

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

Our ref: WA/2025/132163/01-L01
Your ref: 250839
Date: 23 April 2025

Dear Sir/Madam

Full Application For Subterranean Ground Strengthening Works Adjacent To The Access Track And Installation Of Permeable Hardstanding And Temporary Structures To Facilitate The Change Of Use Of The Area East Of The Existing Building To Temporary Storage In Connection With Estate-Wide Activities. (Retrospective)

Woodlands House, The Burrow Site Wargrave Road Remenham Wokingham RG9 2LT

Thank you for consulting us on this application, on 10 April 2025. We have reviewed the submitted documents in line with our planning remit, including the following:

- Flood Risk Assessment (dated March 2025 and prepared by Innervision Design).

The application site lies within Flood Zones 2 and 3 defined by the National Planning Policy Framework (NPPF) and associated Flood risk and coastal change Planning Policy Guidance (PPG) as having a medium and high probability of flooding. In addition, the application site lies within the 3.3% annual exceedance probability (AEP) flood outline which is identified by the PPG as within Flood Zone 3b (the functional floodplain). The application site is also within the 1% AEP plus an appropriate allowance for climate change flood extent (the design flood extent) in accordance with the Thames (Sonning to Hurley) 2019 model.

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.

Reasons

The submitted FRA (dated March 2025 and prepared by Innervision Design) 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. The FRA does not therefore adequately assess the flood risks posed by the development.

In particular, the FRA fails to:

- use the most up to date available information to assess flood risk
- take the impacts of climate change into account
- demonstrate the development will not increase flood risk elsewhere
- demonstrate the development will be appropriately flood resistant and resilient for its lifetime.

The application site lies within Flood Zones 2 and 3 defined by the National Planning Policy Framework (NPPF) and associated Flood risk and coastal change Planning Policy Guidance (PPG) as having a medium and high probability of flooding. In addition, the application site lies within the 3.3% annual exceedance probability (AEP) flood outline which is identified by the PPG as within Flood Zone 3b (the functional floodplain).

The application site is also within the 1% AEP plus an appropriate allowance for climate change flood extent (the design flood extent) in accordance with the Thames (Sonning to Hurley) 2019 model. The submitted FRA does not refer to this model or assess the impacts of climate change on the development. The lifetime of the development is not clear, therefore the design flood extent which considers the impacts of climate change is not known at this stage.

We welcome that the FRA states there has been no land level raising as a result of the proposed development. Please note, however, this has not been evidenced. We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

However, the log stores (the built structures) and the storage of logs and other materials in this location may result in a loss of floodplain storage within the design flood extent. This has not been assessed in the FRA. No compensation for the loss of floodplain storage has been provided and so the development may lead to an increase in flood risk elsewhere.

In addition, the materials stored on site may be within the design flood extent and therefore be at risk of flooding. This is also not assessed in the FRA, and so it is not known if flood resistance or resilience measures are required in order to protect the applicant's property from flooding.

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.

Specifically the FRA will need to:

- calculate an appropriate allowance for climate change using those advised in ['Flood risk assessments: climate change allowances'](#)

- demonstrate that any loss of floodplain storage within the 1% AEP plus an appropriate allowance for climate change can be directly compensated for to prevent an increase in flood risk elsewhere
- demonstrate that the development will be appropriately flood resistant and resilient for its lifetime to reduce the risk of flooding to property

Flood risk information

Please contact our Customers and Engagement Team to obtain relevant flooding information for this site. This information is provided in the form of flood map products. The product supplied depends on the type and size of the development being undertaken. Please contact them to request flood level and modelled extent information for the site. Your request can be sent by email to enquiries_THM@environment-agency.gov.uk.

When requesting modelled flood levels and modelled flood extents please provide them with the full site address, site plan, and explain that you require the information for a FRA for a development.

Information from our flood model should be used to inform an FRA. The impacts to and from the development over a range of flood events should be assessed, including the 3.3% annual exceedance probability (AEP) and the 1% AEP plus an appropriate allowance for climate change flood event.

Climate change

Please be aware that in July 2021 the climate change allowances for peak river flow were revised giving a range of allowances to be used based on flood zone, vulnerability and management catchment area. Further information can be found here: ['Flood risk assessments: climate change allowances'](#).

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. We welcome that hedging was chosen for this retrospective development.

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.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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

Direct dial 0203 025 9855
Direct e-mail Planning_THM@environment-agency.gov.uk