

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

Our ref: WA/2025/132441/01-L01
Your ref: 251762
Date: 12 August 2025

Dear Sir/Madam

**Full Application For The Proposed Change Of Use Of Agricultural Land For
Parking Associated With Adjacent Commercial Buildings In B2 And B8 Use.
(Retrospective)**

Newlands Farm New Bath Road Twyford RG10 9RY

Thank you for consulting us on this application, on 29 July 2025. We have reviewed the submitted documents in line with our planning remit, including:

- Site Plan (Drawing no: P19-0392_10, prepared by Pegasus Design, dated 28/03/2022)
- Block Plan (Drawing no: P19-0392_11X, prepared by Pegasus Design, dated 28/03/2022)
- Location Plan (Created by Promap, undated)
- Planning Statement (ref: P19-0392, Version 01, prepared by Pegasus Design, dated July 2025)
- Redacted application for planning permission (dated 22 July 2025).

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 Thames (Sonning to Hurley) 2019 and Loddon (lower) 2009 models place the site almost entirely within Flood Zone 3b (it is located within the 3.3% Annual Exceedance Probability (AEP) flood extent defined within Wokingham Borough Council Level 1 Strategic Flood Risk Assessment (SFRA), Final Report, dated May 2023 as the functional floodplain). The proposed development is classed as 'more vulnerable' in terms of flood risk, in accordance with National Planning Policy Framework Annex 3 - Flood Risk Vulnerability Classification.

Environment Agency position

We have two **objections** to this application relating to the development being inappropriate to the Flood Zone and due to the absence of a Flood Risk Assessment

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](#)

(FRA). We recommend that planning permission is refused on this basis.

Objection 1

We object to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the NPPF and planning practice guidance (PPG).

Reason 1

NPPF Annex 3 classifies development types according to their vulnerability to flood risk. PPG Table 2 provides guidance on which developments are incompatible with certain Flood Zones. This site lies within Flood Zone 3b functional floodplain, which is land defined by PPG as having a high probability of flooding. The proposed development is classed as 'less vulnerable' in accordance with Annex 3 of the NPPF. Table 2 of PPG makes it clear that this type of development is not compatible with this Flood Zone and therefore should not be permitted.

In accordance with section 3.2.1 of Wokingham Borough Council Level 1 Strategic Flood Risk Assessment (SFRA), Final Report, dated May 2023, 'the 3.3% AEP modelled flood extents have been used to represent Flood Zone 3b, where available from the EA'. The latest Environment Agency model for this site is the Thames (Sonning to Hurley) 2019. This model has the 3.3 AEP modelled flood extents and the site location is in this flood extent.

Overcoming our objection 1

The applicant can overcome our objection by clearly demonstrating that the proposed development site is located outside of Flood Zone 3b.

Objection 2

In the absence of a flood risk assessment (FRA), we object to this application.

Reasons

The application site lies within Flood Zone 3 which is land defined by the planning practice guidance as having a high probability of flooding. The National Planning Policy Framework (paragraph 181, footnote 63) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development flood are unknown. This is sufficient reason for refusing planning permission.

Overcoming our objection

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

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.

Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

The application refers to the existing area of hardstanding not being increased, yet the capacity of car parking is being increased from 41 No spaces to 55 No spaces, an

increase of 14 No. Further clarification on this detail would be useful.

Advisory Note - 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 do after a flood, visit <https://www.gov.uk/after-flood>.

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.

This includes any proposal to undertake work in, over, under, or within 8 metres of the top of the bank of a designated Main River, called a Flood Risk Activity 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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