

Date: 2 March 2026
Application: 260257



**WOKINGHAM
BOROUGH COUNCIL**

WBC Drainage

Development Management &
Compliance

P.O. Box 157

Shute End, Wokingham

Berkshire, RG40 1BN

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Dear WBC Drainage,

Householder Consultation

Application Number: 260257

Applicant: The Owner and/or Occupier

Site Address: 92 Old Bath Road, Charvil, Wokingham, RG10 9QL

Parish: Charvil

Grid Reference: Easting - 477757, Northing - 175992

Type of Development: Other Householder

Proposal: Householder application for the proposed erection of first floor front extension and installation of a front dormer, plus erection of a part single part two storey rear extension, conversion of the garage to habitable accommodation and changes to fenestration.

Case Officer: Annabelle Jones

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 260257. 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 **23 March 2026**.

Yours sincerely,
Development Management & Compliance

MEMORANDUM

From:	NT		
Service	WBC Drainage	App No:	260257
Address:	92 Old Bath Road, Charvil, Wokingham, RG10 9QL.		
Proposal:	Householder application for the proposed erection of first floor front extension and installation of a front dormer, plus erection of a part single part two storey rear extension, conversion of the garage to habitable accommodation and changes to fenestration.		
Type of Development:	Other Householder		
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 Householder application for the proposed erection of first floor front extension and installation of a front dormer, plus erection of a part single part two storey rear extension, conversion of the garage to habitable accommodation and changes to fenestration 2nd march 2026. LLFA has reviewed the submitted FRA (Ref: LE2026080FRA, Liska Environmental, January 2026) and has the following observations for the LPA's consideration.

Exception Test

The most significant concern with this FRA is the treatment of the Exception Test. The document dismisses both the Sequential and Exception Tests on the basis that the proposal constitutes Minor Development. This is not accepted. The application includes a garage conversion to habitable accommodation and a part two storey rear extension, both of which increase the quantum of More Vulnerable floorspace in Flood Zone 3 and increase the number of people at risk from flooding. These elements go beyond what the PPG defines as Minor Development for the purposes of Sequential and Exception Test exemption. For More Vulnerable development in Flood Zone 3a, the Exception Test must be properly addressed demonstrating both that the development provides wider sustainability benefits that outweigh flood risk, and that it will be safe for its lifetime without increasing flood risk elsewhere.

Climate Change and Finished Floor Levels

For a residential development in Flood Zone 3, the NPPF and PPG require flood risk to be assessed over the lifetime of the development using the EA's current climate change allowances. For the

Thames catchment, the relevant uplift for the 2080s Higher Central scenario is 25.6% on peak river flow. The FRA must assess the 1 in 100 year plus climate change flood level at the site and demonstrate that the proposed FFL's and safe access arrangements remain appropriate under those conditions.

Section 5.3 states that finished floor levels in the extension will match existing floor levels. In Flood Zone 3 this is not acceptable without supporting evidence. The FRA does not state what the existing floor level is, does not provide the design flood level at this location, and does not demonstrate that the proposed levels are at or above the 1 in 100 year plus climate change flood level. The EA should be asked to confirm whether modelled flood levels are available for this location, and the FRA should be revised to demonstrate compliance against those levels.

Safe Access and Egress

The safe access and egress section nominates a westward evacuation route along Old Bath Road but provides no flood depth, velocity or hazard data for that route. A nominated route is not the same as a demonstrated safe route. The PPG requires evidence that the access route remains passable at the design flood condition — this has not been provided.

LLFA Position and Surface Water Drainage

On the matters within the LLFA's own remit, the drainage strategy is not adequate. The proposal to use a water butt and soakaway is not supported by any runoff calculation, any demonstration that the soakaway is viable at this location, or any assessment of pre- and post-development impermeable areas. It should also be noted that soakaways are generally not appropriate in Flood Zone 3 where groundwater or fluvial inundation may render them inoperable or cause surcharging. The LLFA would require a proper drainage strategy with supporting calculations before being in a position to raise no objection on surface water grounds.

The LLFA raises a holding objection on surface water drainage grounds pending receipt of a revised drainage strategy with supporting calculations. On all flood risk matters relating to Flood Zone 3, the LPA is directed to seek the EA's formal response, as the EA is the appropriate approving authority for those aspects of the application. It is important to clarify jurisdiction. The site is confirmed as lying within Flood Zone 3 as defined by the EA. Flood Zone 3 matters including the adequacy of the FRA, the application of the Exception Test, and the acceptability of development in terms of fluvial flood risk fall within the statutory remit of the EA, not the LLFA. The LLFA's role on this application is advisory only, limited to surface water drainage and ordinary watercourse matters. The LPA should seek the EA's view as the primary authority on flood risk before determining this application.

Conditions & Reasons (if required)

Date:	06/03/2026	Signed:	NT
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