

ELDER

GREYFRIARS HOUSE

20 - 30 GREYFRIARS ROAD , READING

FLOOD RISK ASSESSMENT & DRAINAGE STRATEGY REPORT
FORM STRUCTURES



Flood Risk Assessment and Drainage Strategy Report

Project Name

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Project Number

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Executive Summary

This Flood Risk Assessment and Surface Water Drainage Strategy (FRA) has been prepared by Form Structural Design ("Form") on behalf of Elder for the proposed redevelopment of 20-30 Greyfriars Road, Reading, RG1 1NS.

In accordance with the fundamental objectives of the National Planning Policy Framework (NPPF), the FRA demonstrates that:

- (i) The development is safe;
- (ii) The development does not increase flood risk; and,
- (iii) The development does not detrimentally affect third parties.

The Environment Agency (EA) data confirms that the Site is located entirely within Flood Zone 1 'Low Probability'. This flood zone is defined in Planning Practice Guidance (PPG), Flood Risk and Coastal Change, Table 1 as follows:

Flood Zone 1 'Low Probability': land having less than a 1 in 1000 (0.1%) Annual Probability of river or sea flooding.

The EA mapping also shows that some areas of the Site are at a 'Medium' or 'High' risk of surface water flooding, however these are small areas of ponding associated with the existing infrastructure. The proposed development will implement a new surface water drainage network that will manage surface water runoff from the Site. Therefore, the flood risk identified in the baseline scenario will not be present in the post development scenario.

The proposal is the demolition of the existing building and the erection of a part-7, part-13 storey building comprising 266 co-living units (Sui Generis) and associated communal amenity facilities and ground floor commercial space (Class E); and associated refuse storage, cycle parking and plant equipment.

The proposed surface water drainage strategy has been designed to manage runoff from the Site for all storm events up to and including 1 in 100 (1%) Annual Probability event, including a 40% climate change allowance. The design incorporates SuDS features to attenuate and treat surface water runoff, including permeable paving and below ground attenuation tanks. Surface water is proposed to be discharged into an existing 375m diameter Thames Water surface water sewer under Garrard Street. Peak run off rates are proposed to be limited to 2 l/s/ha, which is less than the existing site discharge and is as close to greenfield runoff rates for the Site as practically possible, as per the LLFA's requirements. A pump is proposed to facilitate site constraints while providing the necessary attenuation storage to discharge at 2l/s for all storms up to and including the 1:100 year storm event plus a 40% allowance for climate change.

Aspect of flood risk	Applicable Guidance/ Source of Data	Summary
Site Location	n/a	20-30 Greyfriars Road, Reading, RG1 1NS
Existing Ground Levels	Arena Property Searches	Ground levels are 38.70m AOD in Garrard Street, rising to the east and steeply to 39.84m AOD along Greyfriars Road, starting from 38.82m AOD in the northwest corner
Primary source of flood risk	Various data sets	Surface Water
Presence of flood defences	n/a	n/a
Proposed Development	Proposals by Darling Associates Architects	Demolition of the existing building and the erection of a part-7, part-13 storey building comprising 266 co-living units (Sui Generis) and associated communal amenity facilities and ground floor commercial space (Class E); and associated refuse storage, cycle parking and plant equipment.
Planning Aspects		
Flood Risk Vulnerability	Planning Practice Guidance (PPG) 'Flood Risk and Coastal Change'	'More Vulnerable'
Flood Zone		Flood Zone 1 'Low Probability'
Sequential Test		Sequential Test passed
Exception Test		n/a
Applicable Climate Change Allowances	EA climate change allowances guidance based on 100-year design life	Thames and South Chilterns Management Catchment: Peak River Flow: +21% (Central Allowance) Peak Rainfall Intensity: +40% (Upper End Allowance)
Proposed Mitigation Measures		
Surface Water Drainage	Surface Water Drainage Strategy by Form	Surface water will be managed using SuDS features, including, permeable paving and below ground attenuation tanks. The proposed surface water drainage strategy will restrict runoff to 2l/s for all events up to and including the 1 in 100 (1%) AP plus 40% climate change allowance, complying with requirements from the LLFA (Reading Borough Council).

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1 Introduction

1.1 Scope of Report

This Flood Risk Assessment and Surface Water Drainage Strategy (FRA) has been produced by Form Structural Design ("Form") on behalf of Elder for the proposed redevelopment of 20-30 Greyfriars Road, Reading, RG1 1NS.

The Site is located in Reading, Berkshire and Reading Borough Council (RBC) are the Local Planning Authority (LPA).

The planning application seeks "Demolition of the existing building and the erection of a part-7, part-13 storey building comprising 266 co-living units (Sui Generis) and associated communal amenity facilities, refuse storage, cycle parking and plant equipment."

The report is based on the available flood risk information for the Site as detailed in [Section 3](#) and prepared in accordance with the planning policy requirements set out in [Section 2](#). The scope of the FRA and Drainage Strategy report is consistent with the National Planning Policy Framework (NPPF) (December 2023) requirements and the 'Site-specific Flood Risk Assessment Checklist' from the associated Planning Practice Guidance (PPG).

1.2 Existing and Proposed Development

The Site lies entirely within the administrative boundary of Reading Borough Council.

The site comprises an eight-story office building that includes a basement level. A significant portion of the ground and basement floors is designated for vehicle and bicycle parking, with access provided via Garrard Street. The reception area is positioned in the north-western corner of the ground floor, accessible from both Greyfriars Road and Garrard Street. Office and meeting spaces are located on the first through sixth floors. Additionally, there is an alternative pedestrian access point from the first floor to Greyfriars Road, situated in the south-western corner of the site. The site is 1175m² (0.1175Ha) and is situated in the urban setting of Reading and is 600m from the River Thames.

The proposals seek to demolish the existing 7 storey office building with additional basement car park.

The development will provide circa. 266 co-living units (Sui Generis) and associated communal amenity facilities and ground floor commercial space (Class E); and associated refuse storage, cycle parking and plant equipment.

The proposed residential redevelopment has an assumed design life of 100 years. The proposed mitigation is therefore based on a design life for the development of 100 years, and the climate change allowances described in [Section 2.3](#) are also based on this assumption.

1.3 Sources of Information

The FRA has been prepared based on the following sources of information:

- British Geological Survey (BGS) online digital viewer
- Development proposals by Darling Associates and Henshall Green (see [Appendix A](#))
- Topographic survey by Arena Property Services Limited "A1-23134-13-B-T0574" dated March 2024, [Appendix B](#)), CCTV Drainage Survey by EMP Drainage dated October 2024 ([Appendix B](#)) and Thames Water Asset Records dated October 2024 (see [Appendix C](#))
- Site Investigation report 1981 ([Appendix D](#))

- Magic map webSite (<https://magic.defra.gov.uk/maintenance.html>)
- Reading Borough Plan, Reading Borough Council, 2019
- Strategic Flood Risk Assessment (SFRA), Reading Borough Council, 2017
- Reading Preliminary Flood Risk Assessment (PFRA), Reading Borough Council, 2011
- Local Flood Risk Management Strategy, Reading Borough Council, 2015

1.4 Caveats and Exclusions

This FRA has been prepared in accordance with the NPPF, the associated PPG and Local Planning Policy. The proposed flood management (including ground floor level recommendations) and surface water drainage strategies are based on the relevant British Standards (BS8533), the standing advice provided by the EA or based on common practice.

Activities during the construction phase may have an impact on the existing and future flood risk. Thus, an assessment of the risks and appropriate mitigation measures should be identified and managed by the contractor.

The Construction (Design and Management) Regulations 2015 (CDM Regulations) will apply to any future development of this Site which involves “construction” work, as defined by the CDM Regulations. As such it is the responsibility of the proposed developer (ultimate client) to fulfil its duties under the CDM Regulations.

The proposed development will adhere to the Building Safety Act 2022, and the current proposals in this report are in alignment with its regulations. Additional documents will be prepared in subsequent design stages to ensure full compliance with all requirements of the Building Safety Act.

The approach for the FRA and proposals for the surface water management strategy are based on the requirements of the EA and RBC in its role as Lead Local Flood Authority (LLFA). The findings of this FRA are based on data available at the time of the study and on the subsequent assessment that has been undertaken in relation to the development proposals as outlined in [Section 1.2](#). As such, we recommend the end user reviews the validity of the flood data on an annual basis with the EA.

It should be noted that the insurance market applies its own tests to properties in terms of determining premiums and the insurability of properties for flood risk. Those undertaking development in areas which may be at risk of flooding are advised to contact their insurers or the Association of British Insurers (ABI) to seek further guidance prior to commencing development. Form does not warrant that the advice in this report will guarantee the availability of flood insurance either now or in the future.

2 Planning Policy Context

This FRA has been prepared in accordance with the relevant national and local planning policy and statutory authority guidance as detailed in this chapter.

