

Date: 22 July 2025
Application: 251413



**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,

Full Planning Approval Consultation

Application Number: 251413

Applicant: Ex- Army Builders

Site Address: Robin Lodge Nursery, Part Lane, Swallowfield, Wokingham, RG7 1TB

Parish: Swallowfield

Grid Reference: Easting - 472749, Northing - 164574

Type of Development: Major All other developments

Proposal: 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.

Case Officer: Connie Davis

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 251413. 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 found on the Z Drive at: [Z:\Standard Planning Conditions](#).

Your observations are required in respect of this application within **10 working days** of the above date or **15 working days** if the development type is classed as a major development.

Yours sincerely,
Development Management & Compliance

MEMORANDUM

From:	NT		
Service	WBC Drainage	App No:	251413
Address:	Robin Lodge Nursery, Part Lane, Swallowfield, Wokingham, RG7 1TB.		
Proposal:	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.		
Type of Development:	Major All other developments		
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 already commented on this application on 16th July 2025 and our comments remains the same .

Analysis of WBC Drainage Comments

The memorandum from Boniface Ngu (dated 16/07/2025) raises several concerns about the FRA, which are analyzed below in the context of the FRA and relevant planning policies, including the National Planning Policy Framework (NPPF) 2024 and National Planning Practice Guidance (NPPG).

1. Flood Zone Classification (Flood Zone 3a vs. 3b)

Comment: The memorandum questions the FRA's classification of the site as being within Flood Zone 3a, given site levels ranging from 43.38 mAOD to 45.11 mAOD and a 5% Annual Exceedance Probability (AEP) flood level of 43.94 mAOD, increasing to 44.73 mAOD with a 25% climate change allowance. It requests a flood outline map indicating Flood Zones 3a and 3b relative to the proposed development.

The FRA's failure to provide a clear delineation of Flood Zones 3a and 3b is a valid concern. A flood outline map, supported by hydraulic modeling or EA data, is necessary to clarify the site's flood zone classification.

2. Adequacy of the FRA

Comment: The memorandum states that the FRA, being a desk-based study, provides recommendations rather than demonstrating that the development will not have adverse flood effects on or off-site. It deems the FRA unfit for purpose.

Analysis:

- The FRA identifies multiple flood risks, including fluvial (high probability, Flood Zone 3), surface water (up to 0.9 m depth in a 1% AEP event, Page 28), and groundwater (moderate risk, Page 30). It also proposes mitigation measures (Pages 43–45), such as raising finished floor levels (FFL) to 45.03 mAOD (0.3 m above the 1 in 100 year + 25% climate change flood level of 44.73 mAOD), flood-resilient design, non-return valves, and emergency evacuation plans. However, the FRA lacks quantitative analysis to support these recommendations. For example:
 - **Surface Water Runoff and Hydraulic impact** The FRA recommends calculating surface water runoff and providing attenuation for the 1 in 100 year event with climate change allowance (Page 5) but does not include a drainage strategy or calculations to demonstrate compliance with NPPF and (SuDS) requirements. Also, FRA notes the acoustic screen should not obstruct flood flows (Page 3) but provides no hydraulic modelling to confirm this, which is critical given the site's proximity to drainage ditches and the River Blackwater (Page 14).
 - **Structural Integrity:** The FRA suggests consulting a structural engineer (Page 44) but does not assess the impact of flood flows on the proposed buildings, which is essential for ensuring safety in Flood Zone 3. The FRA is insufficiently detailed to meet NPPF requirements for a site-specific FRA. It lacks hydraulic modelling, a detailed drainage strategy, and evidence that proposed mitigation measures will effectively manage flood risk.

3. Vulnerability Classification

Comment: The memorandum notes that greenhouses (existing) and offices/canteens (proposed) are classified as “less vulnerable” per NPPF Annex 3, but mobile homes are “highly vulnerable” and not permissible in Flood Zones 3a or 3b per PPG Table 2.

FRA does not explicitly address the Sequential Test or Exception Test (Page 39), which are required for “less vulnerable” development in Flood Zone 3a. The Sequential Test ensures no lower-risk sites are available, and the Exception Test requires demonstrating wider sustainability benefits and safety for the development’s lifetime. The FRA’s lack of engagement with these tests is a critical gap. The proposed development’s “less vulnerable” classification is appropriate, but the FRA fails to demonstrate compliance with the Sequential and Exception Tests, which is necessary for approval in Flood Zone 3.

4 Surface Water Management and Hardstanding

Comment: The memorandum notes a reduction in hardstanding area (26%) in the revised proposal drawing (979/10 C, dated 17/03,). The reduction in hardstanding is beneficial, but the FRA’s lack of a detailed SuDS strategy or runoff calculations is a significant deficiency. Also, FRA identifies a **safe evacuation route** to Flood Zone 1 along Part Lane (875 m south, Page 48) and recommends signing up for EA Flood Alerts/Warnings (Page 47). However, it does not provide a detailed flood evacuation plan, which is critical given the high fluvial and surface water flood risks.

Conditions & Reasons (if required)

Date:	28/07/2025	Signed:	NT
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