

From: Planning_THM <Planning_THM@environment-agency.gov.uk>
Sent: 24 December 2025 12:00
To: Joanna Carter
Subject: RE: Application 243099 Land to the north of Reading Road (appeal)

Good morning Joanna,

Please find below a summary of our comments regarding flood risk and the proposed culverting. Apologies for the delay in getting them to you. If you have any questions, please email this inbox and myself or Judith will get back to you.

Flood Risk

In March 2025, the Flood Map for Planning was updated and flood risk on this site changed. The site is now located within Flood Zones 1, 2 and 3a.

The previously submitted FRA (Proposed Residential Development Land North of Reading Road, Arborfield – 14th November 2024 [Doc ref: DANS-E254-274] – Prepared by Terry Seymour) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere.

In particular, the FRA fails to consider how a range of flooding events (including extreme events) will affect people and property.

The applicant has not assessed the site using the most up to date information available. An FRA needs to be submitted that uses the most up to date data to assess flood risk onsite.

Additionally, we are opposed to the culverting of any watercourse because of the adverse ecological, flood risk, geomorphological, human safety and aesthetic impacts. Watercourses are important linear features of the landscape and should be maintained as continuous corridors to maximise their benefits to society. As submitted, it is unlikely that we would grant a flood risk activity permit for this application.

Watercourse crossings can have a significant impact on the flow and storage of flood water. This can lead to higher levels of flood water on the upstream side of the structure which will potentially increase the flood risk to nearby areas. Therefore, whilst bridges are preferable to culverts for watercourse crossings, new watercourse crossings should be avoided where possible and only proposed where they are necessary.

Bridges should be of clear span design, with abutments set back from the bank to allow for maintenance and improvement works and provide suitable space to allow mammals to pass. The soffit (underside) of the bridge should be set at least 600mm above the 1% annual exceedance probability plus an appropriate allowance for climate change flood level to allow flood water and floating debris to pass beneath the bridge, to prevent blockages. The bridge should not cause flooding either upstream, downstream or at the site.

This development is therefore contrary to paragraph 181 of the National Planning Policy Framework because it has not been demonstrated that the proposed development will not be increased elsewhere.

Nature conservation and ecology

We are also opposed to culverting from a nature conservation and ecology perspective.

Watercourses are important linear features of the landscape, including as wildlife corridors, and

should be maintained as continuous corridors to maximise their benefits to society. Culverting damages habitats, interrupts wildlife corridors and disrupts river habitat continuity. We request that the proposals are revised by designing clear span bridges in place of the culverts so that a continuous river corridor can be maintained.

Our preference is clear span bridges, which should be designed with the bridge abutments set beyond the top of the bank in order to allow a wildlife corridor between the river and the abutments. Additionally, a revised biodiversity net gain assessment should also be completed. This should incorporate the clear span bridge as part of the on site post intervention and ultimately show how the site will achieve a 10% net gain for the watercourse element.

Our opposition to culverting is supported by paragraphs 187 and 193 of the NPPF which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity.

Overcoming our concerns

An updated FRA needs to be submitted using the most up to date flood risk data.

The applicant should also demonstrate why culverting is both necessary and the only reasonable and practicable alternative. We strongly recommend that an alternative of a clear span bridges is considered or revisions to the site layout.

If it is robustly demonstrated that the culverting is both necessary and the only reasonable, practicable alternative, the length of any culvert should be restricted to the minimum necessary to meet the applicant's objective.

Kind regards

Amy Richardson

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Please note, I do not work on Tuesdays. I am on leave from today, returning 2nd Jan 2026.



Latest information on the Environment Agency's new national flood and coastal erosion risk information

25th March 2025 we have published new data in the Flood Map For Planning. The flood map includes updated flood zones reflecting existing local models and the new and improved national model, river and sea defended and undefended flood extents and surface water flood risk extents. Information on all the data we are publishing is available at [Defra Data Services Platform](#)