2.1 National Policy and Guidance

National policy contained within the **National Planning Policy Framework (NPPF)** issued by Ministry of Housing Communities and Local Government, with reference to Section 14 'Meeting the challenge of climate change, flooding and coastal change'; and,

- i. The associated **Planning Practice Guidance (PPG)** was released in March 2014 (with reference to the 'Flood Risk and Coastal Change' section) and last updated August 2022
- ii. The NPPF and PPG demonstrate a flood risk management approach for the lifespan of the proposed development considering the effects of climate change. The document sets the framework to minimise vulnerability, provide resilience to the impacts of climate change, and to fully consider the potential impacts of climate change for the lifetime of the development within the mitigation measures.
- iii. In May 2022 the guidance within the PPG on the application of climate change allowances in flood risk assessments was significantly updated: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

The guidance provides contingency allowances for the potential increases in peak river flow, peak rainfall intensity and sea level rise which are considered accordingly subject to the site conditions – discussed further in **Section 2.3**.

The NPPF sets out the requirement for the Sequential Test and Exception Test in paragraphs 168 and 169 respectively:

168. *The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.*

169. *If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3"*

These Tests are to be applied where appropriate, depending on the proposed development flood risk 'vulnerability' and the Flood Zone in which it is located. This is detailed further in **Section 9**.

2.2 Local Policy and Guidance

2.2.1 Local Plan

Local planning policy contained within the Reading Borough Local Plan (2019), with particular reference to EN18: Flooding and Sustainable Drainage Systems.

EN18: FLOODING AND SUSTAINABLE DRAINAGE SYSTEMS

Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding. Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site.

All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS.

2.2.2 Strategic Flood Risk Assessment (SFRA)

The SFRA is a planning tool, allowing local authorities to assess the location of future development with regards to flood risk. Moreover, the document provides an overall understanding of the flood risk within the study area considering all potential sources.

Reading Borough Council Strategic Flood Risk Assessment SFRA (2017) offers advice to the decision makers on planning applications and planning requirements for new developments. It is therefore essential that the Council are in a position to take informed decisions, providing a careful balance between the risk of flooding and other unrelated planning constraints that may place pressure upon 'at risk' areas.

The SFRA has been reviewed with respect to flood risk at the Site as reported in [Section 4](#).

SFRA Section 13.3. contains guidance on the design parameters for Sustainable Drainage Systems.

13.3 SuDS Requirements for New Development

13.3.1 As of April 2015, the Lead Local Flood Authority (LLFA) has become the statutory consultee for surface water management on planning applications for 'major development'. As the LLFA, RBC are therefore responsible for the approval of surface water drainage systems within such development. Major development consists of any of the following:

- *The provision of dwelling houses where residential development of 10 or more units; or where the development is to be carried out on a site having an area of 0.5 hectares or more and the number of units is not known;*
- *The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or,*
- *Development carried out on a site having an area of 1 hectare or more.*

13.3.2 As detailed on the RBC planning application validation checklist, all applications for major development need to be accompanied by details of the SuDS proposals to manage surface water runoff from the development, including:

- *"Detailed designs for the drainage system including (components, levels, volumes of storage).*
- *Infiltration tests of the existing ground.*
- *Design calculations to show that the runoff from the site post development is no greater than the existing runoff from the site for a 1 in 100 year, 6 hour rainfall event, that no flooding occurs anywhere on site for a 1*

in 30 year rainfall event and no flooding occurs in any building (including basement) or any utility plant susceptible to water during a 1 in 100 year rainfall event.

- *Connection details to existing watercourse and drainage networks if infiltration methods are not used together with acceptance of these connections from the relevant approving body (EA, LFA, Canal and River trust, Sewage undertaker)."*

2.2.3 Preliminary Flood Risk Assessment

RBC is defined as the LLFA under the Flood and Water Management Act 2010. The first element of the Flood Risk Regulations (2015) is for LLFAs to produce a PFRA providing a high-level overview of flood risk from all sources within a local area, including consideration of surface water, groundwater and ordinary (minor) watercourses. RBC have published a 2011 PFRA which has been reviewed to ascertain any details of flood risk at the Site, this has been reported in [Section 4](#).

2.2.4 Local Flood Risk Management Strategy

RBC produced a Local Flood Risk Management Strategy in 2015 in accordance with the Flood and Water Management Act 2010 and this document has been used to assess flood risk to the site in [Section 4](#).

2.3 Climate Change

The NPPF and PPG place emphasis on the need to fully consider – and design for – the impacts of climate change as set out in the planning guidance. This guidance provides contingency allowances for potential increases due to climate change in:

- Peak river flow;
- Rainfall intensity;
- Sea level rise.

These elements are discussed in turn below.

2.3.1 Peak River Flow

The peak river flow allowances provide a range of allowances based on percentile (i.e., the degree of certainty of an event occurring, based on the range of climate change scenarios assessed through scientific investigations). The applicable values for a site are dependent on the 'River Management Catchment' in which the site is located, which can be confirmed via the online mapping tool embedded within the guidance.

The peak river flow allowances provide a range of scenarios based on percentile (i.e., the degree of certainty of an event occurring, based on the range of climate change scenarios assessed through scientific investigations). The provided allowances are subject to the sub-catchments of river basin district (known as management catchments) and the vulnerability classification of the proposed use of the site.

The Central allowance is identified as the design standard for most forms of proposed development in all appropriate Flood Zones (the exception being 'Essential Infrastructure' which requires the 'Higher Central' value).

The conditions at the Site and consequent peak river flow allowances to be considered as part of the FRA are as detailed in [Table 2-1](#).

Table 2-1: Climate Change – Peak River Flow Allowances

River Management Catchment	Flood Risk Vulnerability Classification	Applicable Climate Change Allowance (2080s Epoch – 2070-2115)	
		Central	Higher Central
River Thames (Thames and South Chilterns Management Catchment)	More Vulnerable	+21%	+35%

The assessment of the impact of climate change on peak river flow allowances, and therefore fluvial flood risk has been detailed in [Section 4](#).

2.3.2 Peak Rainfall

The EA climate change allowances guidance was updated in May 2022 to include a GIS based 'peak rainfall allowances' map showing the anticipated changes in rainfall intensity based on river management catchment. The anticipated changes in peak rainfall intensity in small catchments (less than 5km²), or urbanised drainage catchments are summarised in [Table 2-2](#). For large rural drainage catchments the peak river flow allowances are applied.

Table 2-2: Climate Change – Peak Rainfall Intensity Allowances

Thames and South Chilterns Management Catchment peak rainfall allowances	Total potential change anticipated (2070s epoch – i.e. 2061 to 2125)	
	Central	Upper End
3.3% AP (1 in 30-year) rainfall	25%	35%
1% AP (1 in 100-year) rainfall	25%	40%

The guidance specifies that for developments with a lifetime of between 2061 to 2125 (i.e., conventional residential development, assuming a 100-year design life) the 2070s epoch is to be applied for design purposes. Therefore a +40% climate change allowance will be assessed within the surface water drainage strategy discussed in [Section 6](#).

2.3.3 Sea Level Rise

The Site is not located near to the coast or a tidally dominated watercourse, so sea level rise is not of concern to the Site.

3 Site Setting

3.1 Site Description

The site is located on the east side of Greyfriars Road, on the corner with Garrard Street, Reading, Berkshire (OS grid reference: 471, 275m E, 173, 680m N) **Figure 3-1** shows the Site location.

Figure 3-1: Site Location



The existing site features an eight-story office building, which includes a basement level. A substantial portion of the ground and basement floors is allocated for vehicle and bicycle parking, with access available from Garrard Street. The building's reception area is situated in the north-western corner of the ground floor, accessible from both Greyfriars Road and Garrard Street. Office and meeting facilities are located on the first through sixth floors. Additionally, there is an alternative pedestrian access point from the first floor to Greyfriars Road, located at the south-western corner of the site.

3.2 Topography

Topographic survey by Arena Property Services Limited "A1-23134-13-B-T0574" took place in March 2024 which provides level data to OS GPS datum. A copy of the topographical survey is included in **Appendix B**.

The ground levels surrounding the site are 38.70mAOD in Garrard Street, rising gradually to the east. Ground levels rise steeply south along Greyfriars Road (west) and 39.84mAOD from a minimum of 38.82m AOD in the north-west corner.

3.3 Hydrological Setting

The River Thames is the primary watercourse in the vicinity, flowing east to west and located approximately 600

meters to the northeast of the site. The water levels of the River Thames at this location are regulated for navigation purposes by the Caversham Lock and Weir Complex, situated approximately 800 meters to the northeast. The Standard Head Water Level (SWHL) for this section of the River Thames is recorded at 36.585 meters Above Ordnance Datum (AOD). The River Kennet/Kennet and Avon Canal flows west to east approximately 550m south of the site. The site is in Flood Zone 1 which is discussed further in [Section 4](#) and is not currently protected by formal defences and no flood alleviation works are planned for the area.

3.4 Geology

The British Geological Society (BGS) online geology viewer provides the following information on the geology of the site.

