



Flood Risk Assessment

Site Address

10 Pembroke Villas
Richmond
Greater London
TW9 1QF

Date

27/09/2024

Report Status

FINAL

Grid Reference

517660, 175113

Site Area

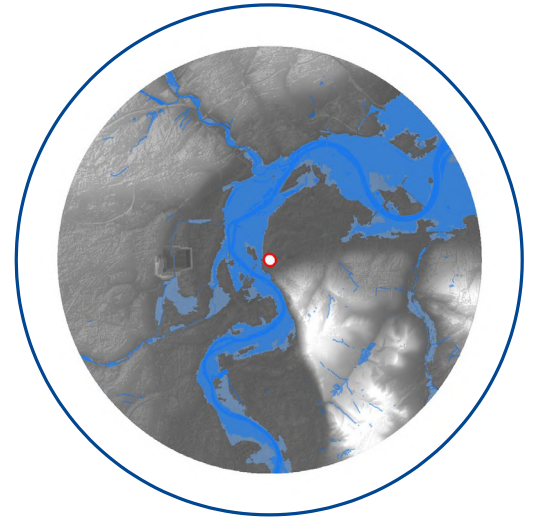
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Report Prepared for

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Report Reference

83183.02R1



RISK - Very Low to Low

The Site is located in Flood Zone 1, which equates to a Very Low probability of flooding from rivers and the sea. Flood mapping also indicates a Very Low risk of fluvial flooding. Surface water (pluvial) flood risks are Very Low. Groundwater flood risks are considered to be Negligible Low and flooding risks from artificial sources (i.e. canals, reservoirs and sewers) are Very Low. Mitigation measures are suggested in order to maintain an adequate level of flood protection.

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1. Executive summary



A review has been undertaken of national environmental data sets to assess the flood risk to the Site from all sources of flooding in accordance with the National Planning Policy Framework (NPPF) (2023) and National Planning Practice Guidance (NPPG) (published in 2014 and updated in August 2022). A site-specific flood risk assessment, to assess the flood risk to and from the development Site, is provided within this concise interpretative report written by an experienced GeoSmart consultant. Baseline flood risk and residual risks that remain after the flood risk management and mitigation measures are implemented are summarised in the table below.

Site analysis

Source of Flood Risk	Baseline ¹	After analysis ²	After Mitigation ³
River (fluvial) flooding	Very Low		N/A
Sea (coastal/tidal) flooding	Very Low		N/A
Surface water (pluvial) flooding	Very Low		N/A
Groundwater flooding	Negligible	Negligible to Low	Very Low
Other flood risk factors present	No	No	No
Is any other further work recommended?	No	No	No

1 BASELINE risks assigned for the whole Site, using national risk maps, including the benefit of EA flood defences.

2 AFTER ANALYSIS modification of risk assessment based on detailed site specific analysis including some or all of the following: flood model data, high resolution mapping, building location, access routes, topographic and CCTV surveys.

3 AFTER MITIGATION risks include risks to proposed development / asset and occupants if mitigation measures recommended in this report are implemented, including the impacts of climate change.

*N/A indicates where mitigation is not required.

Summary of existing and proposed development

The Site is currently used within a residential capacity as a three-storey, semi-detached property including an existing basement level.

Development proposals comprise the demolition of the existing garage situated along the side of the property and the construction of a side extension with associated basement, along with internal alterations to the existing structure plus hard and soft landscaping. Site plans are included within Appendix A.

Summary of flood risks

The flood risks from all sources have been assessed as part of this report and are as follows:

River (fluvial) and Sea (Estuarine/Coastal) flooding

According to the Environment Agency's (EA) Flood Map for Planning Purposes, the Site is located within a fluvial Flood Zone 1 (Low Probability).

According to the EA's Risk of Flooding from Rivers and Sea (RoFRS) map, which considers the type, condition and crest height of flood defences, the Site has a Very Low risk of flooding.

The Site is not located within a Coastal Change Management Area (CCMA).

Surface water (pluvial) flooding

According to the EA's Risk of Flooding from Surface Water (pluvial) flood mapping, the Site has a Very Low risk of pluvial flooding.

