

Flood Risk Assessment

Cousins House, 1-3 Reading
Road, Finchampstead,
Wokingham, RG27 0RP

Prepared For
Mr S Makombe

5501
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bell cornwell

CHARTERED TOWN PLANNERS

Bell Cornwell LLP, Unit 2, Meridian Office Park, Osborn Way,
Hook, Hampshire RG27 9HY

01256 766673 | info@bell-cornwell.co.uk | bell-cornwell.co.uk



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1 INTRODUCTION

1.1 A retrospective planning application is being submitted on behalf of Mr S Makombe for

Change of use of the building from Class g(i) to a Patient Transport Service building
(Use Class Sui Generis)

At

Cousins House, 1-3 Reading Road, Finchampstead, Wokingham, RG27 0RP.



2 FLOOD RISK ASSESSMENT

- 2.1 Government guidance sets out when you need to prepare a flood risk assessment (FRA) for a planning application. The site is less than 1 ha but is in Flood Zone 2 and 3 and so, there is a requirement to complete an FRA.

DEVELOPMENT SITE AND LOCATION

- 2.2 The application site comprises an existing building with a lawful use, it is currently in Class E. Class covers the following:

- (a) Display or retail sale of goods, other than hot food
- (b) Sale of food and drink for consumption (mostly) on the premises
- (c) Provision of
 - (c)(i) Financial services
 - (c)(ii) Professional services (other than health or medical services), or
 - (c)(iii) Other appropriate services in a commercial, business or service locality
- (d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink)
- (e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- (f) Creche, day nursery or day centre (not including a residential use)
- (g) Uses which can be carried out in a residential area without detriment to its amenity
 - (g)(i) Offices to carry out any operational or administrative functions
 - (g)(ii) Research and development of products or processes
 - (g)(iii) Industrial processes



- 2.3 The building has historically been used as an office, Class (g)(i). However, there is the ability for the site to operate as any of the above uses without the requirement for planning permission.
- 2.4 However, the proposed use is said to be a Sui Generis Use by Wokingham Borough Council and so, outside the list of uses. Notwithstanding this, there is a need to consider the baseline uses that could occur on the site i.e. those listed in 2.2 above.
- 2.5 The site comprises a two-storey building. In association there is a car park to the rear with a grassed area beyond. The Long River is beyond the public Right of Way that is at the bottom of the grassed area.
- 2.6 The Flood Map for Planning website shows that the site is within Flood Zone 2/3 as demonstrated by Figure 1 below.



Figure 1 - Extract from the Flood Map for Planning website (Flood Zone 2 - light blue and Flood Zone 3 - dark blue)

- 2.7 Flood Zone 2 'highly vulnerable' is land which has between a 1 in 100 and 1 in 1000 annual probability of fluvial flooding and Flood Zone 3 'more vulnerable' is a land which has a greater than a 1 in 100 annual probability of fluvial flooding.
- 2.8 In considering surface water flooding there is only a small potential for flooding in the local area in the 1 in 1000 scenario. This is outside the red line associated with this planning application.



Figure 2 - Extract from the Flood Map for Planning website (blue areas are the 1 in 1000 scenario for surface water flooding)

2.9 No ground testing has been undertaken as there is no proposed change to the site.

2.10 The building connects to an established drainage network.

PROPOSAL

2.11 The proposal is looking to change the use of the building as identified above in the introduction. The development proposed is minor.

2.12 There are no physical works proposed. The car park will continue to be used for car parking.

2.13 There are no proposed changes to existing drainage (surface water or foul). The existing drainage will remain in situ.



3 PLANNING POLICY AND GUIDANCE

NATIONAL PLANNING POLICY FRAMEWORK

- 3.1 The NPPF sets out Government's planning policies and within this seeks to ensure that flood risk is taken into account at all states in the planning process and is appropriately addressed.
- 3.2 Footnote 63 of the NPPF states that "a site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3".
- 3.3 Paragraph 170 states that "inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".
- 3.4 Paragraph 173 states that "a sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below".
- 3.5 However, as set out within the Government guidance and paragraph 176¹ of the NPPF there are exemptions and so the following development is exempt from the sequential test:
- A householder development like residential extensions, conversions or loft conversions
 - A small non-domestic extensions with a footprint of less than 150sqm
 - **A change of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)**

¹ [National Planning Policy Framework](#)



- Solely at risk from surface water flooding and a site-specific FRA demonstrates it will be safe throughout its lifetime, without increasing flood risk elsewhere – this exemption does not apply to sources of flooding other than surface water.