- Bedrock: 'Seaford Chalk Formation And Newhaven Chalk Formation - Chalk'
- Superficial Deposits: 'Taplow Gravel Formation - Sand And Gravel.'

It has not been possible to carry out recent a Ground Investigation as the site is currently tenanted, therefore a Ground Investigation is due to take place during the next design stage A historic 1981 Soil Mechanics Report has been reviewed and the findings are in-line with the BGS online geology viewer.

3.5 Existing Drainage Arrangements

A CCTV drainage survey has taken place and confirms that the surface water drains to the sewer via a pumped connection to the Thames Water sewer under Garrard Street and the foul water drains via a gravity connection to the Thames Water sewer under Greyfriars Road. The CCTV drainage survey is shown in [Appendix B](#). There is a separate Thames Water surface water sewer and Thames Water foul water sewer running under both Garrard Steet and Greyfriars Road. The surface water sewer under Garrard Steet is 375mmØ flowing west to east and 300mmØ under Greyfriars Road flowing south to north. The foul water sewer is 150mmØ under Garrard Steet flowing east to west and 225mmØ under Greyfriars Road flowing south to north.

4 Assessment of Flood Risk

The assessment of flood risk has been undertaken based on the sources of information, listed in [Section 1.3](#).

4.1 Fluvial (River)

The first phase in identifying whether a site is potentially at risk of fluvial flooding is to consult the EA's Flood Zone maps, available on the EA's website. This provides an initial indication of the extent of the Flood Zones, which is refined using more detailed site-specific level survey and modelled flood levels.

The Flood Zones are defined in Table 1 of the PPG 'Flood Risk and Coastal Change' section as follows:

- **Flood Zone 1 'Low Probability'** – Land at less than 1 in 1000 (0.1%) Annual Probability (AP) of river or sea flooding;
- **Flood Zone 2 'Medium Probability'** – Land between 1 in 100 (1%) and 1 in 1000 (0.1%) AP of river flooding, or between 1 in 200 (0.5%) and 1 in 1000 (0.1%) AP of sea flooding;
- **Flood Zone 3 'High Probability'** – Land at 1 in 100 (1%) or greater AP of river flooding, or 1 in 200 (0.5%) or greater AP of sea (tidal) flooding;

The EA Flood Zone Map ([Figure 4-1](#)) and the online EA Flood Map for Planning indicates that the Site is located entirely within Flood Zone 1. The Site is located approximately 600m southeast of the River Thames.

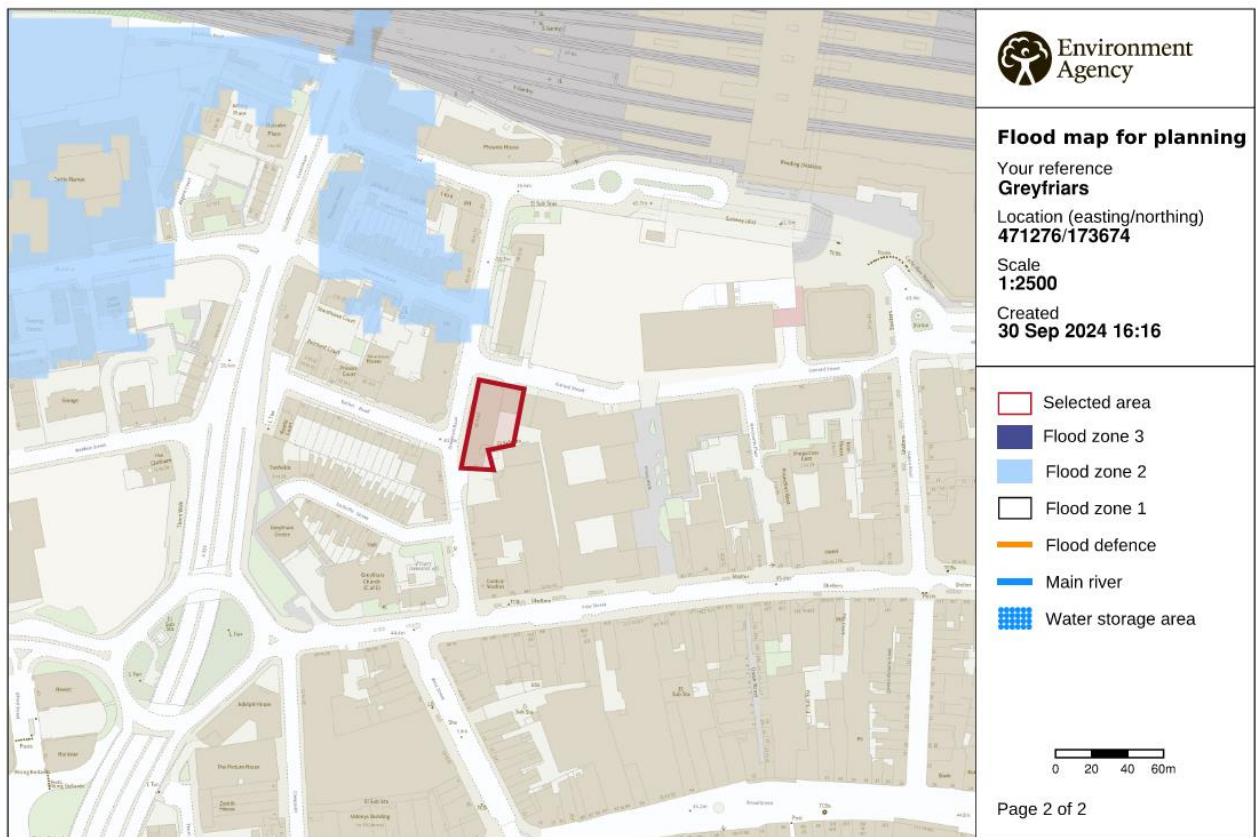


Figure 4-1: EA Flood Zone Map

The RBC SFRA contains mapping showing EA Recorded Flood Outlines (2017) which confirms no recorded incidents of fluvial flooding to the Site.

The risk of fluvial flooding to the Site is therefore considered to be **low**.

4.2 Tidal

The EA Flood Map for Planning details the natural floodplain for areas at risk from river and (sea) tidal flooding.

The Site is located at a sufficient distance away from the tidal river Thames and the sea that tidal flooding is of **no risk** to the Site.

4.3 Surface Water

The EA's Risk of Flooding from Surface Water mapping identifies areas that could be susceptible to surface water flooding in various rainfall events. The latest mapping assesses flooding resulting from severe rainfall events based on the following three scenarios:

- 'High' Risk: 1 in 30 (3.3%) or greater AP rainfall event;
- 'Medium' Risk: Between a 1 in 100 (1%) and 1 in 30 (3.3%) AP rainfall event;
- 'Low' Risk: Between 1 in 1000 (0.1%) and 1 in 100 (1%) AP rainfall event;
- 'Very Low' Risk: Lower than 1 in 1000 (0.1%) AP rainfall event.