Flooding would not affect the area proposed for development in the 1 in 100 year plus climate change event.

A SuDS strategy has been prepared separately (ref: 83183R1) to ensure surface water runoff from the Site is managed over the lifetime of the proposed development.

Groundwater flooding

Groundwater Flood Risk screening data indicates that there is a Negligible potential risk of groundwater flooding at the surface in the vicinity of the Site during a 1 in 100 year event.

Following a review of the local hydrogeological setting (including the presence of an underlying Secondary A Aquifer) and also considering the presence of a basement level at the property, the flood risk rating has been adjusted to Negligible to Low.

Artificial sources of flooding

The risk of flooding from artificial (man-made) sources such as reservoirs, sewers and canals has been assessed:

- The EA's Risk of Flooding from Reservoir map confirms the Site is not at risk of reservoir flooding.
- Ordnance Survey (OS) data confirms there are no canals near to the Site.

- The Strategic Flood Risk Assessment has identified 0 to 10 incidences or modelled incidences of flooding as a result of surcharging sewers within the TW9 1 postcode (Metis, 2021a). However, it is recognised that this four-digit postcode covers a large area and instances of flooding are not specific to the Site.

The risk of flooding from artificial sources is considered to be Very Low.

Recommendations

Recommendations for flood mitigation are provided below, based upon the proposed development and the flood risk identified at the Site.

- As there is a risk of flooding from groundwater sources, risk to buried infrastructure should be considered along with water proofing of basement/lower ground floor areas, standard flood resilient design and non-return valves on the sewer inlet. French drains and/or pumping systems may also be considered.
- The SuDS strategy prepared separately for the Site (report ref: 83183R1) should be fully implemented and suitably maintained.

GeoSmart recommend the mitigation measures discussed within this report are considered as part of the proposed development where possible and evidence of this is provided to the Local Planning Authority as part of the planning application.

2. Introduction



Background and purpose

A site-specific flood risk assessment has been undertaken, to assess the flood risk to and from the development Site. This assessment has been undertaken by firstly compiling information concerning the Site and the surrounding area. The information gathered was then used to construct a 'conceptual site model', including an understanding of the appropriateness of the development as defined in the NPPF (2023) and the source(s) of any flood risk present, guided by the NPPG (published in 2014 and updated in August 2022). Finally, a preliminary assessment of the steps that can be taken to manage flood risk to the development was undertaken.

This report has been prepared with reference to the NPPF (2023) and NPPG (2022).

"The National Planning Policy Framework set out the Government's planning policies for England and how these are expected to be applied" (NPPF, 2023).

The NPPF (2023) and NPPG (2022) promote a sequential, risk-based approach to the location of development. This also applies to locating a development within a Site which has a variable risk of flooding.

"The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding" (Paragraph: 023. NPPG, 2022).

The purpose of this report is to provide clear and pragmatic advice regarding the nature and potential significance of flood hazards which may be present at the Site.

Report scope

In accordance with the requirements set out within NPPG 2022 (Paragraph: 021 Reference ID: 7-021-20220825), a thorough review of publicly and commercially available flood risk data and EA supplied data indicating potential sources of flood risk to the Site from rivers and coastal sources, surface run-off (pluvial), groundwater and reservoirs, including historical flood information and modelled flood extent. Appropriate measures are recommended to manage and mitigate the flood risk to the property.

Information obtained from the EA and a review of the Richmond upon Thames Strategic Flood Risk Assessment (SFRA) - Level 1 (Metis, 2021a), the Richmond upon Thames Surface Water Management Plan (Metis, 2021b) and the Local Plan (London Borough of Richmond upon Thames, 2018) are used to ascertain local flooding issues and, where appropriate, identify information to support a Sequential and/or Exception test required as part of the NPPF (2023).

The existing and future flood risk to and from the Site from all flood sources is assessed in line with current best practice using the best available data. The risk to the development has been assessed over its expected lifetime, including appropriate allowances for the impacts of

climate change. Residual risks that remain after the flood risk management and mitigation measures are implemented, are considered with an explanation of how these risks can be managed to keep the users of the development safe over its lifetime.

