

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

Our ref: WA/2025/132216/03-L01
Your ref: PL/25/0642
Date: 04 June 2025

Dear Sir/Madam

Change Of Use Of Ground, First, Second, Third And Fourth Floors (All Floors) From Class E (Offices) To C3 (Dwelling Houses) To Comprise 78 Apartments (27 X Studios, 43 X 1 Bed And 8 X 2 Bed Apartments). Prior Notification Under Class Ma, Part 3 Of Schedule 2 Of The Town And Country Planning (General Permitted Development) Order 2015.

Abbey Wharf, 57-75 Kings Road, Reading, RG1 3AB

Thank you for reconsulting us on this application, on 21 May 2025. Further to our previous response (letter with reference WA/2025/132216/02-L01, dated 20 May 2025), additional information has been provided and reviewed in line with our planning remit:

- Flood Risk Assessment ref 2676 Version 1.0 (UK Flood Risk, 28/04/2025).

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). Detailed modelling at this location, the Kennet (Tyle Mill to Thames Confluence) 2018 model places the site partly within the 3.3% annual exceedance probability (AEP) outline, however we have compared the 3.3% AEP height grid with the topographical survey, and the ground level is higher than the 3.3% flood level, therefore the site is not considered to be within Flood Zone 3b.

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.

Reason

The submitted FRA does not comply with the requirements for site-specific flood risk

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](#)

assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development.

In this instance the developer's flood risk assessment (Project Ref: QFRA 2676, dated 28/04/2025) fails to:

- use the most up to date available information to assess flood risk
- take the impacts of climate change into account
- 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.

This proposal is also contrary to policy EN18: Flooding And Sustainable Drainage Systems in the Reading Borough Local Plan.

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 and we'll respond within 21 days of receiving it.

Specifically the FRA will need to:

- use detailed modelling
- 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 is affected by the Kennet (Tyle Mill to Thames Confluence) 2018 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 a FRA for a development.

Information from our flood model should be used to inform an 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.

Please note that Environment Agency models are not designed to assess third party developments, so it should not be assumed that they are suitable for the proposed development. There may also be new information available since the creation of the model that should be considered, such as hydrological and topographical information. It is for the applicant to check the suitability of an existing model and make any necessary updates. More information on modelling can be found here: [Using modelling for flood risk assessments](https://www.gov.uk/guidance/using-modelling-for-flood-risk-assessments) - GOV.UK (www.gov.uk)

Climate change

The FRA acknowledges that “The Central allowance for the Kennet and Tributaries Management Catchment and the Thames River Basin District is 21% for the period between 2070 and 2115.” This is the correct climate change allowance for the development proposed.

However, there is no actual assessment of the 1% 21% CC AEP flood event to the site. 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.

By requesting the Kennet (Tyle Mill to Thames Confluence) 2018 model, as described above, the applicant can assess the change of use in relation to the risk to people and property.

Finished floor levels

The FRA states that “the finished floor level will be set at the current level”. As submitted, it is unclear what the current finished floor level is and 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.

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 600mm above this level in accordance with Flood risk assessment: flood zones 1, 2, 3 and 3b - GOV.UK. This will reduce the risk of flooding to people and property.

Advice to Planning Authority/Applicant – Flood Warning and Emergency Response

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 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. The FRA Appendix F (Flood Evacuation Plan) provides an access and egress route. However, the hazard from the route has not been assessed as modelling has not

been used. The route the applicant proposes according to the Kennet (Tyle Mill to Thames Confluence) 2018 model 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, the River Kennet, runs adjacent to the site. As submitted, it is **unlikely that a permit would be granted**. Further plans and method statements, including any landscaping plans, are required to understand the impact on flood risk. 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 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.

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.

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