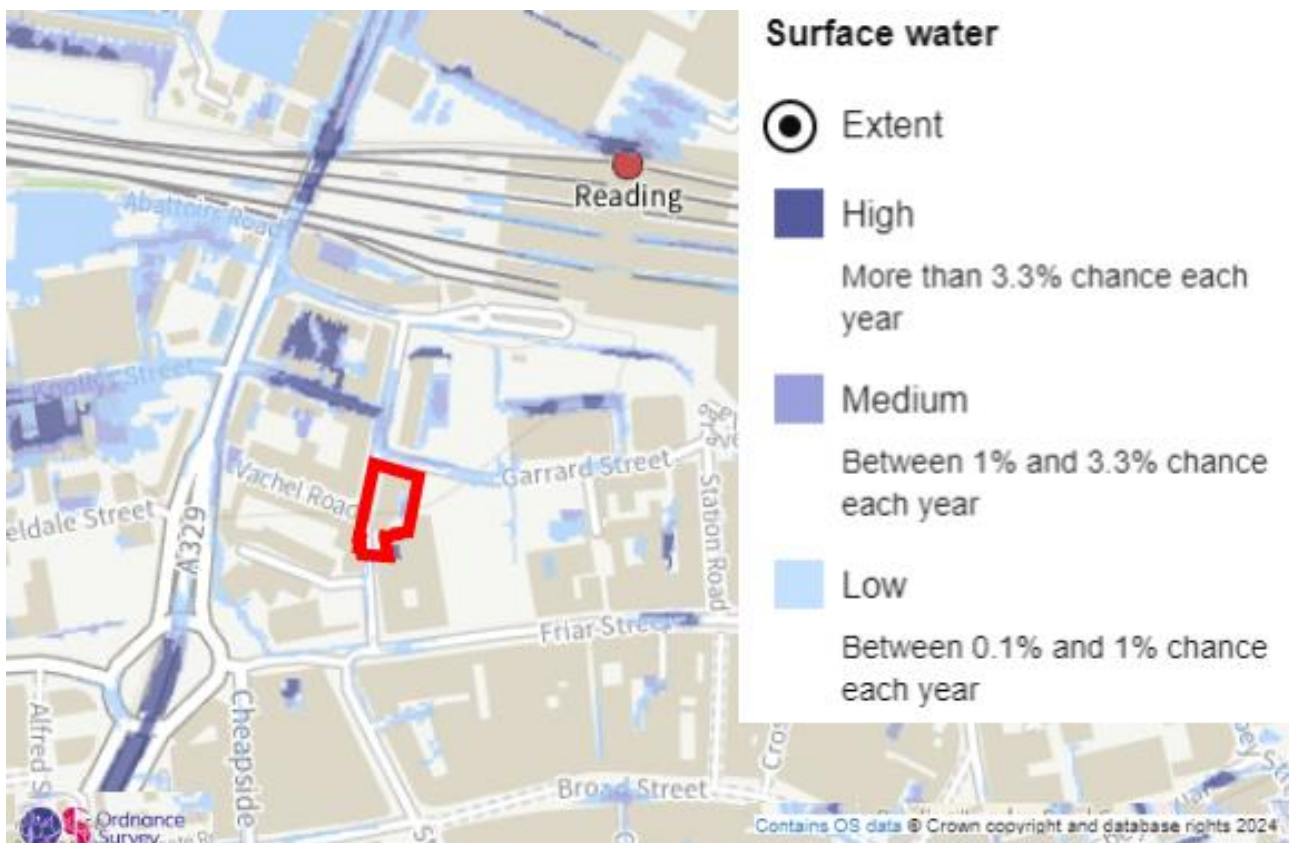


Figure 4-2: Surface water flood map

EA mapping shows that the majority of the Site is predominantly at a 'Very Low', and 'Low' risk of surface water flooding, see **Figure 4.2**

The EA mapping also shows small areas of the Site are also shown to be at a 'Medium' or 'High' risk. These areas are small and located towards the edges of the Site where there are depressions in the existing topography.

The main area of surface water flood risk is shown to be along on the eastern boundary of the Site. The Site falls from north-west to south-east, and therefore surface water runs towards the eastern boundary, where water may be stored within the depressions referenced. This area is predominantly at a 'Low' risk of surface water flooding, however there is a small, isolated area to the south that is shown to be at a 'Medium' risk.

Overall, the surface water flood risk is medium.

4.4 Groundwater

The Soil Mechanics report that was conducted for the existing building in 1981 notes that the groundwater levels recorded during the works indicate that the existing level is approximately 1.0m below the existing ground level. Groundwater monitoring is proposed in the scheduled ground investigation works. The available BGS available BGS and private borehole records in the vicinity of the Site have been reviewed and determined they are too outdated to be used to assess the risk of groundwater flooding to the Site.

The SFRA provides historic flood records for the local area and there has been no records of groundwater flooding for the site.

The risk of groundwater flooding is therefore considered to be low.

4.5 Reservoir

The EA provides maps showing the risk of flooding in the event of a reservoir failure. The reservoir breach extents

Figure 4-3 below provides an extract of the EA's Long Term Flood Risk mapping for flood risk from reservoirs. This shows the risk of flooding in the event of a breach from reservoirs containing 25,000m³ (or above) of water.

The EA mapping shows there is flooding at the site when there is also flooding from rivers. The risk of flooding from rivers has been assessed to be low in [section 4.1](#) and as the risk from reservoir flooding is only present when there is also flooding from rivers, the risk of flooding from reservoirs has been assessed to be low.

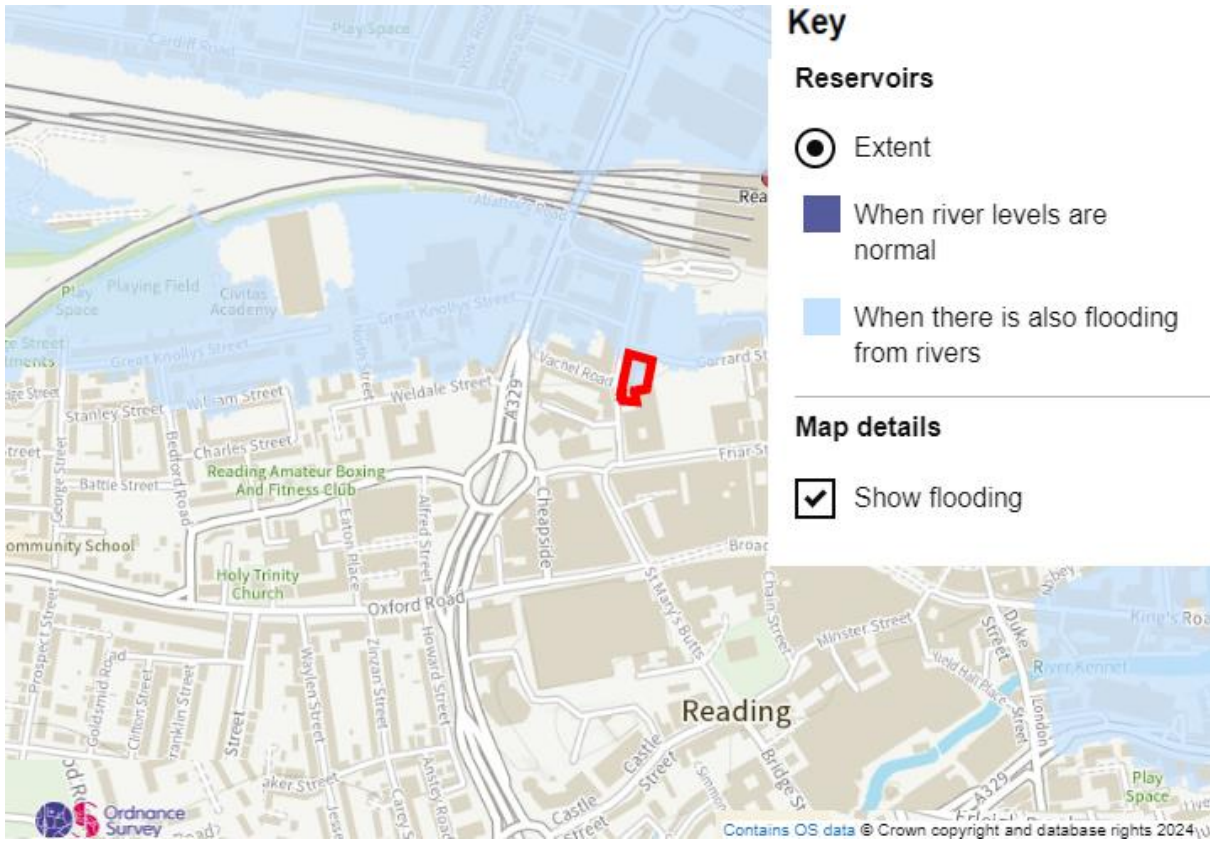


Figure 4-3: EA Risk of Flooding from Reservoirs

4.6 Sewer Flooding

Thames Water sewers are typically designed to accommodate up to a 1 in 30 (3.3%) AP rainfall event without surcharging above ground level.

Thames Water asset location plans have been obtained and the area in the immediate vicinity of the site is served by separate foul water and surface water sewers. The sewer flooding history for the site has also been obtained from Thames Water ([Appendix C](#)) which confirms there have been no previous occurrences of sewer flooding at the Site.

Therefore, the risk of sewer flooding is assessed to be low.

4.7 Other Sources

Current guidance and policy outlines that all sources of flood risk should be considered, including flooding from water supplies and other water retaining infrastructures. There are no other water retaining infrastructures in the vicinity of the site. The water supply for the area is provided by Thames Water

The Site is not located near to any canals or other bodies of water.

It has been considered that there are no other known sources that would pose a flood risk to the Site.

4.8 Summary of Flood Risk

Source of Flooding	Flood Risk Impact	Comment/Justification	Mitigation requirements for new development
Fluvial		The Site is sufficiently far away such that it is not affected by a flood of the River Thames. The EA Flood Map for Planning confirms that the Site is located entirely within Flood Zone 1.	n/a
Tidal		The EA Flood Map for Planning confirms that the Site is located entirely within Flood Zone 1.	n/a
Surface Water/ Pluvial		EA mapping shows that most of the Site is predicted to be at a 'Very Low', and 'Low' risk of surface water flooding. Some areas of the Site are also shown to be at a 'Medium' or 'High' risk, however, these areas are very small and all located at the edges of the Site boundaries.	Implementation of an effective surface water drainage strategy to manage surface water runoff up to and including the 1 in 100 (1%) AP rainfall event including a 40% climate change allowance. The surface water drainage strategy will restrict runoff to 89% of the current site conditions.
Groundwater		SFRA mapping confirms that the Site has a low probability for groundwater flooding to occur. A historic ground investigation has been completed in 1981 and encountered groundwater at depths of 1m bgl. The SFRA shows that no incidences of groundwater flooding have been recorded within the Site extents.	Permeable paving and below ground surface water attenuation tanks will be lined with an impermeable membrane to prevent the ingress of ground water. Ground levels will be designed to fall away from building thresholds.
Artificial Sources		The EA Flood Risk from Reservoirs mapping shows that there is only a risk flooding from reservoir breaches when there is also flooding from rivers.	Ground levels will be designed to fall away from building thresholds.
Sewers and Water Mains		TWUL data confirms that sewer flooding incidents have been recorded within the postcode area that the Site is located within.	The surface water drainage strategy will restrict discharge from the Site to existing sewers to greenfield rates.
Key:		Low/Negligible Risk – No noticeable impact to or from the Site and not considered to be a constraint to development	
		Medium Risk – Issue requires consideration but not a significant constraint to development	
		High Risk – Major constraint to development requiring active consideration in mitigation proposals	

Table 4-1: Summary of Sources of Flood Risk

5 Flood Mitigation Strategy and Sequential Test

5.1 NPPF Sequential Test

The NPPF Annex 3 confirms the '*Flood risk vulnerability classification*' of a site, depending upon the proposed usage. This classification is subsequently applied to PPG 'Flood Risk and Coastal Change' Table 2 to determine whether:

- The proposed development is suitable for the flood zone in which it is located, and
- Whether an Exception Test is required for the proposed development.