An indication of whether the Site will potentially increase flood risk elsewhere is provided, including where the proposed development increases the building footprint at the Site. A separate SuDSmart Plus report has been undertaken by GeoSmart (ref: 83183R1) to control runoff.

Report limitations

It is noted that the findings presented in this report are based on a desk study of information supplied by third parties. Whilst we assume that all information is representative of past and present conditions, we can offer no guarantee as to its validity and a proportionate programme of site investigations would be required to fully verify these findings.

The basemap used is the OS Street View 1:10,000 scale, however the Site boundary has been drawn using BlueSky aerial imagery to ensure the correct extent and proportion of the Site is analysed.

This report excludes consideration of potential hazards arising from any activities at the Site other than normal use and occupancy for the intended land uses. Hazards associated with any other activities have not been assessed and must be subject to a specific risk assessment by the parties responsible for those activities.

Datasets

The following table shows the sources of information that have been consulted as part of this report:

Table 1. Datasets consulted to obtain confirmation of sources of flooding and risk

Source of flooding	Datasets consulted				
	Commercial Flood Maps	Local Policy & Guidance Documents*	Environment Agency	Utility provider	OS Data
Historical	X	X	X		
River (fluvial) / Sea (tidal/coastal)	X	X	X		
Surface water (pluvial)	X	X	X		
Groundwater	X	X			
Sewer		X		X	
Culvert/bridges		X			X
Reservoir		X	X		

*Local guidance and policy, referenced below, has been consulted to determine local flood conditions and requirements for flood mitigation measures.

Local policy and guidance

For this report, several documents have been consulted for local policy and guidance and relevant information is outlined below:

Local Plan (London Borough of Richmond upon Thames, 2018)

Policy LP 21

Flood Risk and Sustainable Drainage

A. All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. Unacceptable developments and land uses will be refused in line with national policy and guidance, the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the table below.

In Flood Zones 2 and 3, all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.

Where a Flood Risk Assessment is required, on-site attenuation to alleviate fluvial and/or surface water flooding over and above the Environment Agency's floodplain compensation is required where feasible.

	Land uses and developments – restrictions	Sequential Test	Exception Test	Flood Risk Assessment
Zone 3b	<p>The functional floodplain as identified in the Council's Strategic Flood Risk Assessment will be protected by not permitting any form of development on undeveloped sites unless it:</p> <ul style="list-style-type: none"> • is for Water Compatible development; • is for essential utility infrastructure which has to be located in a flood risk area and no alternative locations are available and it can be demonstrated that the development would be safe, without increasing flood risk elsewhere and where possible would reduce flood risk overall. <p>Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.</p> <p>Proposals for the change of use or conversion to a use with a higher vulnerability classification will not be permitted.</p>	Required for essential utility infrastructure	Required for essential utility infrastructure	Required for all development proposals

Zone 3a	Land uses are restricted to Water Compatible, Less Vulnerable and More Vulnerable development. Highly Vulnerable developments will not be permitted. Self-contained residential basements and bedrooms at basement level will not be permitted.	Required for all developments unless exceptions outlined in the justification apply	Required for more vulnerable development	Required for all development proposals
Zone 2	No land use restrictions Self-contained residential basements and bedrooms at basement level will not be permitted.	Required for all developments unless exceptions outlined in the justification apply	Required for highly vulnerable development	Required for all development proposals unless for change of use from water compatible to less vulnerable
Zone 1	No land use restrictions	Not applicable	Not applicable	A Drainage Statement is required for sites all major developments. Required for all other development proposals where there is evidence of a risk from other sources of flooding, including surface water, ground water and sewer flooding.

Guidance

Strategic Flood Risk Assessments are carried out by local authorities, in consultation with the Environment Agency, to assess the flood risk to the area from all sources both now and in the future due to climate change. They are used to inform planning decisions to ensure inappropriate development is avoided (NPPF, 2023).



Site information

The Site is located in Richmond, Greater London in a setting of residential land use at National Grid Reference TQ 17660 75113.

