

Date: 1 July 2026
Application: 261403



**WOKINGHAM
BOROUGH COUNCIL**

WBC Drainage

Development Management &
Compliance

P.O. Box 157

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Berkshire, RG40 1BN

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Dear WBC Drainage,

PN Class AA Resi storeys Consultation

Application Number: 261403

Applicant: Mr C Williams

Site Address: Atlanta, Wargrave Road, Remenham, Wokingham, RG9 3JD

Parish: Remenham

Grid Reference: Easting - 477127, Northing - 181990

Type of Development:

Proposal: Prior approval submission for the proposed enlargement of the existing dwelling through the erection of 1 no. additional storey to a maximum height of 6.2 metres.

Case Officer: Kieran Neumann

Development Management has received the above application, and we require your comments on the proposal using the recommended memorandum below. The documents associated with this are available to view in NEC DM using the application number 261403. Alternatively, public documents are available to view on the Council's planning application search page: [Wokingham Borough Council Online Planning](#).

Please index your response into NEC DM against the application. If you are recommending conditions, you should give a reason with reference to relevant policies. A list of standard conditions can be requested from the case officer.

Your observations are required in respect of this application by **15 July 2026**.

Yours sincerely,
Development Management & Compliance

MEMORANDUM

From:	NT		
Service	WBC Drainage	App No:	261403
Address:	Atlanta, Wargrave Road, Remenham, Wokingham, RG9 3JD.		
Proposal:	Prior approval submission for the proposed enlargement of the existing dwelling through the erection of 1 no. additional storey to a maximum height of 6.2 metres.		
Type of Development:			
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☒ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

LLFA received Prior approval submission for the proposed enlargement of the existing dwelling through the erection of 1 no. additional storey to a maximum height of 6.2 metres on 1st July 2026.

As the Site falls within Flood Zone 3 (main river Thames), the Environment Agency is the primary consultee and approval body in respect of fluvial flood risk, and their view on the flood zone classification (including any 3a/3b distinction), the Sequential/Exception Test evidence, and the acceptability of proposed finished floor levels should be treated as the decisive technical input for the LPA's determination.

The LLFA's role in this case is **advisory only**, properly limited to matters within our statutory remit under the Flood and Water Management Act 2010 namely surface water/overland flow, ordinary watercourses, and groundwater, insofar as these interact with the proposed development. It is recommended EA should be consulted, and that their response is treated as the lead technical position on the fluvial matters .

Application type note: As this is a prior approval submission (GPDO Part 1, Class AA upward extension of an existing dwellinghouse), flooding is a specified prior approval matter, but the assessment mechanism differs from a full planning application under NPPF paras 170–182. The FRA has been prepared as if for a full application (referencing the Sequential/Exception Test) this is helpful as supporting evidence, but the correct statutory test here is whether the LPA (informed

by the EA) is satisfied the enlarged building is safe from flooding, not a formal Sequential/Exception Test determination in the Town and Country Planning sense.

Overall position: No comments in principle from an LLFA perspective, subject to the points below being resolved and to the Environment Agency's view on flood zone compliance. The FRA's underlying methodology (raising all habitable/sleeping accommodation to first floor, retaining the unchanged footprint, flood resilient construction to ground floor) is a sound and commonly accepted approach for existing dwelling extensions in Flood Zone 3. However, the FRA as submitted contains errors and gaps that should be resolved, several of which are matters for the EA to confirm rather than the LLFA.

Matters for the Environment Agency to confirm (fluvial flood risk):

1. **Climate change allowance error in labelling.** Section 5.3 states the "Central" allowance (43%) has been applied for the 2080s epoch. Per the DEFRA table reproduced in Figure 4, the 2080s **Central** allowance is 31%; 43% is the **Higher Central** allowance. The applicant should either confirm they are deliberately applying the more precautionary Higher Central allowance or recalculate using 31% if Central is genuinely intended this affects the design flood level and required freeboard.
2. **Internal inconsistency – 43% vs 46% CC.** Section 8.3.1, 8.3.5 and the Conclusion refer to 1% AEP + 46% CC = 33.78m AOD, but the calculation in Section 5.3 clearly derives 33.78m AOD from the 43% figure. A drafting error but needs correcting for consistency.
3. **Copy-paste error.** Section 8.3, second paragraph, refers to the design of the sports centre building carried over from another project and not amended.
4. **Flood Zone 3a/3b (functional floodplain) not established.** The report identifies the Site as Flood Zone 3 throughout but never distinguishes 3a from 3b. This is material because Table 2 of the NPPG shows More Vulnerable development is not permitted in Zone 3b regardless of the Exception Test outcome.

LLFA-level observations (Exception Test only one limb addressed. NPPF para 178 requires demonstration of (a) wider sustainability benefits outweighing flood risk, and (b) that development will be safe without increasing risk elsewhere. The FRA only addresses (b). For a householder extension the first limb is usually applied lightly but should be explicitly stated.

5. **Safe access/egress not evidenced.** The FRA lists safe egress as a design principle but doesn't test it against the mapped flood extent. Wargrave Road itself lies within Flood

Zone 3, so the dwelling could become isolated in a flood. Confirmation of a safe egress route or an agreed shelter-in-place strategy would be helpful, particularly given the Water Entry Strategy already accepts water ingress up to 1.35m at ground floor.

6. **Freeboard basis.** 600mm freeboard above the 1% AEP + CC level is used rather than the more commonly applied 300mm minimum welcomed as precautionary, though worth the applicant confirming this is deliberate (in any case comfortably achieved, at 1.15m clearance).

Conditions & Reasons (if required)			
Date:	10/07/2026	Signed:	NT