The proposed residential development is classed as 'more vulnerable' development. For the purposes of this assessment and in line with the approach advocated in PPG, the proposed development has been assessed as 'more vulnerable'.

The NPPF follows a sequential risk-based approach in determining the suitability of land for development in flood risk areas, with the intention of steering all new development to the lowest flood risk areas.

The location of the proposed 'more vulnerable' development is in Flood Zone 1 and predominantly within an area at low flood risk from other sources. The EA Risk of Surface Water mapping indicates that there are areas of medium and high risk of surface water flood risk to the west of the Site. The areas of flooding are within depressions on the Site. As such, the risk associated with this would be addressed through the Surface Water Drainage Strategy (see [Section 6](#)), so that the post development scenario would not include such flood risk areas. As such the development is considered suitable to develop in this area and therefore the Sequential Test is considered to be passed.

5.2 Building Design

5.2.1 Finished Floor Levels

The Site is located wholly within EA Flood Zone 1 and has no major sources of fluvial and tidal flood risk.

Proposed finished floor levels have been designed to be above the adjacent existing site boundary levels. The external ground levels have been designed to fall away from the buildings to mitigate the residual flood risk associated with excess surface water runoff in an extreme rainfall event.

5.2.2 Safe Access and Egress

The Site is at a low risk of fluvial flooding and a below ground basement is not proposed and so no mitigation measures are required for Safe Access and Egress.

5.3 Surface Water Drainage

The proposed surface water drainage strategy will restrict Site runoff to less than existing rates for all rainfall events up to and including the 1 in 100 (1%) AP plus 40% climate change allowance with aiming to be as close to greenfield rates as possible per policy EN18 "*should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site.*". This will provide a significant reduction in runoff compared to existing runoff rates. Surface water runoff will be managed via Sustainable Drainage Systems (SuDS), this is further discussed in [Section 6](#).

6 Surface Water Drainage Strategy

6.1 Overview

The Lead Local Flood Authority (LLFA) is the statutory consultee on planning applications for surface water management. As the LLFA, RBC is therefore responsible for the approval of surface water drainage systems within new major development. Major development consists of any of the following:

- a) the provision of dwelling houses where residential development of 10 or more units; or where the development is to be carried out on a Site having an area of 0.5 hectares or more and the number of units is not known
- b) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more: or
- c) development carried out on a Site having an area of 1 hectare or more.

The following section provides an overview of the existing surface water drainage arrangements and the proposed strategy for the management of surface water from the new development.

This section is supported by the following information:

- Topographic survey by Arena Property Services Limited “A1-23134-13-B-T0574” dated March 2024 and Thames Water Asset Records dated October 2024
- Thames Water Pre-Planning Enquiry
- Form Drawing [Appendix E]:
 - Drainage Strategy – “233968-FSD-XX-XX-DR-C-9201”
- Drainage Calculations [Appendix F]

6.2 Planning Policy Requirements

The NPPF recognises that flood risk and other environmental damage can be managed by minimising changes in the volume and rate of surface runoff from development Sites and recommends that priority is given to the use of Sustainable Drainage Systems (SuDS) in new development, this being complementary to the control of development within the floodplain.

As the intention of SuDS is to mimic the natural drainage regime of the undeveloped Site, the NPPF PPG states the following (consistent with the Building Regulations H3 hierarchy):

“...the aim should be to discharge surface water runoff as high up the following hierarchy of drainage options as reasonably practicable:

- into the ground (infiltration),*
- to a surface water body,*
- to a surface water sewer, highway drain or another drainage system,*
- to a combined sewer”*

The surface water drainage strategy has been developed in line with industry best practice, paragraph 13.2 of the SFRA and Local Plan Policy EN18:

13.2 Suitability of SuDS Measure

As the intention of SuDS is to mimic the natural drainage regime of the undeveloped site, the NPPF PPG states the following (consistent with the Building Regulations H3 hierarchy):

...the aim should be to discharge surface water runoff as high up the following hierarchy of drainage options as reasonably practicable:

- *Into the ground(infiltration),*
- *to a surface water body, -to a surface water sewer ,highway drain or another drainage system,*
- *to a combined sewer*

EN18:

All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS.

6.3 Design Principles

The drainage strategy proposes SuDS features including, below-ground attenuation crates/tank and permeable paving. These features have been designed based on the standards, regulations and guidance listed below to satisfy the design criteria also listed below.

The surface water drainage strategy has been developed based on the following relevant standards, regulations and guidance:

- Local Plan Policy EN18 Flooding and Drainage;
- Building Regulations Part H, 2015
- The CIRIA SuDS Manual
- UK Water's Design and Construction Guide ("the Code") for adoptable sewerage systems (formerly Sewers for Adoption)

The surface water drainage strategy has been developed based on the following key design criteria:

- The Site surface water strategy will consider the 1 in 100 (1%) AP rainfall event plus 40% climate change allowance.
- There will be no flooding for the 1 in 100 (1%) AP rainfall event plus 40% climate change as well as 1 in 30 year event.
- Peak runoff rates limited to as close to greenfield run off rates, as required by RBC.

- Surface water flooding in the form of temporary shallow ponding is not permitted in controlled and designated locations in events exceeding the 1 in 100 (1%) AP event. The volume of water which can be safely stored at surface level is dependent on the detailed levels design.
- No flooding of property up to the 1 in 100 (1%) AP plus climate change event.
- To provide safe exceedance routes in events which exceed the critical 1 in 100 (1%) AP rainfall event plus 40% climate change allowance.

6.3.1 Method of Surface Water Discharge

The most appropriate method of surface water discharge has been determined based on the hierarchy of surface water disposal discussed below and summarised below.

6.3.2 Consideration of Infiltration Drainage

The site is spatially constrained as located in the urban vicinity of Reading. The historic ground investigation found groundwater at depths as close 1 m to ground level and the constrained urban setting means that infiltration would not be suitable for the site.

Technical guidance offered by NHBC as well as good industry practises stipulate that soakaways should be a minimum of 5m away from a building and public highway. Given the constraints of this site it is not possible to achieve this and therefore infiltration has been discounted.

6.3.3 Consideration of Discharge to Watercourse

There are no watercourses located within the immediate vicinity of the Site.

6.3.4 Consideration of Discharge to Sewer

Thames Water asset records show that there are separate surface water and foul water sewers running under Garrard Street. It is proposed to discharge surface water at a restricted rate into this surface water sewer and foul water from the site to the foul water sewer. It is currently proposed that new connections to the Thames Water sewers will be formed.

6.3.5 Drainage Catchments

The site of 1175m² (0.1175Ha) and is assumed to be 100% impervious as permeable paving will be lined.

Table 6-1: Breakdown of Total Impermeable and Permeable Areas

	Drainage Catchment Area (ha)	Permeable Area (ha)	Impermeable Area (ha)
Existing Development	0.1175	0	0.1175
Proposed Development	0.1175	0	0.1175

6.3.6 Pre-Development Discharge Rates

It is assumed that the existing site has the capacity to discharge a 1:10 year rainfall event without causing localised flooding.

FSR rainfall data has been interpreted for the site to set the rainfall intensity for the site for a 1:10 year rainfall event to be 56.3mm/hr (1:10 year, 0% CC, 15 minute intensity).