Figure 1. Aerial imagery of the Site (Bluesky, 2024)

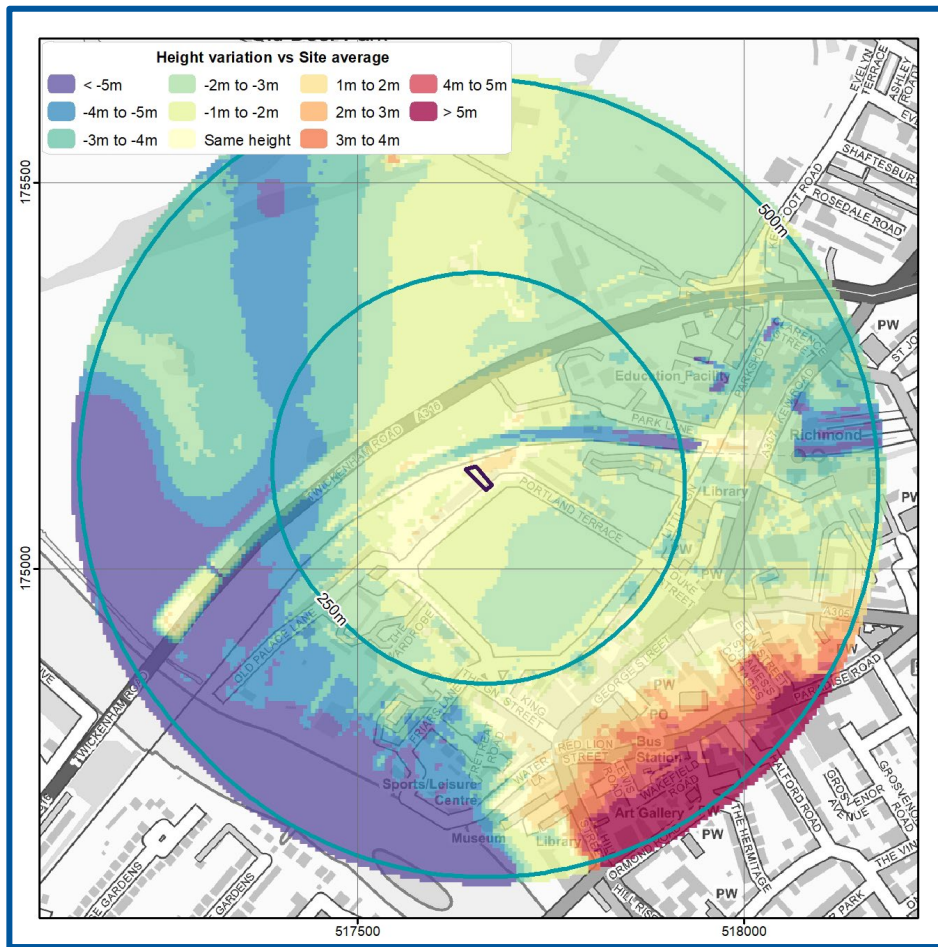


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Figure 2 below indicates ground levels within 500m of the Site typically fall in a south westerly direction.

The general ground levels on-Site are between 8.45 mAOD and 9.99 mAOD with the Site falling gradually in an north westerly direction. This is based on EA elevation data obtained for the Site to a 1 m resolution with a vertical accuracy of ± 0.15 m (Appendix B).

Figure 2. Site Location and Relative Elevations (GeoSmart, 2024)



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Development

The Site is currently used within a residential capacity as a three-storey semi-detached property including a basement level.

