

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

Our ref: WA/2025/131946/06-L01
Your ref: PL/24/1614

Date: 29 October 2025

Dear Reading Borough Council

Demolition of existing dwelling and outbuildings and the erection of a 4-bed detached dwelling with garage

Warren Creek The Warren Reading RG4 7TQ

Thank you for contacting us in relation to the above application. We note from your email dated 9th October 2025 that your Authority is minded to approve this application citing the wider sustainability benefits outweighing the harm.

While we acknowledge the proposals to construct a modern property, that is further from the river bank and designed to be resilient to the risk of flooding, we wish to formally maintain our objection to this planning application for the reasons given in our previous responses as our concerns have not been resolved.

Specifically, we remain concerned that:

- The use of floodable voids beneath a building should not normally be used as a way to compensate for the loss of flood storage from new buildings or an increase in the size of existing buildings. This is specified in paragraph 049 of the flood risk and coastal change planning practice guidance. Floodable voids as a compensation measure are unreliable as they can become blocked during a flood event, require the imposition of an enforceable condition to ensure the void space is not used for storage of belongings and materials which would reduce the flood storage capacity and require a commitment from the occupier to a regular maintenance schedule (again through an enforceable planning condition) to ensure the void space is able to store flood water when needed.

We acknowledge that there is little opportunity for level for level flood compensation on this site due to other factors and potentially no opportunity for flood compensation off-site, although off-site compensation has not been fully explored by the applicant.

- No evidence has been provided to ensure the void space is able to deliver some form of level for level compensation, so at least as much flood storage capacity is available in comparison to the existing situation. If level for level cannot be provided in the void space then it should be designed to provide a betterment in terms of flood storage volume. While the applicants FRA says some existing solid structures on site will be removed that, in combination with the voids will deliver an increase in flood storage capacity, the photographs provided clearly show that they are not watertight and some internal flooding would almost certainly occur. We normally discount these types of structures from flood storage calculations for this reason.
- Voids should be designed in line with Environment Agency guidelines which are: void openings should extend from ground level to above the design flood level and be on all sides of the building. The voids should be at least 1m wide in every 5m of wall. Submitted elevation drawings show the number of voids but the height is not identified. Based on the finished floor level identified on the plan, the soffit of the voids would be below design flood level.
- Details of the maintenance requirements have not been provided. Access into the void space for maintenance should be possible without training or risk of injury and it must be apparent that blockages can be easily identified and removed.
- Details of blockage scenarios and the likely impact elsewhere have not been provided. Details of the potential risks and consequences to the applicant and the occupants of surrounding properties should be identified. There should be no increase in flood risk elsewhere in order to meet paragraph 181 of the NPPF and the application should ensure there is no reduction in flood storage capacity, no impedance of flood flow and where possible reduce flood risk both on and off site in accordance with policy EN18 of your Authority's local plan.

Taking this into account, should your Authority proceed with approval despite these concerns, we strongly urge the imposition of robust mitigating conditions to reduce the flood risk impact.

Condition 1

The development hereby permitted must not be commenced until such time as a scheme to mitigate flood risk impact has been submitted to, and approved in writing by, the LPA. The scheme shall include:

- Detailed proposals of the compensatory flood storage being provided.
- Details of the void design, including the height of the openings from ground level to above design flood level.
- Details to ensure there will be no ground level raising on site.
- Void blockage scenario analysis for multiple flood events up to and including the design flood, including a reasonable worst case scenario.

The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the LPA.

Reason

To reduce the risk of flooding to the proposed development and future occupants and to reduce the risk of increasing flood risk elsewhere.

Condition 2

The void space beneath the building shall be retained as open and unobstructed at all times. No development, storage, or use of this space shall take place that would impede the free flow of flood water. This area shall not be enclosed, filled, or otherwise altered without the prior written approval of the Planning Authority.

Reason

To reduce the risk of flooding to the proposed development and future occupants and to reduce the risk of increasing flood risk elsewhere.

Condition 3

Existing structures as shown on drawing ref. C3429-04 E in Flood Risk Assessment C3429-R1-REV-F, will be removed in accordance with a schedule that has been submitted to and approved in writing by the Planning Authority, prior to any development commencing.

Reason

To reduce the risk of flooding to the proposed development and future occupants and to reduce the risk of increasing flood risk elsewhere.

Condition 4

The development hereby permitted must not be commenced until details of the maintenance of the flood voids have been submitted to and approved in writing by the Planning Authority. The voids and openings shall be maintained a) in accordance with these approved details and b) for the lifetime of the development.

Reason

To reduce the risk of flooding to the proposed development and future occupants and to reduce the risk of increasing flood risk elsewhere.

Condition 5

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 or any order revoking and re-enacting that order with or without modification, no structure shall be erected within the curtilage of the property.

Reason

To prevent an increase in flood risk elsewhere.

Advice to Planning Authority - 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 173 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.

We can confirm that this indicates that there will be:

- A danger to most people (e.g. there will be danger of loss of life for the general public).
- A danger for all people (e.g. there will be danger of loss of life for the general public and the emergency services).

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.

Environmental permit – Flood risk activities - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river

- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](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.

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.

Closing comments

As you are aware, the discharge and enforcement of planning conditions rests with your authority. You must therefore be satisfied that the proposed conditions meet the requirements of the 6 tests in paragraph 57 of the NPPF. Please notify us immediately if you are unable to apply our suggested conditions to allow further consideration and advice.

Please consult us on the details submitted to discharge these conditions and on any subsequent amendments/alterations to the details/proposal.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact the advisor identified below.

Yours sincerely

Miss Sarah Green
Sustainable Places - Planning Advisor

Direct e-mail planning_THM@environment-agency.gov.uk