further relevant information is submitted. We will aim to provide comments within 21 days of re-consultation. If our objections are overcome, we are likely to want to suggest conditions on additional issues within our remit.

Yours faithfully

Mr Oliver Murray
Planning Advisor