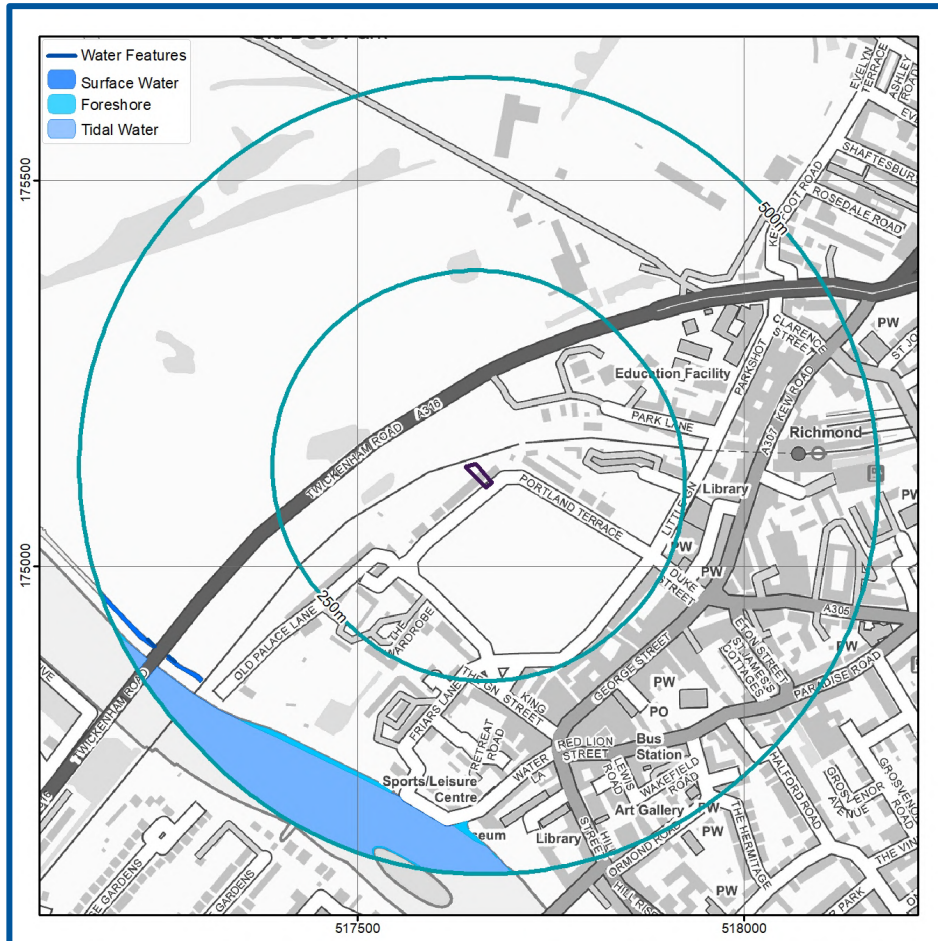
Development proposals comprise the demolition of the existing garage situated along the side of the property and the construction of a side extension with associated basement, along with internal alterations to the existing structure plus hard and soft landscaping. Site plans are included within Appendix A.

The effect of the overall development will not result in an increase in number of occupants and/or users of the Site and will not result in the change of use, nature or times of occupation. According to Annex 3 of the NPPG (2022), the vulnerability classification of the existing development is More Vulnerable and proposed development is More Vulnerable. The estimated lifespan of the development is 100 years.

Hydrological features

According to Ordnance Survey (OS) mapping included in Figure 3, there are a limited number of surface water features within 500 m of the Site.

Figure 3. Surface water features (EA, 2024)



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The River Thames, as well as a small stream associated with Old Deer Park, are located approximately 425 m south-west of the Site.

