

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

Our ref: WA/2020/127794/01-L01
Your ref: 200328
Date: 14 May 2020

Dear Mr Conlon

Outline planning permission for demolition and redevelopment to comprise: up to 115,000 sqm gea in one or more land uses comprising: residential (class c3 and including prs); offices (use class b1(a); development in use classes a1, a2, a3 (retail), a4 (public house), a5 (take away), c1 (hotel), d1 and d2 (community and leisure); car parking; provision of new plant and renewable energy equipment; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting; and for the laying out of the buildings. Vastern Court, Caversham Road, Reading.

Thank you for your consultation on the above planning application.

The site lies within Flood Zones 2 and 3 in accordance with our flood map for planning. Flood Zone 3 is defined as having a high probability of river flooding in accordance with Table 1 'Flood risk' of the Planning Practice Guidance.

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(s)

The submitted FRA does not comply with paragraph 163 of the National Planning Policy Framework (NPPF) and the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance as the FRA does not have sufficient detail about the flood risks and mitigation measures. In particular, the FRA fails to:

- Consider how people will be kept safe from the identified flood hazards
- Demonstrate how safe egress and access will be maintained during a flood event
- The proposed flood mitigation methods identified for compensating displaced flood water have not been adequately justified.

Cont/d..

Overcoming our objection

To overcome our objection, the applicant should submit additional information which addresses the points highlighted above, specifically:

- How will the volumetric compensation be installed and what volume is being compensated.
- Are there any alternative locations to provide compensation avoiding the egress and access routes?

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.

This objection is supported by policy EN18 Flooding and Sustainable Drainage Systems of the Reading Borough Local Plan adopted November 2019.

Notes to local planning authority regarding decision

If the Local Authority are minded to grant permission against our recommendation, we request the Local Authority reconsult us for further representation. Please note we may have comments and conditions in other areas of remit following reconsultation.

In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), please notify us by email within 2 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.

Advice to local planning authority - Flood Risk - Safe Access and Egress

The proposed development and/or the access route is located within the 1% annual probability (AP) plus an appropriate allowance for climate change flood extent.

In accordance with paragraph 163 of the National Planning Policy Framework (NPPF), you must ensure that 'the development is appropriately flood resistant and resilient' and that 'safe access and escape routes are included where appropriate, as part of an agreed emergency plan...'. This is on the understanding that you have concluded that the proposed development has passed the flood risk sequential test as required.

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 enclose a copy of our safe access and egress guidance statement to assist you with your assessment. Please note we have not assessed the proposed access and egress route.

Advice to LPA - Sequential test

In accordance with the National Planning Policy Framework paragraph 158, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for you to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework. Our flood risk standing advice reminds you of this and provides advice on how to do this.

Final Comments

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us.

Please quote our reference number in any future correspondence.

If you have any queries please contact me.

Yours sincerely

Miss Michelle Kidd
Planning Advisor

Direct dial 02030259712

E-mail planning_THM@environment-agency.gov.uk

cc Barton Willmore