

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

Our ref: WA/2025/132125/01-L01
Your ref: PL/25/0470
Date: 08 April 2025

Dear Sir/Madam

Change Of Use Of Ground To 4th Floors From Class E (Offices) To C3 (Dwelling Houses) To Comprise 77 Self-Contained Flats. Prior Notification Under Class Ma, Part 3 Of Schedule 2 Of The Town And Country Planning (General Permitted Development) Order 2015.

121 Kings Road, Reading, RG1 3ES

Thank you for consulting us on this prior approval application, on 28 March 2025. The documents associated with the application became available on 31 March 2025. We have reviewed the application in line with our planning remit, including the following documents:

- FRA (ref C3480-R1-REV-A, dated March 2025 and prepared by Nimbus Engineering Consultants).

This site is within 8 metres of the designated main river Kennet.

Environment Agency position

We have **no objection** to this application.

Information about Flood Risk

We updated our flood risk information in early 2025 as part of our new national flood risk assessment (NaFRA2). We have used new and improved methods to update our assessment of flood risk across England. This has led to updated flood risk ratings in many locations. The site is now within Flood Zones 2 and 3, 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.

On 25 March 2025, we published updated Flood Zones alongside other datasets for use in development. Planners and flood risk professionals – find out more at [Development planning \(including Flood Map for Planning\)](#). Guidance for developers is available through the [Town and Country Planning Association](#) [New national flood and coastal erosion risk information - Town and Country Planning Association](#)

However, this change in Flood Zone is because information is incorrectly being pulled through our New National Model.

Instead, our local detailed model, Kennet (Tyle Mill to Thames Confluence) 2018, should be used to inform the Flood Zones in this location. This modelling shows the site as lying fully within **Flood Zone 1**, which is defined by the NPPF and PPG as having a low probability of flooding. Therefore, we have no objection to the application. *This issue should be rectified in the next update to the Flood Map for Planning.*

Advice to applicant – Environmental Permitting

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 Local Authority - Flood warning and emergency response

The application site is on an island in the River Kennet. In accordance with paragraph 181 of the National Planning Policy Framework (NPPF), you must ensure that the residual flood risk is safely managed and that safe access and escape routes are included. 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.

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 181 of the NPPF and the guiding principles of the PPG.

We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

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.

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.

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