Proximity to relevant infrastructure

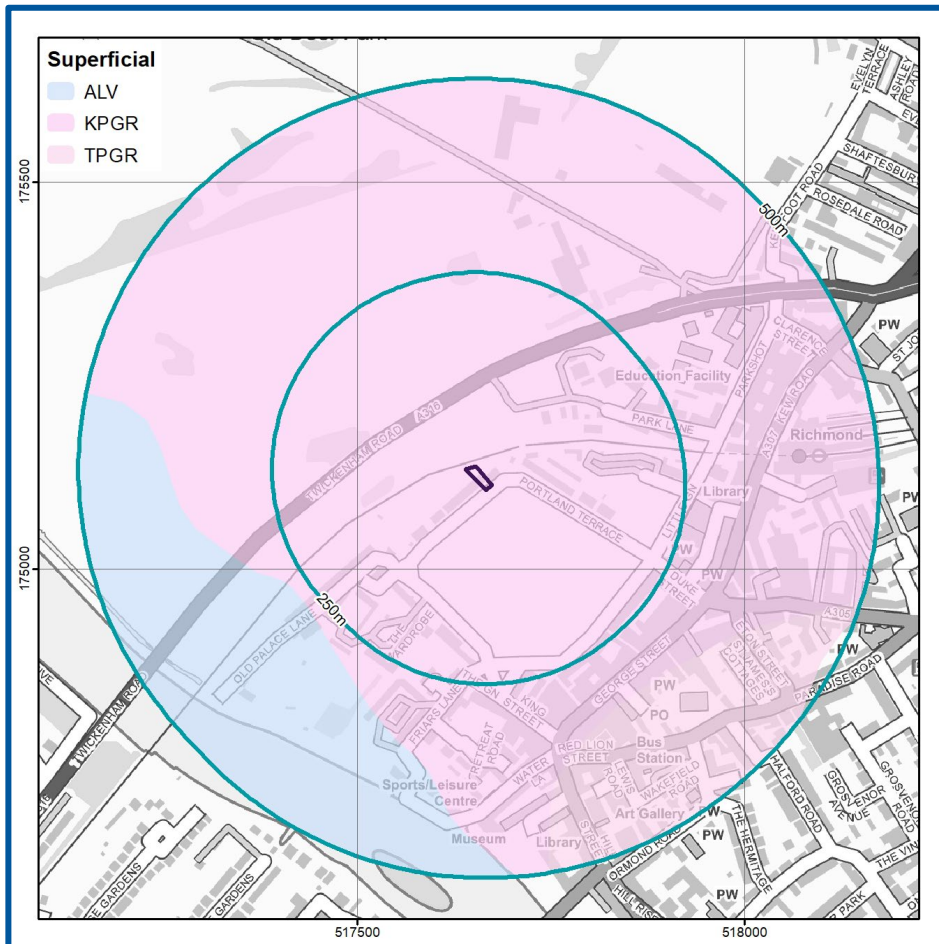
A cutting railway line is situated directly to the north of the Site.

Twickenham Road (A316) crosses the River Thames on a bridge located approximately 490 m south-west of the Site.

Hydrogeological features

British Geological Survey (BGS) mapping indicates that the underlying superficial geology (Figure 4) consists of the Kempton Park Gravel Member (KPGR) (BGS, 2024) which is classified as a Secondary (A) Aquifer (EA, 2024).

Figure 4. Superficial Geology (BGS, 2024)



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BGS mapping indicates that the underlying bedrock geology (Figure 5) consists of the London Clay Formation (LC) (BGS, 2024) which is classified as an Unproductive Strata (EA, 2024).

Figure 5. Bedrock Geology (BGS, 2024)



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Geological conditions

A review of the BGS borehole database (BGS, 2024) indicates that the nearest and most relevant borehole to the Site (ref: TQ17NE494) is located c. 60 m to the south west of the Site boundary at an elevation of 9.52 mAOD; the corresponding borehole record indicates that the underlying geology consists of gravels to a depth of 7.5m below ground level (bgl), overlying brown London Clay to a depth of 31.5m bgl, overlying bluer London Clay to a depth of 52.5m bgl, overlying Harwich beds to a depth of 61m bgl, overlying red clays to a depth of 70m bgl, overlying white, green and yellow clay to a depth of 70.5m bgl, overlying Thanet Sands to a depth of 79.5m bgl, overlying flints with green sandy clay to a depth of 81m bgl, overlying small rounded flint to a depth of 87m bgl, overlying chalk containing no flint to a depth of 104m bgl.

Groundwater

Groundwater was not encountered / recorded in the borehole records associated with BGS borehole ref: TQ17NE494 and could not be found in any of the surrounding borehole records.

4. Flood risk to the development



Historical flood events

According to the EA's Historical Flood Map (Figure 6), there have been no recorded flooding events which have affected the Site.

The purpose of historical flood data is to provide information on where and why flooding may have occurred in the past. The absence of any recorded events does not mean flooding has never occurred on-Site or that flooding will never occur at the Site.