The existing discharge rate from the site can be calculated using the Modified Rational Method:

$$Q = 2.71 i A$$

$$Q = 2.71 \times 36 \times 0.1175$$

$$Q = 17.9 \text{ l/s}$$

6.3.7 Post Development Discharge Rate & Attenuation

The proposed drainage strategy has been designed with a discharge rate “as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event” in line with DEFRA Non-statutory guidance for sustainable drainage systems per Policy EN18. The greenfield run-off rate for the site has been calculated using IH124 method. The results are presented below:

Catchment area (Ha)	Greenfield Runoff Rates (l/s)			
	1 in 1 AP	QBAR	1 in 30 AP	1 in 100 AP
0.1175	0.02	0.02	0.04	0.06

Limiting flows to this low level is impractical because the required orifice size would be very small in diameter, making it highly susceptible to blockages. There is industry guidance which sets the minimum recommended orifice size for a flow-control, Design and Construction Guidance, (Sewerage Sector Guidance, Appendix C) states that the minimum size for an orifice is 50mm and the CiRIA SuDS Manual (C753) states that the minimum orifice size is 75mm or smaller if it is private. Using this information, the proposed discharge rate from the site is 2l/s which is a reduction of 89% and complies with policy EN 18 “*should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site.*”

Proposed discharge rate from the site: **2l/s**.

An Infodrainage model has been used to model the proposed drainage network, and 101.1m³ of surface water attenuation is proposed through the provision permeable paving and below-ground attenuation crates/tank. Refer to [Appendix E](#) for simulation results.

Surface water that lands on the roof of the building will be routed to the below-ground drainage network through a building drainage system designed by the MEP engineer. Surface water that lands on the hardstanding of the site will be captured by the permeable surfacing before passing through to the sub-base where it will be temporarily attenuated and stored before entering the below-ground drainage network. Surface water will then be attenuated in the below-ground drainage tank before being pumped at 2l/s to a manhole on the site boundary before discharging via gravity to the Thames Water sewer under Garrard Street via a new proposed connection. Pumping has been selected due to level constraints at this site resulting in the invert level of the below-ground attenuation tank being lower than the receiving Thames Water sewers adjacent to the site.

6.3.8 Surface Water Outfall

The proposed connection point is a new saddle connection to the existing 375mmØ surface water sewer under Garrard Street. The surface water drainage from the site will be pumped to a new manhole before discharging via gravity to the Thames Water sewer under Garrard Street via a new proposed connection due to level constraints at the site necessitating a pumped solution.

A Pre-Planning enquiry has been submitted to Thames Water to confirm capacity in the receiving sewer and they have confirmed there is sufficient capacity in their network to receive the proposed flows from the development. Their response is shown in Appendix C.

6.4 Designing for Exceedance

The piped system has been designed to accommodate runoff during rainfall events up to at least the 1 in 100 (1%) AP event plus 40% climate change allowance. In excess of this it is possible that the design standard for the system will be exceeded.

To ensure that in an exceedance event any flooding does not affect properties or discharge from the development, flows up to the 1 in 100 (1%) AP plus 40% climate change event will be managed on Site. Site levels have been designed to direct flows away from the buildings and towards areas such as open space where temporarily shallow flooding can occur safely.

Overland flow routes have been reviewed for events which exceed the 1% AP storm event plus 40% climate change event design capacity. The proposed finished levels have been designed with sympathy to the proposed layout and in conjunction with the proposed drainage strategy such that exceedance routes do not result in building flooding or safety issues.

6.5 Sustainable Drainage Systems (SuDS)

CIRIA report C753 'The SuDS Manual' outlines the various types of SuDS, their benefits and limitations, and design considerations associated with each. Not all SuDS components/methods are feasible or appropriate for all developments. Factors such as available space, ground conditions and Site gradient will influence the feasibility of different methods for a particular development.

The following SuDS features are proposed for the development:

- Below-ground attenuation tank/crate
- Permeable and porous paving (lined to prevent infiltration)

The proposed SuDS seek to deliver long term mitigation by attenuating and treating surface water runoff generated by the proposed development.

6.6 Other Considerations

6.6.1 SuDS & Water Quality

It is proposed to make use of Sustainable Drainage Systems (SuDS) to retain and limit surface water runoff from the development to comply with Policy EN18.

- Porous paving materials will improve water quality and reduce the volume of surface water runoff.
- Below-ground attenuation tank/crates will be used to temporarily store and attenuate surface water allowing for a reduced discharge rate from the site
- Discharge is proposed to be limited to 2.0 l/s/ha for all rainfall events up to and including the 1 in 100 (1%) AP plus 40% climate change allowance event.

Appropriate pollution control measures have been included in the surface water drainage strategy to minimise the risk of contamination or pollution entering the receiving systems as a result of surface water runoff from the development.

SuDS features have been developed based on an appraisal of the pollution hazard indices for the Site. Suitable SuDS treatment components are included to reduce the levels of pollutants based on the simple index approach outlined in CIRIA's SuDS Manual.

The following hazard indices are adopted for a residential development (very low hazard level) and low traffic roads (medium hazard level). Note, the below table is only relevant to roof and road catchments. There are no defined hazard indices for external hard/soft landscaped areas. However, these areas have been designed to intercept and treat runoff at source via porous surfacing and directing runoff towards rain gardens and soft landscaped areas.

SuDS pollution mitigation indices for each SuDS component and associated catchment are shown in the table below.

Table 6-2: SuDS Mitigation indices (Table 26.3 of The SuDS Manual)

Roof & External Catchment			
SuDS Component	Mitigation Indices		
	Total Suspended Solids (TSS)	Metals	Hydrocarbons
Permeable Paving	0.7	0.6	0.7

Based on the above, the total pollution mitigation index of the proposed SuDS components exceeds the pollution hazard index for the Site and therefore the SuDS features deliver adequate treatment of surface water runoff from the development.

6.6.2 Adoption and Management

It may be possible for some SuDS features to be adopted by the LLFA or Highways Authority. The ongoing management and maintenance of the proposed surface water management systems will otherwise be expected to fall under the responsibility of the relevant Site management company.

Long term management of surface water drainage assets, including any SuDS components, is essential to ensure they continue to function to their design standard. As such, a management and maintenance plan will need to be developed in order to ensure the systems continue to work effectively.

A SuDS maintenance schedule is included in [Appendix G](#).

7 Foul Water Drainage Strategy

A gravity foul water drainage network is proposed to serve the development with one new connection into Thames Water sewer under Garrard Street.

Refer to Form drawing 233968-FSD-XX-XX-DR-C-9201 in [Appendix E](#) for the proposed foul water drainage strategy drawing.

The existing drainage arrangements are discussed in [Section 3.5](#).

7.1 Proposed Foul Water Drainage Strategy

The foul water generated from the building will be routed internally to the below-ground drainage network. The below-ground drainage network will discharge at an uncontrolled rate via a gravity connection via a new saddle connection to the existing foul water sewer is 150mmØ under Garrard Steet.

7.1.1 Proposed Peak Foul Flow

The MEP engineer for the project has calculated the peak foul flow rates for the development as **15.57l/s**.

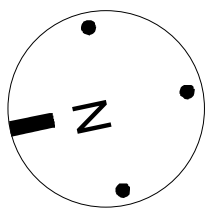
7.1.2 Existing Public Sewer Network Capacity

A Pre-Planning enquiry has been submitted to Thames Water to confirm capacity in the receiving sewer and they have confirmed there is sufficient capacity in their network to receive the proposed flows from the development. Their response is shown in Appendix C.

7.2 Foul Drainage Diversions

Based on asset record and survey information received, no foul water drainage diversions are expected to be required.

