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



Our ref: WA/2024/131637/02-L01
Your ref: PL/24/0846
Date: 08 October 2024

Dear Sir/Madam,

Demolition of existing buildings and erection of new buildings of 11 and 12 storeys, with amenity space at roof level (part indoor and set back), to provide 576 build to rent residential dwellings (class c3) with residential amenity space, parking, landscaping and associated engineering works.

Napier Court, Napier Road, Reading

Thank you for consulting us on the above application on 21/08/2024. Apologies for our delay in responding to you. We have reviewed the application in line with our planning remit.

Environment Agency position

We have **no objections** to the application as submitted, please review the information included below.

Flood mitigation - advice to applicant & Local authority

Although we have no objections to the proposed development, the developer may wish to include measures to mitigate the impact of more extreme future flood events. Measures could include raising ground or finished floor levels and/or incorporating flood proofing measures. Further guidance on preparing properties for flooding can be found at <https://www.gov.uk/government/publications/prepare-your-property-for-flooding>.

Sequential Test - Advice to Planning Authority

What is the sequential test, and does it apply to this application?

In accordance with the National Planning Policy Framework (paragraph 168), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

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- Householder developments such as residential extensions, conservatories, or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test, which are consistent with the use for which the site was allocated.

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

Who undertakes the sequential test?

It is for you, as the local planning authority, to decide whether the sequential test has been satisfied, but the applicant should demonstrate to you, with evidence, what area of search has been used. Further guidance on the area of search can be found in the planning practice guidance [here](#).

What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance [here](#).

Other consents - Advice to applicant

As you are aware we also have a regulatory role in issuing legally required consents, permits or licenses 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. This includes any proposal to undertake work in, over, under, or within 8 meters of the top of the bank of a designated Main River, called a Flood Risk Activity permit. Please see <http://www.environment-agency.gov.uk/business/topics/permitting/default.aspx>

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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