

Flood Risk Assessment and Drainage Statement

Units 10-12 Rose Kiln Lane, Reading, RG2 0JJ

PL/26/1027

27 August 2026

Introduction

1. This Statement has been prepared in support of a Full Planning Application (the 'Application') for development proposals at Units 10-12 Rose Kiln Lane, Reading, RG2 0JJ (the 'Site'). The Application is submitted to the Reading Borough Council (the 'RBC') as the Local Planning Authority (the 'LPA').
2. The proposed description of development is as follows: *"Refurbishment and upgrade of the units comprising of external alterations and yard reconfiguration and all associated works"*.

Policy Review

3. Chapter 18 of the National Planning Policy Framework (**NPPF, 2026**) seeks to ensure that development is directed away from areas at highest risk of flooding wherever possible and that proposals are safe for their lifetime without increasing flood risk elsewhere. The Framework adopts a risk-based approach to the location and design of development, requiring flood risk from all sources to be taken into account. It also promotes the use of sustainable drainage systems where appropriate to the scale and nature of development.
4. The **Flood Risk and Coastal Change Planning Practice Guidance (PPG)** supports the NPPF by providing detailed guidance on the consideration of flood risk within the planning process. It confirms that flood risk assessments should be proportionate to the nature and scale of development proposed, take account of all sources of flood risk, and demonstrate that development will be safe for its lifetime without increasing flood risk elsewhere. The PPG also provides guidance on the application of the Sequential and Exception Tests. The Sequential Test seeks to steer development to areas with the lowest probability of flooding. However, the PPG confirms that certain forms of development, including minor development, are exempt from the Sequential Test. The Exception Test is not required for "less vulnerable" schemes in Flood Zone 2.
5. Reading Local Plan (2021) **Policy EN18 (Flooding and Sustainable Drainage Systems)** requires development to be directed to areas at the lowest risk of flooding and to take account of all sources of flood risk, including river, surface water, groundwater and sewer flooding. Development must not increase flood risk elsewhere, reduce floodplain storage capacity, or impede flood flows. Whilst the requirement for Sustainable Drainage Systems (SuDS) applies to major development, smaller schemes are encouraged to incorporate SuDS measures where practicable. Development should demonstrate that surface water is managed appropriately and that flood risk is not worsened either on or off site.

Assessment

6. The proposed development comprises the refurbishment and upgrade of the existing units at 10-12 Rose Kiln Lane, together with associated amendments to the yard layout to improve accessibility and site circulation. The proposals do not include any extension to the buildings or their footprints, nor will they result in an increase in the extent of hardstanding across the Site. The works are focused on improving the functionality, accessibility and operation of the existing premises.
7. In relation to the level changes specifically, these are limited to small areas of the existing yard immediately adjacent to the building entrances. At present, the yard contains a mixture of level landings and ramps serving the existing personnel and vehicle access points. In locations where there are currently no doors, the yard level generally sits slightly below the internal floor slab level. The yard also falls away from the building towards the established drainage channels and gullies within the Site. Photographs demonstrating the existing relationship between the building and surrounding hardstanding are included below. The proposed works simply involve minor localised adjustments to the existing hardstanding immediately outside new and altered personnel and shutter doors in order to provide level access for pedestrians and vehicles. These works are confined to the immediate vicinity of the entrances. They comprise minor operational alterations and will not result in any material change to the overall finished site levels. Importantly, the wider hardstanding areas and existing drainage arrangements, including the established falls towards drainage channels and gullies, will remain unchanged.
8. Whilst the Site is located within Flood Zone 2, the proposals do not constitute new built development and will not increase the building footprint, floorspace or extent of impermeable surfacing. The works are limited to minor alterations to existing hardstanding and localised level adjustments necessary to improve access arrangements. As such, the proposals will not affect flood storage capacity, alter overland flow routes, increase runoff rates, or otherwise modify the Site's existing drainage strategy. Furthermore, the application relates solely to the refurbishment and enhancement of existing industrial units and does not introduce a more vulnerable use. Given the nature and scale of the proposals, it is considered that the Sequential Test is not applicable, as the development relates solely to the minor improvement of existing premises. Similarly, the Exception Test is not required as the proposals do not introduce a more vulnerable form of development and comprise a 'Less Vulnerable' use within Flood Zone 2. Furthermore, the proposals will not increase flood risk on-site or elsewhere and can be demonstrated to be safe for their lifetime.
9. Given the limited scale and nature of the proposed works, there is no realistic prospect of the development increasing flood risk either on-site or elsewhere.
10. Accordingly, the proposed development is considered to comply with Chapter 18 of the National Planning Policy Framework (NPPF), the Flood Risk and Coastal Change Planning Practice Guidance, and Policy EN18 (Flooding and Sustainable Drainage Systems) of the Reading Borough Local Plan (2021). The proposals will not result in any increase in flood risk on-site or elsewhere, nor will they adversely affect floodplain storage capacity, flood flows, surface water drainage patterns or the operation of the existing drainage network. Having regard to the scale and nature of the proposed works, the development is considered acceptable in flood risk and drainage terms and complies with the relevant national and local planning policy requirements.

SITE PHOTOS:



PLANNING FLOOD RISK FORM

Applicant to choose one or other of the flood mitigation measures below	Applicant to provide the LPA with the supporting information detailed below as part of their FRA	Applicant to indicate their choice in the box below. Enter 'yes' or 'no'
Either Floor levels with the proposed development will be set no lower than existing levels AND flood proofing of the proposed development has been incorporated where appropriate.	Details of any flood proofing / resilience and resistance techniques to be included in accordance with 'Improving the flood performance of new dwellings' CLG 2007	YES
Or Floor levels with the extension will be set 300mm above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year. This flood level is the extent of the Flood Zones.	This must be demonstrated by a plan that shows finished floor levels relative to the known or modelled flood level. All levels should be stated in relation to Ordnance Datum.¹	