

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

Our ref: WA/2025/132411/01-L01
Your ref: 251413
Date: 06 August 2025

Dear Sir/Madam

Proposed Erection Of 2no. Buildings And Open Log Store With Associated Parking, Access And Landscaping, Repositioning Of Site Boundary Fence, Plus Installation Of Acoustic Screen Following Demolition Of Existing Buildings.

Robin Lodge Nursery Part Lane Swallowfield Wokingham RG7 1TB

Thank you for consulting us on this application, on 22 July 2025. We have reviewed the submitted information in line with our planning remit, including the following documents:

- Flood Risk Assessment: Report Reference 84709R1, Final Edition, compiled by GeoSmart Information Limited, dated 19th March 2025.
- Planning Design & Access Statement: Compiled by ET Planning Limited, dated 5th June 2025.
- Location Plan: Reference No p4b/uk/674670/913740 (Undated)
- Existing Site Plan: Drawing No 979/02, Revision C, dated July 2025.
- Existing Plans Unit A & Unit B: Drawing No979/01, drawn by T Neal Limited, dated May 2021.
- Existing Volumes: Drawing No979/01, Revision A, drawn by T Neal Limited (Undated)
- Proposed Site Plan & Unit A & Log Store (Sheet 1 of 2): Drawing No 979/10, Revision C, drawn by Ex – Army Builders Limited (Undated)
- Proposed Unit B (Sheet 2 of 2): Drawing No 979/1A, Revision A, drawn by Ex – Army Builders Limited, dated May 2025.
- Proposed Volumes (Sheet 1 of 2): Drawing No 979/10, Revision D, drawn by Ex – Army Builders Limited (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 in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance (PPG). The Main River Blackwater lies to the

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](#)

east of the site. We have previously commented on similar applications and an appeal at this site.

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.

Reason

The submitted Flood Risk Assessment (FRA) Report Reference 84709R1, Final Edition, compiled by GeoSmart Information Limited, dated 19th March 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.

This proposal is contrary to paragraph 181 of the NPPF and to policy CP1 – Sustainable Development in the Wokingham Borough Adopted Core Strategy Development Plan Document, dated January 2010. The FRA does not therefore adequately assess the flood risks posed by the development.

In particular, the FRA fails to:

- demonstrate the flood modelling used within the FRA is appropriate
- consider whether flood risk will be increased in the surrounding area
- consider how people will be kept safe from the identified flood hazards
- demonstrate that finished floor levels will be set above the 1% annual exceedance probability (AEP) flood level with an appropriate allowance for climate change. Consequently, there would be an unacceptable risk to the health and safety of the occupants in a flood event.

Further information about our objection

Flood Modelling

In section 6 (Pages 43 & 44) of the FRA, titled Resilience and Mitigation, the design flood level has been assessed as 44.73m AOD. This is based on data (Model Node: 06324BL_MN_01.015) abstracted from the EA Model contained in Appendix B of the FRA.

Unfortunately, it has not been possible to verify the assessment of the design flood level or the proposed finished floor level as the EA Model referred to within the FRA has not been included within Appendix B.

Impedance of Flood Flows

- Ground Levels: In section 4 (Page 4) of the FRA, titled recommendations, it was confirmed that ground levels should be designed to channel any overland flows from off-site away from the development.

It has not been demonstrated what the intentions are in respect of the existing topography of the site and if the existing ground levels will be maintained.

Any increase to the existing ground levels will impede flood flow within the 1% annual

exceedance probability (AEP) flood extent with an appropriate allowance for climate change and will increase the risk of flooding both onsite and elsewhere.

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.

- Hardstanding: The Proposed Site Plan & Unit A & Log Store (Sheet 1 of 2): Drawing No 979/10, Revision C, illustrates a reduction in the existing hardstanding from 3,786m² to 2,793m², a difference of 993m² and replaced with soft landscaping.

It has not been demonstrated what the intentions are in respect of the existing hardstanding and the proposed increase in soft landscaping and if the existing ground levels will be maintained.

Any increase to the existing ground levels will impede flood flow within the 1% annual exceedance probability (AEP) flood extent with an appropriate allowance for climate change and will increase the risk of flooding both onsite and elsewhere.

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.

- Fencing: The Proposed Site Plan & Unit A & Log Store (Sheet 1 of 2): Drawing No 979/10, Revision C, illustrates that it is the intention to erect a continuous acoustic screen to three sides of the site boundary (Acoustic screen typically formed of 20mm lathe, overlapped or tongue and groove jointed with no gaps) The screen is to extend to the ground with no gaps, with the screen incorporating hedgehog holes.

It is acknowledged that site location and the proposed use of the site would necessitate the need of an acoustic screen.

However, what is proposed 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.

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 finished floor levels are set above the 1% AEP plus climate change flood level to reduce the risk of flooding to people and property.
- demonstrate that a safe access and egress route is not required or;

- confirm the UK Flood Hazard Rating to demonstrate that any proposed access and egress route is;
 - safe for a Design Flood Event (1% AEP Climate Change Allowance) and,
 - that future occupants will have the ability for a safe evacuation, before an extreme flood event.

Floodplain Storage

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

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.

We recommend the use of post and rail fencing, hit and miss fencing (vertical slats fixed alternately on each side of horizontal posts) or hedging.

Advice to Planning Authority - Flood Warning and Emergency Response

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The planning practice guidance (PPG) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered.

One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 173 of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal.

We agree that this indicates that as a minimum there will be:

- A danger to some people (e.g. the elderly and infirm).

This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

Advice to Applicant - Sign up for Flood Warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

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.

Sequential test - Advice to LPA

What is the sequential test and does it apply to this application?

In accordance with the National Planning Policy Framework (paragraphs 175), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test and:
 - the proposed development is consistent with the use for which the site was allocated; and
 - there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test.
 - Developments where no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future.

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

Who undertakes the sequential test?

It is for you, as the local planning authority, to determine an appropriate area of search and to decide whether the sequential test has been passed, with reference to the information you hold on land availability. You may also ask the applicant to identify any other 'reasonably available' sites which are on the open market and to check on the current status of identified sites to determine if they can be considered 'reasonably available'. Further guidance on the area of search can be found in paragraphs 027-030 of the planning practice guidance [here](#).

What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](#).

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

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