

Planning Inspectorate

Reference: AP-0009904
LPA reference: 231062
PINS reference: 6011920

28 August 2026

Breach alleged without planning permission, the material change of use of the Land for non-agricultural storage purposes, including but not limited to shipping containers, vehicles, caravans and building materials.

The Loft, Part Lane, Swallowfield, Reading, RG7 1TB

Dear Planning Inspector,

Thank you for consulting us on this appeal.

The below comments are made in response to the following information:

- Grounds of Appeal, prepared by ET Planning, dated 25 June 2026.
- ENFORCEMENT NOTICE Change of Use ("Notice B Revised") ISSUED BY: WOKINGHAM BOROUGH COUNCIL ("the Council") for The Loft, Part Lane, Swallowfield, Reading, England, RG7 1TB, dated 27 May 2026
- Expediency Report RFS/2022/087747 & RFS/2023/087859, Wokingham Borough Council, dated 16.04.26

This statement is written **in support of Wokingham Borough Council's enforcement action** against the breach alleged without planning permission, the material change of use of the Land for non-agricultural storage purposes, including but not limited to shipping containers, vehicles, caravans and building materials at The Loft, Part Lane, Swallowfield, Reading, RG7 1TB.

Existing Flood Risk Data

The Enforcement Notice lists reasons for issuing the notice. Reason d. and the Expediency Report dated 16.04.26 states the Land is located in Flood Zone 3b. This is not correct, the current Flood Map for Planning places this site in Flood Zone 3a.

Flood Zone 3a is defined by Annex F of the NPPF as having a high probability of flooding, so whilst the Flood Zone designation is incorrect, reason d for issuing the notice still stands. The unauthorised development results in a loss of floodplain storage and could result in an increase in flood risk elsewhere.

If an application was made for this, it would need to be demonstrated by the applicant that the loss of floodplain storage (from any development/ structures/land raising) could be mitigated for by providing level for level compensatory floodplain storage outside the flood risk area.

As submitted this is contrary to Policy CP1 of the Wokingham Borough Local Development Framework Adopted Core Strategy dated January (2010) Policies CC09 and CC10 of the MDD and NPPF paragraph F7 because it has not been demonstrated that flood risk will not be increased onsite or elsewhere.

Emerging Flood Risk Data

This site is covered by the Blackwater model which is currently being updated to better represent flooding in the catchment. The modelling is not externally available at the time of writing, but we have checked the new model's outputs, and it places the site entirely in Flood Zone 2, which Annex F of the NPPF defines as having a medium probability of flooding. This means that if planning permission was submitted we would not have bespoke comments to make because it would be covered by Flood Risk Standing Advice, which would be for the LPA to review.

As outlined in paragraph F4 of the NPPF, applications within Flood Zone 2 require a Flood Risk Assessment to be submitted. No assessment of flood risk has been made within the information submitted for this appeal.

Conclusion

Existing flood risk data puts the site at a high-risk of flooding and emerging flood risk data puts the site at a medium risk of flooding. No assessment has been made on the impact of this development on flood risk, contrary to paragraph F4 of the NPPF.

We will leave the decision on which data the site should be assessed against to the Inspector. If current data is used, then for the development to be acceptable we would require it be demonstrated that there would be no loss of floodplain storage. If emerging data is used then it would be for the LPA to determine, however an FRA should still be submitted and include mitigation measures for the loss of floodplain. As it stands the submitted information is not acceptable.

If you have any questions regarding our response, please contact planning_thm@environment-agency.gov.uk.

Yours sincerely,

Amy Richardson, Planning Advisor

planning_thm@environment-agency.gov.uk
Red Kite House, Howbery Business Park, Wallingford, Oxfordshire, OX10 8BD