

Ref: PL/24/1614

EA ref: WA/2025/131946/05

26 August 2025

Dear Sir/Madam

Demolition Of Existing Dwelling And Outbuildings And The Erection Of A4-Bed Detached Dwelling With Garage.

Warren Creek The Warren Reading RG4 7TQ

Thank you for reconsulting us on this application, on 6 August 2025.

Environment Agency Position

The Flood Risk Assessment (Revision F) does not satisfactorily address our earlier concerns and meet the requirements for site specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance.

We therefore **maintain our objection** set out in our response dated 25th June 2025.

Reasons

The submitted Flood Risk Assessment & Suds Report for Warren Creek (FRA), document No C3429-R1-REV-F, compiled by Nimbus Engineering Consultants Limited and dated July 2025 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 planning practice guidance and its site-specific flood risk assessment checklist.

This proposal is also contrary to policy EN18 - Flooding and Sustainable Drainage Systems in the Reading Borough Council Local Plan adopted in November 2019.

The FRA does not therefore adequately assess the flood risks posed by the development.

In particular, the FRA fails to:

- consider how a range of flooding events (including extreme events) will affect people and property
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- take the impacts of climate change into account:

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- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for 2080's Higher Central Allowance.

Consequently, the development proposes inadequate:

- Flood storage compensation
- Safe access and escape routes

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 demonstrate that any loss of floodplain storage within the 1% AEP plus an appropriate allowance for climate change can be directly compensated for to prevent an increase in flood risk elsewhere.

The following points must be addressed:

Loss of floodplain storage

a) existing footprint to be demolished

We understand the total footprint to be demolished is 215.28m². This includes a number of outbuildings and a slipway. We have concluded that only the workshop/shed with an existing footprint of 13m² is not floodable. **All** other existing outbuildings such as garages, sheds and greenhouses are considered floodable and therefore do not contribute to existing footprint.

b) Permitted development built footprint

We note the total footprint to be demolished also includes the built footprint associated with the permitted development of approximately 30m², which was formally approved by Reading Borough Council on 1st November 2024. Please note the proposed extension was never constructed and **does not** contribute to the existing built footprint.

The proposed built footprint therefore exceeds the existing built footprint by approximately 63m². This increase in built footprint within the floodplain must be compensated for to ensure the development does not increase flood risk elsewhere.

Floodplain compensation

In conjunction with the NPPF, Paragraph 049 the PPG states: Other flood risk considerations - How to assess the suitability of development where there is a possibility it will increase flood risk elsewhere the following Flood Storage Hierarchy needs to be followed:

- Sequential Approach (Site Layout)
- On site level for level compensation
- Off-site level for level compensation (Hydraulically & hydrologically linked)

Unfortunately, the FRA does not demonstrate why the provision of flood compensation is not possible. We note, section 1.2 (Page 4) of the FRA, confirms “Whilst opportunities to offset a new build by removing earth towards the entrance would be possible, the road suffers from subsidence, and this activity has the potential to exacerbate further road subsidence in the future”. The FRA does not expand on this further. This statement should be supported by more evidence, such as drawings/surveys to further support this claim.

Safe access and egress

The FRA has stated that access and egress to the site will be feasible during an extreme fluvial event via a mesh bridge in conjunction with the proposed Flood Action Plan. Unfortunately, the proposed height of the bridge of 38.50m AOD is below the assessed Design Flood Level of 39.20m AOD confirmed in Section 3.3 (Page 12) of the FRA. The bridge must be raised to the design level.

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

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