

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

Our ref: WA/2025/131993/01-L01
Your ref: 243125
Date: 20 March 2025

Dear Sir/Madam

Part Demolition Of Existing Building And Replacement With A Three-Storey Extension To Provide Extra-Care Units (Use Class C2), With Associated Soft And Hard Landscaping Works; Provision Of Additional Vehicle Parking, Bin Stores And Ancillary Structures; And Alterations To Existing Basement

Thamesfield Retirement Village Remenham RG9 2LX

Thank you for consulting us on this application on 21 January 2025. Thank you for allowing us an extension of time in which to provide this response.

We have reviewed the documents in line with our planning remit, including:

- Flood Risk Assessment Addendum (November 2024) by Jeremy Benn Associates Limited (ref HJX-JBAU-XX-ZZ-RP-HM-0001-A01-C02-FRA_Addendum)
- Design & Access Statement (November 2024) by Design Engine Architects (Ref 2212-R-014 V2)
- Planning Statement (06 December 2024) by Stantec (ref A5 P1a)
- Letter dated 6 December 2024 by Stantec (ref 333101644/A3/CAD) labelled as Covering Letter on LPA website
- Landscape Strategy (November 2024) by Turley Design
- Car Park – Hard and Soft Landscape Plan (November 2023) by Turley Design
- Courtyard & Patio Hard Landscape Plan (November 2023) by Turley Design
- Existing Site Plan (Ref 2212-P-002 Rev 00) dated 08/12/2023 by Design Engine Architects
- Proposed Site Plan (Ref 2212-P-100 Rev 00) dated 08/12/2023 by Design Engine Architects
- Existing Plans – Basement Floor (Ref 2212-P-010 Rev 00) dated 08/12/2023 by Design Engine Architects

- Proposed North Elevations (Ref 2212-P-352 Rev 02) dated 08/12/2023 by Design Engine Architects
- Proposed East and West Elevations (Ref 2212-P-351 Rev 02) dated 08/12/2023 by Design Engine Architects
- Proposed South Elevations (Ref 2212-P-350 Rev 02) dated 08/12/2023 by Design Engine Architects
- Proposed Plans – Ground Floor (Ref 2212-P-201 Rev 00) dated 08/12/2023 by Design Engine Architects
- Existing North Elevation (Ref 2212-P-032 Rev 00) dated 08/12/2023 by Design Engine Architects
- Existing East and West Elevations (Ref 2212-P-031 Rev 00) dated 08/12/2023 by Design Engine Architects
- Existing South Elevation (Ref 2212-P-030 Rev 00) dated 08/12/2023 by Design Engine Architects
- Existing Plans – Ground Floor (Ref 2212-P-011 Rev 00) dated 08/12/2023 by Design Engine Architects

This site is located within Flood Zones 2 and 3 according to the Flood Map for Planning. This is defined as areas having a medium and high probability of flooding respectively in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance (PPG).

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 (Flood Risk Assessment Addendum (November 2024) by Jeremy Benn Associates Limited (ref HJX-JBAU-XX-ZZ-RP-HM-0001-A01-C02-FRA_Addendum)) 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:

- demonstrate the development will not increase flood risk elsewhere
- demonstrate that finished floor levels will be set above the 1% annual exceedance probability (AEP) flood level with an appropriate allowance for climate change. Consequently, there would be an unacceptable risk to the health and safety of the occupants in a flood event.

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 objective. Please re-consult us on any revised FRA submitted.

Specifically, the FRA will need to:

- 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 finished floor levels are set above the 1% AEP plus climate change flood level to reduce the risk of flooding to people and property.

Please refer to comments below.

Further information regarding our objection

We understand from the planning description is that this is an application for the *“proposed part demolition of existing building and replacement with a three-storey extension to provide extra-care units, with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement”*. However, upon reviewing the submitted documents it is not clear what is being applied for, as the description of the works varies between some of the documents. In the letter (6 December 2024) it states the demolition of Block C and a link corridor to Block D and extension to Block B whilst the FRA addendum (November 2024) states replace existing Block C and part of Block D. The FRA addendum makes no reference to Block B but refers to works at Block A. In the D&A Statement (November 2024) refers to additional works which are labelled as “interim works” which are also indicated as completed.

Furthermore, the D&A Statement states that there are currently 37 care units on the site and there will be a net increase of 13 units totally 50, however in the FRA addendum states, *“Following the planning application there will be 49 extra-care units on the site (net gain of 14 extra care units)”*.

The applicant should confirm all the elements that are to be considered in this planning application and that the submitted documents reflect these.

The 2019 Thames Mapledurham to Hurley 1D-2D hydraulic model was obtained and then re-run using the latest version of Flood Modeller – TUFLOW with site-specific topographical survey which was then used in the FRA addendum. The baseline modelling indicates that the site is affected by the 1 in 30, 1 in 100, 1 in 100 plus 31%CC and 1 in 1000.

