

Reading Borough Council
Development Control
PO Box 17
Reading
Berkshire
RG1 7TD

Our ref: WA/2024/131717/01-L01
Your ref: PL/24/1151
Date: 03 October 2024

Dear Sir/Madam

**Change Of Use From Commercial, Business And Service (Use Class E), To Mixed A Use Of Class E And Two Flats Above (Use Class C3). Prior Approval Under Class G, Part 3 Of Schedule 2 Of The Town And Country Planning (General Permitted Development) Order 2015 (As Amended)
18 Bridge Street, Caversham, Reading, RG4 8AA**

Thank you for consulting us on the proposed development noted above, on 11th September 2024. We apologise for the delay in sending you our response.

We have reviewed the information submitted with the application in line with our planning remit.

According to the Flood Map for Planning the site lies within Flood zones 2 and 3 which is land 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 respectively.

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 (Planning Statement [also covering flood risk and noise] prepared by ET planning LTD) 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 PPG and its site-specific flood risk assessment checklist. This proposal is also contrary to policy EN18: Flooding and Sustainable Drainage Systems in the Reading Brough Local Plan. 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

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- take the impacts of climate change into account
- consider how a range of flooding events (including extreme events) will affect people and property
- 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 objection. Please re-consult us on any revised FRA submitted.

Specifically the FRA will need to:

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

Flood risk information

The site, 18 Bridge Street, is affected by the Thames (Pangbourne to Sonning) 2019 model.

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 an FRA for a development.

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

Climate change

There is no assessment of the impact of climate change using appropriate climate change allowances. Without an assessment on the impacts of climate change on flood risk, the risk to people and property in this location over the lifetime of the development is not known.

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'](#).

Finished floor levels

Finished floor levels have not been set above the 1% annual exceedance probability (AEP) plus an appropriate allowance for climate change flood level. Therefore, we are not satisfied future occupants will be safe for the lifetime of the development. There would be an unacceptable risk to the health and safety of the occupants in a flood event.

We appreciate that the 'Planning Use Class' for the ground floor is not changing, however in accordance with the National planning Policy Framework Annex 3: Flood risk vulnerability classification, the ground floor is moving from a less vulnerable development (office space) to a more vulnerable development (dental clinic). This intensification of vulnerability classification should be assessed. Therefore, the finished floor level of the ground floor should be provided in the FRA to assess whether future occupants will be safe for the lifetime of the development.

Finished floor levels should be set above the 1% AEP flood level with an appropriate allowance for climate change to reduce the risk of flooding to property and future occupants. We recommend that finished floor levels are raised at least 300mm above this level. This will reduce the risk of flooding to people and property. Where this is not practical we recommend incorporating flood resilience and resistance measures up the 1% AEP plus appropriate allowance for climate change flood level.

Flood warning and emergency response- advice to LPA/applicant

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.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 173 of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal. We acknowledge the FRA proposes that "an evacuation route north away from the river would be possible along Bridge Street to Church Street and Church Road". However, according to hazard data available from the Thames (Pangbourne to Sonning) 2019 model this suggested route does pose a danger to some people (e.g. the elderly and infirm).

This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

Other Consents – advice to applicant

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 <http://www.environment-agency.gov.uk/business/topics/permitting/default.aspx>

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.

Yours faithfully

**Miss Amy Richardson
Planning Officer**

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