3.6 Paragraph 181 of the NPPF is clear that development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- A) Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location
- B) The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment
- C) It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate
- D) Any residual risk can be safely managed
- E) Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

3.7 The existing use – Class E – Offices are classified as a “less vulnerable” use. The proposed use, whilst technically sui generis is very similar to an office use and that is what takes place within the existing building. In addition, there are non-emergency ambulances parked in the car park. In the event of flooding, this service will not be required to be operational or alternatively, for the temporary period of time workers will work from home and the ambulances can be parked in an alternative location. The use of the building can adapt in the event of a flood. The proposed use is also a “less vulnerable” use in line with the Government guidance².

² [National Planning Policy Framework - Annex 3: Flood risk vulnerability classification - Guidance - GOV.UK](#)



LOCAL PLANNING POLICY

- 3.8 Wokingham Borough Council's Managing Development Delivery Document (Local Plan) at policy CC09 (Development and Flood Risk (from all sources)) states:

Policy CC09: Development and Flood Risk (from all sources)

1. All sources of flood risk, including historic flooding, must be taken into account at all stages and to the appropriate degree at all levels in the planning application process to avoid inappropriate development in areas at risk of flooding. Proposals must be consistent with the guidance in paragraphs 99-104 of the National Planning Policy Framework (NPPF); the Technical Guidance to the NPPF and demonstrate how they have used the Strategic Flood Risk Assessment (SFRA) to determine the suitability of the proposal.
2. Development proposals in Flood Zones 2 or 3 must take into account the vulnerability of proposed development.
3. Development must be guided to areas of lowest flood risk by applying the sequential approach taking into account flooding from all sources and shall ensure flood risk is not worsened for the application site and elsewhere, and ideally that betterment of existing conditions is achieved. The sequential test will not be required if at least one of the following applies:
 - a) Replacement of an existing single residential property. However, the replacement property should, where possible, be located on the part of the site at lowest risk
 - b) Conversions and change of use unless it involves a change to a more vulnerable class
 - c) Minor development, as defined in footnote 10 of the Technical Guidance Note to the NPPF.
4. In exceptional circumstances, new development in areas of flood risk will be supported where it can be demonstrated that:
 - a) The development provides wider sustainability benefits to the community that outweigh flood risk
 - b) The development will:
 - i. Be safe for its lifetime, taking account of the vulnerability of its users
 - ii. Not increase flood risk in any form elsewhere and, where possible, will reduce flood risk overall
 - iii. Incorporate flood resilient and resistant measures into the design
 - c) Appropriate evacuation and flood response procedures are in place to manage the residual risk associated with an extreme flood event.
5. Where required, suitable and appropriately detailed flood risk information will need to accompany a planning application. A Flood Risk Assessment (FRA) is required for:
 - a) All proposals in areas of known historic flooding from all sources
 - b) Where there is evidence of a risk from all sources of flooding identified in the Strategic Flood Risk Assessment
 - c) Those proposals set out in footnote 20 to paragraph 103 of the NPPF.



4 CONCLUSION

- 4.1 It is acknowledged that the site is located within Flood Zone 2/3. Therefore, a Flood Risk Assessment is required and typically, a sequential test and exception test is required.
- 4.2 However, as identified above, where the proposal is looking to change the use there is not a requirement for a sequential test. Therefore, as this proposal is solely for a change of use with no physical works proposed there is no requirement for a sequential test.
- 4.3 The existing drainage is being retained. There are no physical works proposed meaning there is no increase in the impermeable area. Whilst the use is technically different as it would change from Class E to sui generis, in reality, the use is very similar to the lawful use in as much as the building would be used as an office and the car park would be used for parking. The building is not going to be fully utilised under the proposed use so there will be a reduction in the number of people using the site compared to if the building was retained in Use Class E. Both the existing and proposed use fall within the “less vulnerable” category.