Appendix A – Proposed development plans



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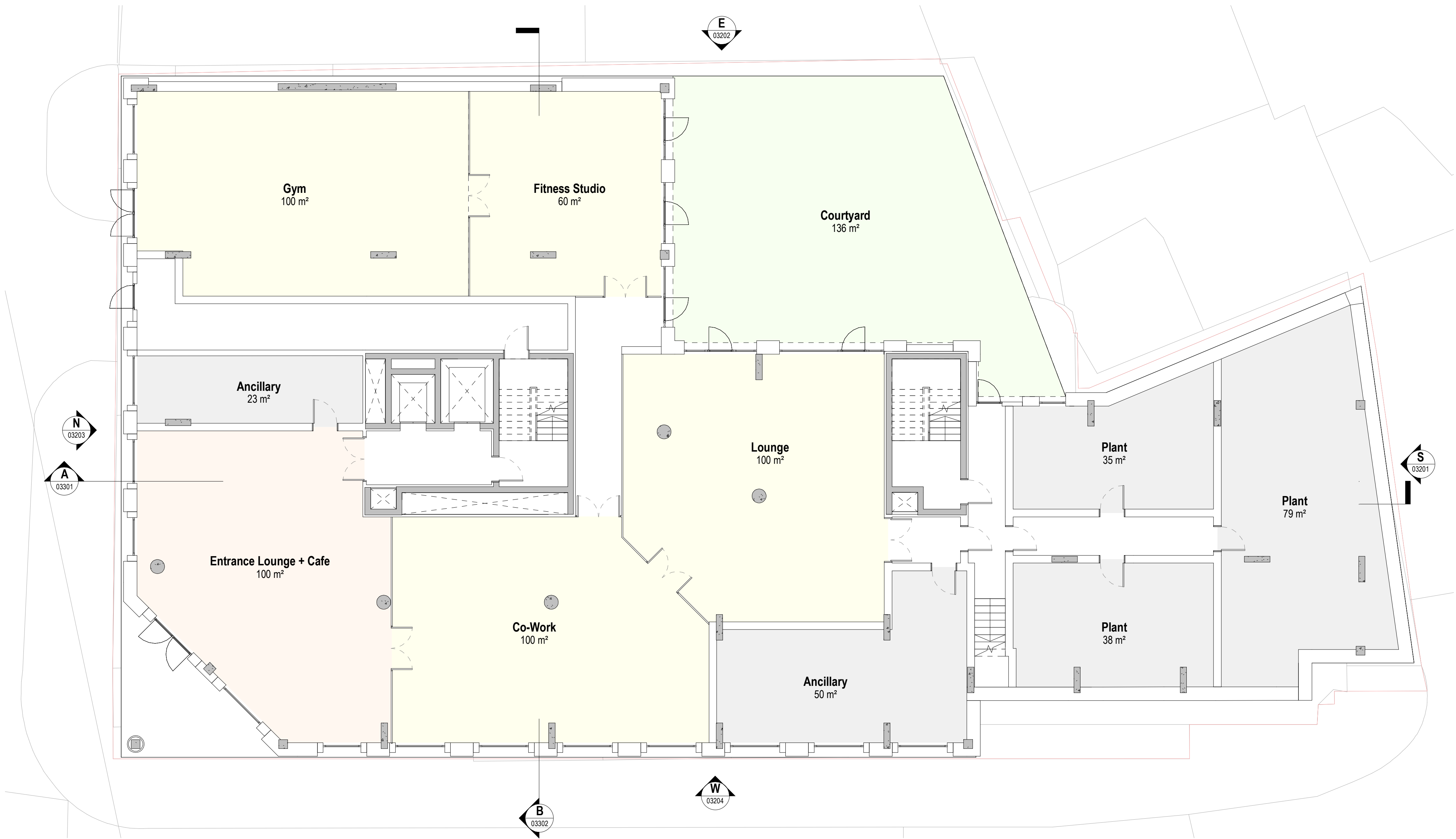
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03-Proposed
Ground Floor Plan

PROJECT

20-30 Greyfriars

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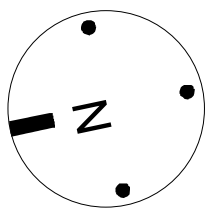
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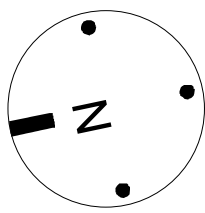
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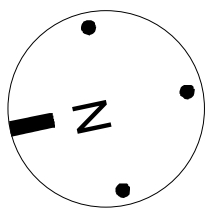
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Third Floor Plan

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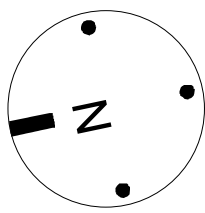
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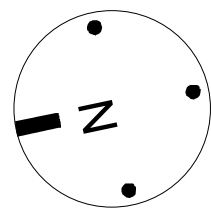
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P = Preliminary C = Contractual



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DRAWING STATUS

Draft

TITLE
03-Proposed
Fifth Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1:
1 : 100

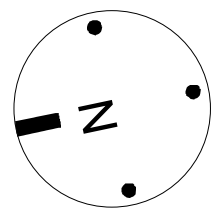
SCALE AT A3:
1 : 200

DAA JOB NO.
23022

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TITLE
03-Proposed
Sixth Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1:
1 : 100

SCALE AT A3:
1 : 200

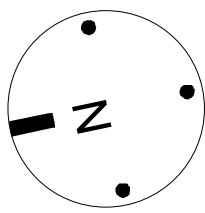
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23022

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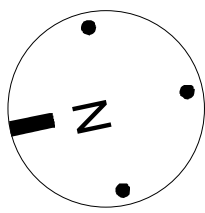
TITLE
03-Proposed
Seventh Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1:	SCALE AT A3:	DAA JOB NO.
1 : 100	1 : 200	23022

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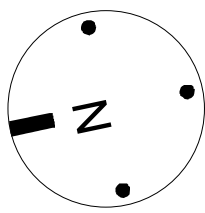
TITLE
03-Proposed
Eighth Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1: 1 : 100
SCALE AT A3: 1 : 200
DAA JOB NO. **23022**

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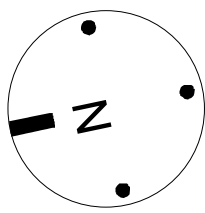
TITLE
03-Proposed
Ninth Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1: 1 : 100
SCALE AT A3: 1 : 200
DAA JOB NO. **23022**

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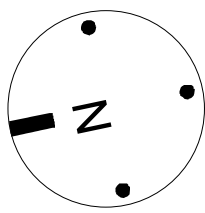
TITLE
03-Proposed
Tenth Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1: 1 : 100
SCALE AT A3: 1 : 200
DAA JOB NO. **23022**

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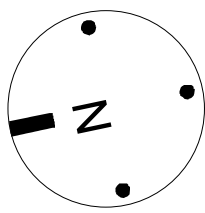
TITLE
03-Proposed
Eleventh Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1: 1 : 100
SCALE AT A3: 1 : 200
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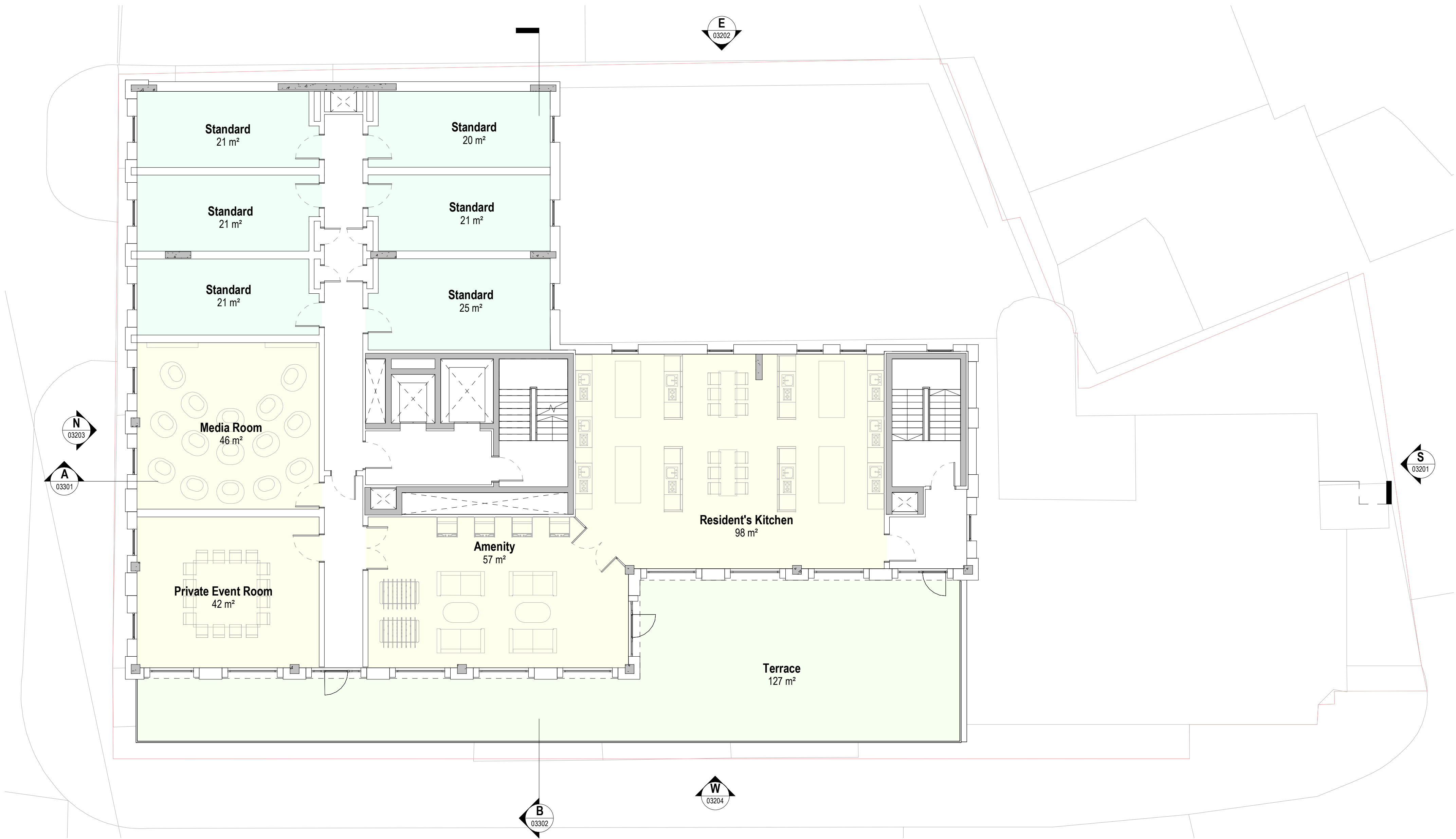
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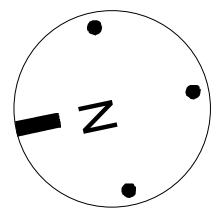
TITLE
03-Proposed
Twelfth Floor Plan

