

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

Our ref: WA/2024/131874/01-L01
Your ref: PL/24/1520

Date: 08 January 2025

Dear Sir/Madam

External Refurbishment Of An Existing Office Building (Use Class E) Including Alterations To The Main Entrance Space, Elevations, Installation Of Solar Photovoltaics (PV) Panels And Electric Vehicle Charging Points, Replacement Plant Equipment, External Lighting, Erection Of A New Cycle Store With Changing Facilities, A New External Pergola And Associated Landscaping Works.

300 Brook Drive , Green Park, Reading, RG2 6UU

Thank you for consulting us on this application on 22 November 2024. Thank you for allowing us an extension of time in which to provide this response. We have reviewed the information submitted with the application in line with our planning remit, including the following documents:

- Flood Risk Assessment – 300 Brook Drive, Green Park. Flood Risk Assessment prepared by Stantec on behalf of Green Park (Reading) No.1 LLP c/o Mapletree. (Revision A, October 2024)
- Location Plan – Planning Portal reference: PP-12781067v1 (14-Nov-2024)
- 300 Brook Drive, Reading Design Access Statement – Stride Treglown (October 2024)
- Appendix C Technical Drawings
 - 300 Brook Drive Green Park, Reading RG2 6UB – Drawing Title: EOJF – Proposed GA Plan (Revision P22 - 21/10/2024)
 - 300 Brook Drive Green Park, Reading RG2 6UB – Drawing Title: Proposed Site Plan (Revision 23 – 23/10/2024)
 - 300 Brook Drive Green Park, Reading RG2 6UB – Drawing Title: Proposed Building Elevations – Sheet 1 (Revision P22)
 - 300 Brook Drive Green Park, Reading RG2 6UB – Drawing Title: Landscape General Arrangement, Drawing No. 1004_PL_001 (Revision P08 – 07/08/2023)
 - 300 Brook Drive Rendered Masterplan Stage 2 – drawing no. 1004_PL_002 Revision No. P07 (11/01/24)

The fashion industry accounts for 10% of global carbon emissions (aviation accounts for 2%!). The carbon footprint of a reused t-shirt is about 60 times smaller than a new one, and could save between eight and 16 times more carbon than recycling it [Source: *The Sustainable(ish) Living Guide* by Jen Gale; *Changing Fashion – What people want from a greener clothing industry*, Green Alliance, April 2024]. You can reduce your carbon footprint by swapping and shopping preloved instead of buying new.

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). The site is covered by the Kennet (Tyle Mill to Thames Confluence) 2018 model, which places the proposed development outside of the design flood extent.

Environment Agency position

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following **planning condition** is included.

Condition

The development shall be carried out in accordance with the submitted flood risk assessment (300 Brook Drive, Green Park. Flood Risk Assessment prepared by Stantec on behalf of Green Park (Reading) No.1 LLP c/o Mapletree. (Revision A, October 2024)) and the following mitigation measures it details:

- There shall be no built development within the 1% Annual Exceedance Probability plus 25% climate change flood extent in accordance with the submitted FRA section 7.2.2.

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

In accordance with paragraph 181 of the NPPF, to prevent an increase in flood risk elsewhere by ensuring that the flow of flood water is not impeded, and the proposed development does not cause a loss of floodplain storage.

Advice to LPA – Safe access and egress

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 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 development in making their decisions.

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 agree that this indicates that there will be 'no danger to people'.

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.

Advice to applicant – Environmental Permit

The applicant may require a Flood Risk Activity Permit (FRAP) to undertake the

proposed works as the main river runs adjacent to the site. The applicant would need to demonstrate that the proposed works will not adversely impact on flood risk or the watercourse.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> 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.

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

Final comments

Thank you again for consulting us. Our comments are based on the best available data and the information as presented to us.

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