

Dear Ms Greenway

These are the comments of the Caversham and District Residents' Association (CADRA) that we ask the Examiner to consider during the Stage 2 Hearings for the RBC Local Plan Partial Update.

They relate to Matter 10: Site-specific policies for Caversham and Emmer Green. Issue 4: Are the policies for Caversham and Emmer Green justified, deliverable and consistent with national policy?

The Level 2 Strategic Flood Risk Assessment - Reading Boat Club, Thames Promenade (CA1a) (SFRA) commissioned by RBC for site CA1a (RUBC land) and dated May 2025 was not available to CADRA when we submitted our original LPPU comments. We therefore ask that these additional points are considered.

The SFRA concludes that; as the site lies within Flood Zones 2, 3a and 3b, only the Flood Zone 2 area could be considered for development, and then for no more than approximately 18 homes.

Flood Zone 2 remains a flood-risk area, and the Sequential and Exception Tests should therefore carry significant weight. Given the very limited developable area and the substantial mitigation measures required, it is reasonable to question whether development of this scale is proportionate or justified.

A Sequential Test would need to consider the major housing schemes already approved or proposed nearby, which will deliver hundreds of homes on lower-risk land south of the river. These sites could readily accommodate an additional 18 dwellings, therefore, in accordance with National Planning Practice Guidance (NPPG), a more appropriate location can and should be found for the dwellings.

The planning need in Caversham centre is not for increased housing density in a constrained floodplain location, but for enhanced public amenity space to support the existing community, as set out in our original comments.

For these reasons CADRA asks that site CA1a be removed from the list of sites in the Local Plan.

Supporting evidence for CADRA's request is as follows:

The National Planning Policy Framework (NPPF) guidance supporting our arguments are:

- The NPPF (Dec 2024) point 174 states that 'Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source'.

- On 17th September 2025, the government published an update to the Flood Risk and Coastal Change NPPG which states.

“A sequential, risk-based approach to the location of development should be applied at all stages of the planning process so as to avoid, where possible, flood risk to people and property. The aim should be to steer new development to Flood Zone 1 (areas with the lowest risk of flooding from rivers or the sea).”

Similar and nearby application dismissed at appeal

It should be noted that Reading Borough Council recently opposed a different planning application on Christchurch Meadows. This was taken to appeal and refused again on appeal to the planning inspectorate: Appeal Ref: APP/E0345/W/25/3364774

Main Issues included in this upheld objection included:

- The effect on the character and appearance of the area,
- And the impact on flooding and the conclusion was that “The development would be at an unacceptable risk of flooding. Thus, it conflicts with policy EN18 of the Local Plan, insofar as it seeks to direct development away from areas at the highest risk of flooding, in line with the requirements of the Framework. The scheme also conflicts with the flooding protection aims of the Framework.”

With regard CA1a (RUBC land) the same issues regarding impact on the character and appearance of the area and the impact on the risk of flooding apply.

Site CA1a SFRA

The SFRA dated May 2025, is before the changes (September 2025) to the NPPG (which clearly states that development should be steered to Flood Zone 1).

The SFRA document states that 34% of the part is flood zone 3b and so is not developable. This is clearly stated in the NPPG at Table 2, where it sets out the acceptability of development considering its flood risk vulnerability and flood zone ‘incompatibility’ and clearly states that more vulnerable development should not be permitted in Flood Zone 3b.

Figure 3 Fluvial Flood Map shows that almost all the site will be within Flood Zone 3 when considering climate change. This is important for ‘the lifetime’ of any proposed application. As such this does not appear to be an appropriate place to develop.

Part of the exit and egress in the event of flood via Abbotsmead Place are indicated as ‘dangerous for some’. As such it states that early flood warning is essential and yet we know in the January 2024 floods residents said that they did not get the warning until it was too late.

The SFRA states that 'To facilitate this, the majority of ancillary infrastructure such as car parks and green spaces could be located in higher flood risk areas; however no development should be located in Flood Zone 3b'.

This appears to be completely against the NPPG policy which clearly states in Annex 3 that Flood Zone 3b should be for 'water compatible development' such as water-based recreation, which is exactly what is currently in that location, a rowing boat house. Also placing a car park (which could not have a wall against it) would have an impact on 'the character of the area', which is clearly laid out in the Reading Borough Local Plan May 2025 highlighting what an important asset Christchurch Meadows is.

Furthermore the SFRA fails to mention that:

- Cars parked in this area were lost to the flood in January 2024. The SFRA gives no mention of where these cars should be moved to. Equally the idea that residents should move into an area of greater risk to save one of their most valuable assets is concerning from a safety point of view.
- Some of the properties in this vicinity of this area are apparently struggling to get insurance because of their construction and the fact that they are in a flood zone, despite the existence of Flood Re. This means that the properties will potentially find it difficult to secure a mortgage. As a reminder Flood Re itself runs out in 2039, much sooner than the proposed lifetime of this development.

The site appears to offer no option to offer compensation for the increased flood risk that it will impose upon other Reading residents, a point highlighted in the SFRA. The NPPG states that:

- No Net Loss: Development must result in no net loss of floodplain storage.
- Level-for-Level and Volume-for-Volume: Compensation must be provided on a "level-for-level" basis. This means for every 100mm (or "slice") of storage volume lost at a specific elevation, an equivalent volume must be created at that same elevation elsewhere on the site.
- Prohibition of Voids: Updated guidance states that using under-floor voids (e.g., stilts or air bricks) to compensate for loss of storage is no longer acceptable as a primary mitigation measure.

As such it is very hard to see how any proposed development site could be acceptable under the NPPG.

Climate Change

This area is called Christchurch Meadows for a reason; it stores water during floods. We note the comments that the Lead Councillor for Climate Change made when talking about developing on another flood plain in Reading

“Water is the most resilient threat posed by the elements– if you stop up the water in one place, it will simply go somewhere else. At times of high rain– which is a permanent factor now– you discharge water into fields to alleviate pressure on rivers.” –

“Floodplains keep water out of the rivers, and these fields have been highly effective in that for such a long time.” – “Any development on that site will have knock-on effects downstream.”

Kind regards

Malcolm Pemble

Caversham and District Residents Association

(Including Emmer Green)

www.cadra.org.uk

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