

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

Our ref: WA/2025/131993/03-L01
Your ref: 243125
Date: 13 October 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 the above application on 23/09/2025. We have reviewed the following documents within the application in line with our planning remit:

- Flood Risk Assessment Addendum [Revision A1-C07 dated September 2025] by JBA Consulting Ltd [Ref HJX-JBAU-XX-ZZ-RP-HM-0001-A01-C07-FRA_Addendum]
- Letter dated 17/09/2025 by Stantec [Ref 3331001644/A3/LD]
- Site Location Plan - Ref 2212-P-001 Rev 01 [12/09/2025]
- Proposed Site Plan - Ref 2212-P-100 Rev 02 [Dated 12/09/25]
- Car Park - Hard and Soft Landscape Plan – Ref RETH3002 Drawing No. 06 Rev D [September 2025]
- Courtyard & Patio Soft Landscape Plan – Ref RETH3002 Drawing No. 04 Rev B [September 2025]
- Illustrative Masterplan – Courtyard and Patio – Ref RETH3002 Drawing No. 03 Rev C [September 2025]
- Courtyard & Patio Hard Landscape Patio – Ref RETH3002 Drawing No. 05 Rev B [September 2025]
- Proposed North Elevations - Ref 2212-P-352 Rev 03 [12/09/2025]

- Proposed East & West Elevations - Ref 2212-P-351 Rev 03 [12/09/2025]
- Proposed South Elevations - Ref 2212-P-350 Rev 03 [12/09/2025]
- Proposed Site Section BB - Ref 2212-P-301 Rev 02 [12/09/2025]
- Proposed Site Section AA - Ref 2212-P-300 Rev 02 [12/09/2025]
- Proposed Plans – Ground Floor - Ref 2212-P-201 Rev 02 [12/09/2025]
- Proposed Plans – Basement Floor - Ref 2212-P-200 Rev 01 [12/09/2025]

Environment Agency position

We remove our previous objection (reference WA/2025/131993/02, dated 30 April 2025). The proposed development will only meet the National Planning Policy Frameworks (NPPF) requirements in relation to flood risk if the following **planning condition** is included within the decision notice.

Condition – Flood risk

The development shall be carried out in accordance with the FRA detailed above and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 33.86 metres above Ordnance Datum (AOD)
- There shall be no raising of existing ground levels on the site within the 1% Annual Exceedance Probability (AEP) design flood event, including a 31% climate change (CC) allowance. If land raising is proposed within 1% AEP plus 31% CC extent, then level for level floodplain compensation must be provided.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason(s)

This condition seeks to reduce the risk of flooding to the proposed development and future occupants and prevent an increase in flood risk elsewhere, ensuring that the flow of flood water is not impeded, and the proposed development does not cause a loss of floodplain storage - In line with paragraphs 178 and 181 of the NPPF.

Caveat

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.

We have reviewed section 5.7 of the FRA which details if any ground level changes are proposed as part of the landscape strategy. To our understanding any land raising to

take place is outside of the 1% AEP + CC design flood extent, however please contact us if this is not the case.

There are minor inconsistencies regarding the proposed FFLs of the development. Section 1.4 of the FRA (alongside both proposed section plans detailed above) state the FFL will be set at 33.87 mAOD. However elsewhere throughout the FRA the FFLs are suggested to be set at 33.86 mAOD. Given 33.86 mAOD provides a 600mm clearance above the design flood level we are assuming this is what is being proposed. However please clarify if this is not the case.

Advice to the Local Authority – Flood warning and emergency response

Section 3.4 of the FRA has considered safe access and escape routes. Figure 3.3 shows that the hazard varies across the site and along the access route, ranging up to 'danger for all'. Figure 3.3 of the FRA has provided the flood depths for a 1% AEP plus an appropriate allowance for climate change (31%). In section 3.3 it states flood *"depths at the site access to the north of the site are most commonly between 0.60 – 0.80m"*. Furthermore, it concludes that *"flood depths at Block D (See building location in Appendix C) typically range from 0.40 – 0.50m, although this is much lower for Block E"*.

In accordance with paragraph 181 of the NPPF, you must ensure that the residual flood risk is safely managed and that safe access and escape routes are included. This is on the understanding that you have concluded that the proposed development has passed the flood risk sequential test. Within the application documents the applicant should clearly demonstrate to you that a satisfactory route of safe access and egress is achievable. It is for you to assess and determine if this is acceptable.

In Appendix B of the FRA a flood warning and evacuation plan has been submitted. 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.

The planning practice guidance (PPG) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development. Please note in section 5.4 of the FRA it refers to safe refuge where it states *"In the case of residents are not able to be evacuated, they will have to stay in their rooms if located in upper floor levels (or otherwise in the upper floor levels), for example in Block A, B and E"*

Advice to applicant - Environmental permit - Flood risk activities

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- Erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge

- Altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- Building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- Dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- Diverting or impounding the flow of water or changing the level of water in a main river
- Quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- Any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- Any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- Any activity within 16 metres of a sea defence structure
- Activities carried out on the floodplain of a main river, more than 8 metres from the riverbank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural haystacks, straw stacks or manure clamps in these places)

For further guidance please visit Flood risk activities: environmental permits - GOV.UK or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk

Closing 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. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me. Please quote our reference number in any future correspondence.

Yours faithfully,

Mr Nathan Davis
Planning Advisor

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