PROJECT
20-30 Greyfriars

SCALE AT A1: 1 : 100
SCALE AT A3: 1 : 200
DAA JOB NO. **23022**

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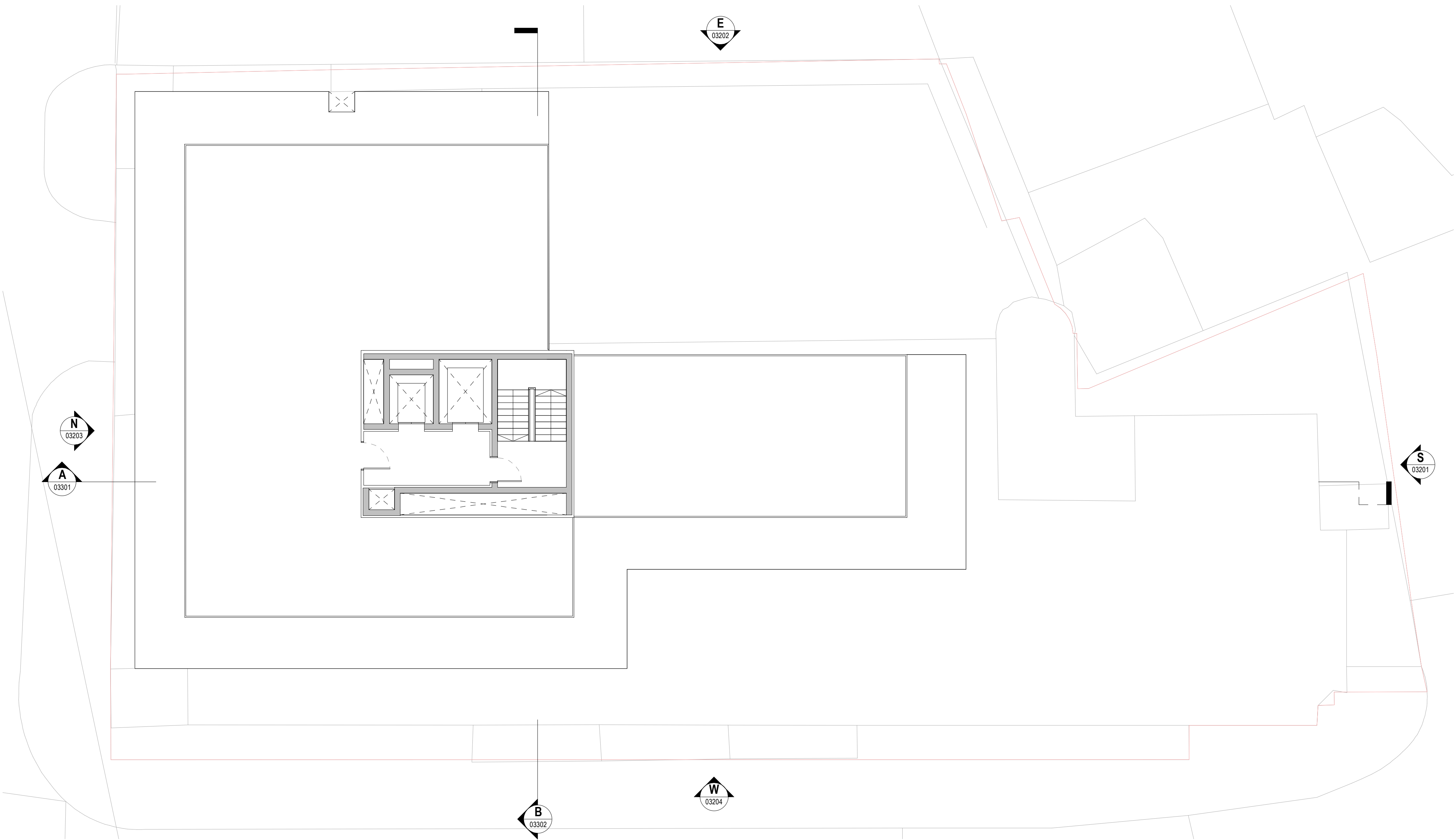
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TITLE

03-Proposed
Thirteenth Floor Plan

PROJECT

20-30 Greyfriars

SCALE AT A1:
1 : 100

SCALE AT A3:
1 : 200

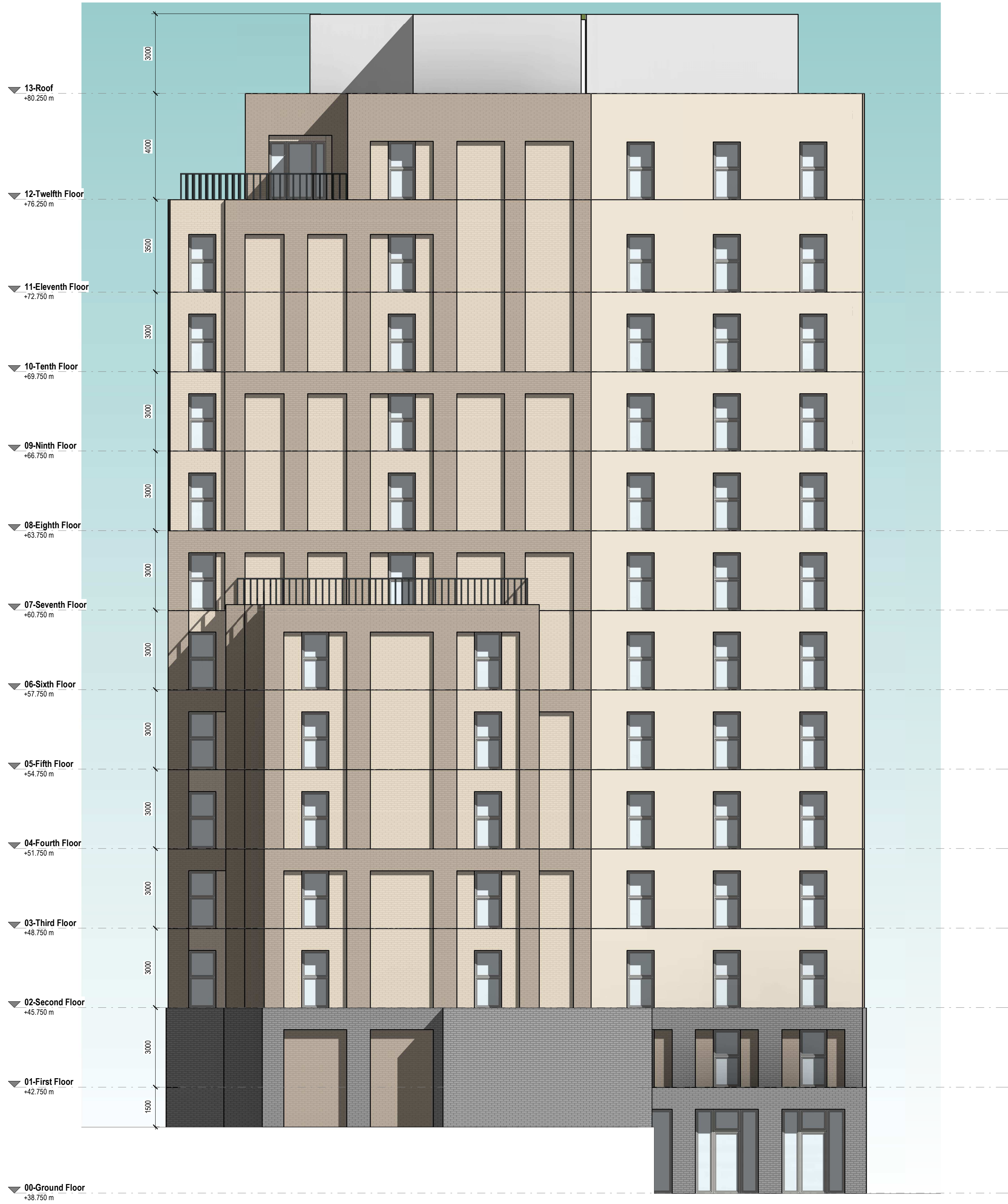
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S South Elevation
Scale 1 : 100

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TITLE
03-Proposed
South Elevation

PROJECT
20-30 Greyfriars

SCALE AT A1:
1 : 100

SCALE AT A3:
1 : 200

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23022

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TITLE
03-Proposed
East Elevation

PROJECT
20-30 Greyfriars

SCALE AT A1:
1 : 100

SCALE AT A3:
1 : 200

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DRAWING
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N North Elevation
Scale 1:100

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TITLE
03-Proposed
North Elevation

PROJECT
20-30 Greyfriars

SCALE AT A1:
1 : 100

SCALE AT A3:
1 : 200

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