In section 3.2 of the FRA addendum it mentions that the peak water levels on the site vary from 33.24 and 33.29mAOD. In figure 3.2, the flood levels are represented as bands with a few flood levels having been provided. We note there are no flood levels provided for the area where Block C and D are located (the boundary between the site and Remenham Row).

We note that the FRA addendum does not confirm what the design flood level is, simply referring to it as *‘100-year plus 31% allowance for climate change’*. We need to understand the design flood level. As no specific design flood level is quoted, it is unclear whether the level for proposed FFL quoted in section 5.1 of 33.86mAOD is sufficient or not. The applicant should provide more flood levels across the site on a plan to demonstrate the appropriate design flood level.

We understand from the proposed building footprint will be steered away from the edge of the 100-year with climate change flood extent. Many of the figures (Figures 3.1, 3.2, 3.3, 3.4, 3.5) presented in the FRA addendum reflect the development as it is (baseline), not the proposed layout. Only Figure 5.1 shows proposed, and existing buildings overlain with 1 in 100 plus 31%CC modelled extent, but this plan is not very clear. We do note that the FRA addendum states that floodplain compensation is not required, however there is uncertainty whether there is an increase in built footprint from the information submitted.

Therefore, to demonstrate that that there is no increase in built footprint within the 1 in

100 plus appropriate allowance for climate change, the applicant should provide a plan showing the proposed new built footprint overlain with this modelled scenario. In addition, the applicant should also confirm the existing and proposed built footprints that are being demolished and erected based on what is being applied for. If there is any increase in built footprint within the 1 in 100 plus appropriate allowance for climate change, then the applicant will be required to provide floodplain compensation. Level for level floodplain compensation is the preferred method of mitigation and should be considered within the FRA if this assessment shows there is a net loss of floodplain storage.

In the D&A statement a new terraced garden will be located on the footprint of the old extension. From reviewing the Courtyard & Patio Hard Landscape Plan, it would suggest that the terraced garden will be raised as stairs are shown. Please can the applicant confirm what level the terraced garden be set to? Has an assessment regarding floodplain storage/flood flows within the 1 in 100 plus appropriate allowance for climate change been undertaken?

It should also be clarified whether there are any associated land raising proposed along the gravel pathway or courtyard area. If there is any raising of ground levels within the 1 in 100 plus appropriate allowance for climate change, then the applicant will be required to provide floodplain compensation.

For the car park extension, we understand from the On the Car Park – Hard and Soft Landscape Plan that the proposal is to *“retain existing tarmac paving. Parking bay lines to be painted”* to create the additional parking totally 39 spaces. Therefore, we understand that there will be no change in ground levels as a result. However, we note that on the same plan there is a retaining wall being proposed, where it states *“height min. 50cm above floor level of car park”* but does not state on plan what this height will be set to. Has there been an assessment on flood risk in relation to the retaining wall as it lies within the 1 in 100 plus appropriate allowance for climate change?

We note that the FRA addendum highlights that the site is at risk of groundwater flooding and that there have been instances of flooding historically. The document goes on to provide recommendations for the basement and the Planning Statement (06 December 2024) states there will be *“minor alterations...with plant being incorporated into this space”*. What do these ‘alterations’ consist of? We do note that in the FRA addendum that it states the basement will be used exclusively as non-habitable floor space and for storage only.

Finally, in section 5.1 of the FRA addendum, it proposes mitigation measures for the existing buildings, by increasing floor levels (where possible) and further in section 5.5, a groundwater monitoring borehole is referenced. To clarify, are these mitigation measures being considered as part of this application as not mentioned in other planning documents?

Advice to LPA – Flood Hazard

The FRA addendum has undertaken an assessment of flood hazard in regard to the site as it is (baseline), showing in figure 3.4 that the hazard varies on the site during a 1 in 100 plus appropriate allowance for climate change with the access off site shown to be significant – danger for some. A Flood Warning and Evacuation Plan has been produced, but there is uncertainty if this will be updated to reflect current proposal.

However, we do not normally comment on or approve the adequacy of flood emergency

response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals. It is for the LPA to assess and determine if this is acceptable.

INFORMATIVE – The Environment Agency is in the process of publishing new national flood and coastal erosion risk datasets. Some datasets have already been published with additional flood risk datasets, including updated Flood Zones and new climate change scenarios, due to be published on Flood Map for Planning on 25 March 2025. In due course we expect to make further datasets available, including flood depth information for rivers, sea and surface water.

More information about our new data can be found in this [Defra Data Services Platform announcement](#). Our planning advice will continue to be based on the best information available at the time. Further information is available on the Town and Country Planning Association website – [New national flood and coastal erosion risk information](#).

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.

Yours faithfully

Sarah Warriss-Simmons
Planning Advisor

Direct dial 0203 025 9855

Direct e-mail Planning_THM@environment-agency.gov.uk