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Connie Davis  
Wokingham Borough Council  
Shute End  
Wokingham, Berkshire  
RG40 1BN

**Our Ref:** 231641

11 March 2025

Dear Connie,

**31 BARKHAM RIDE, FINCHAMPSTEAD, WOKINGHAM, RG40 4EX**

We are writing to respond to your comments on the proposed development at the above site. We agree that the development of park homes should be classified as “*Highly Vulnerable*” and have updated our report to reflect this.

With regards to application of the Sequential Test, the PPG advises that changes of use can increase the vulnerability of a site and that site-specific flood risk assessments should therefore be undertaken where appropriate. The NPPF advises that the Sequential Test does not need to be undertaken for change of use applications “*except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.*”

176. Applications for some minor development and changes of use<sup>62</sup> should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63.

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<sup>62</sup> This includes householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be **applied as appropriate**.

<sup>63</sup> A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

By “*applied as appropriate*”, the NPPF suggests that, where a site-specific flood risk assessment shows the site to be within either Flood Zone 2 or 3, a Sequential Test should subsequently be undertaken for changes of use to mobile home / park home sites, due to the high vulnerability of these developments.

However, since the application site is securely within Flood Zone 1, the application of the Sequential Test is not required. Furthermore, it would not be possible to locate the development in a sequentially better flood risk zone as the site is already in Flood Zone 1. And so even if a Sequential Test were to be undertaken, the application site would either equal or surpass any other site brought forward as part of the test.

We trust this is acceptable and you agree that a Sequential Test is not required for this application.

Yours sincerely

Robert Steventon