Figure 6. EA Historic Flood Map (EA, 2024)

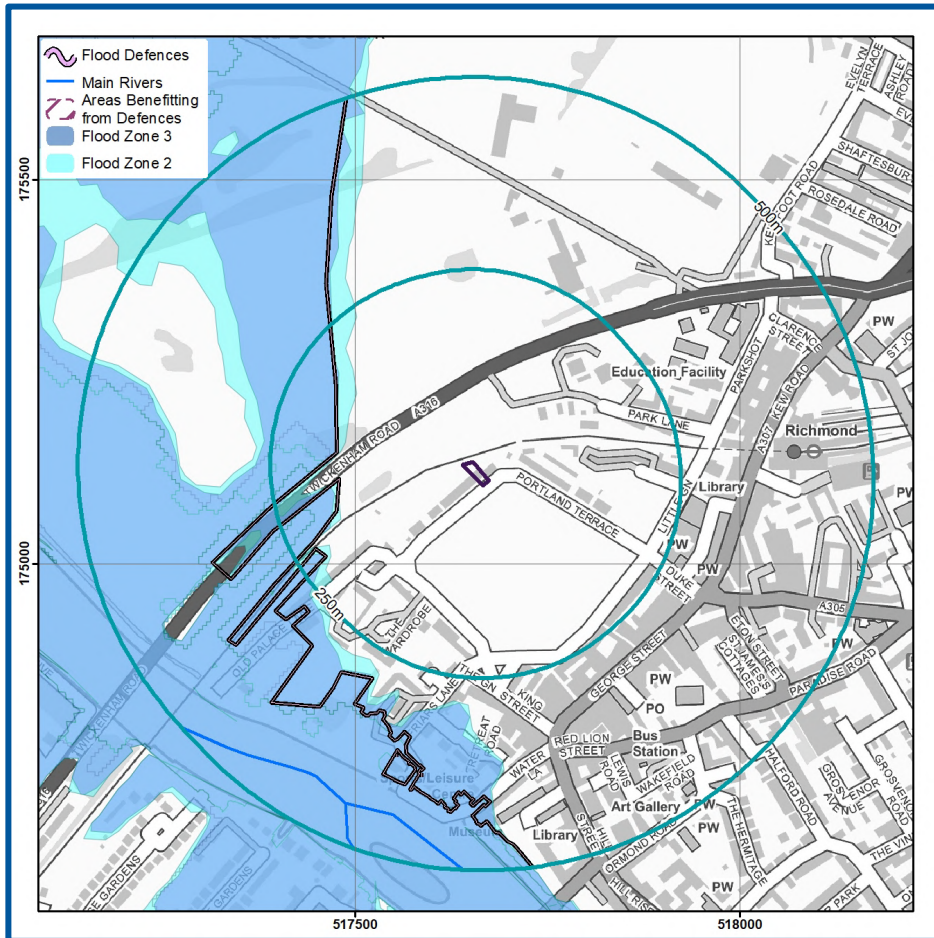


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Rivers (fluvial) / Sea (coastal) / Estuarine (tidal) flooding

According to the EA's Flood Map for Planning Purposes (Figure 7), the Site is located within fluvial Flood Zone 1 and is therefore classified as having a Low probability of fluvial flooding from the River Thames.

Figure 7. EA Flood Map for Planning Purposes (EA, 2024)



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Guidance

As defined in the NPPF (2023):

Ignoring the presence of any defences, land located in a Flood Zone 1 is considered to have a Low probability of flooding, with less than a 1 in 1000 annual probability of fluvial or coastal flooding in any one year.

Development of all uses of land is appropriate in this zone (see glossary for terminology).

Flood risk including the benefit of defences

The type and condition of existing flood defences influence the 'actual' risk of fluvial flooding to the Site, albeit the long-term residual risk of flooding (ignoring the defences) should be considered when proposing new development.

According to the EA's Risk of Flooding from Rivers and Sea (RoFRS) map (Figure 8), which considers the type, condition and crest height of flood defences, the Site has a Very Low risk of flooding from the nearby watercourse, the River Thames.

Figure 8. Risk of Flooding from Rivers and Sea map (EA, 2024)



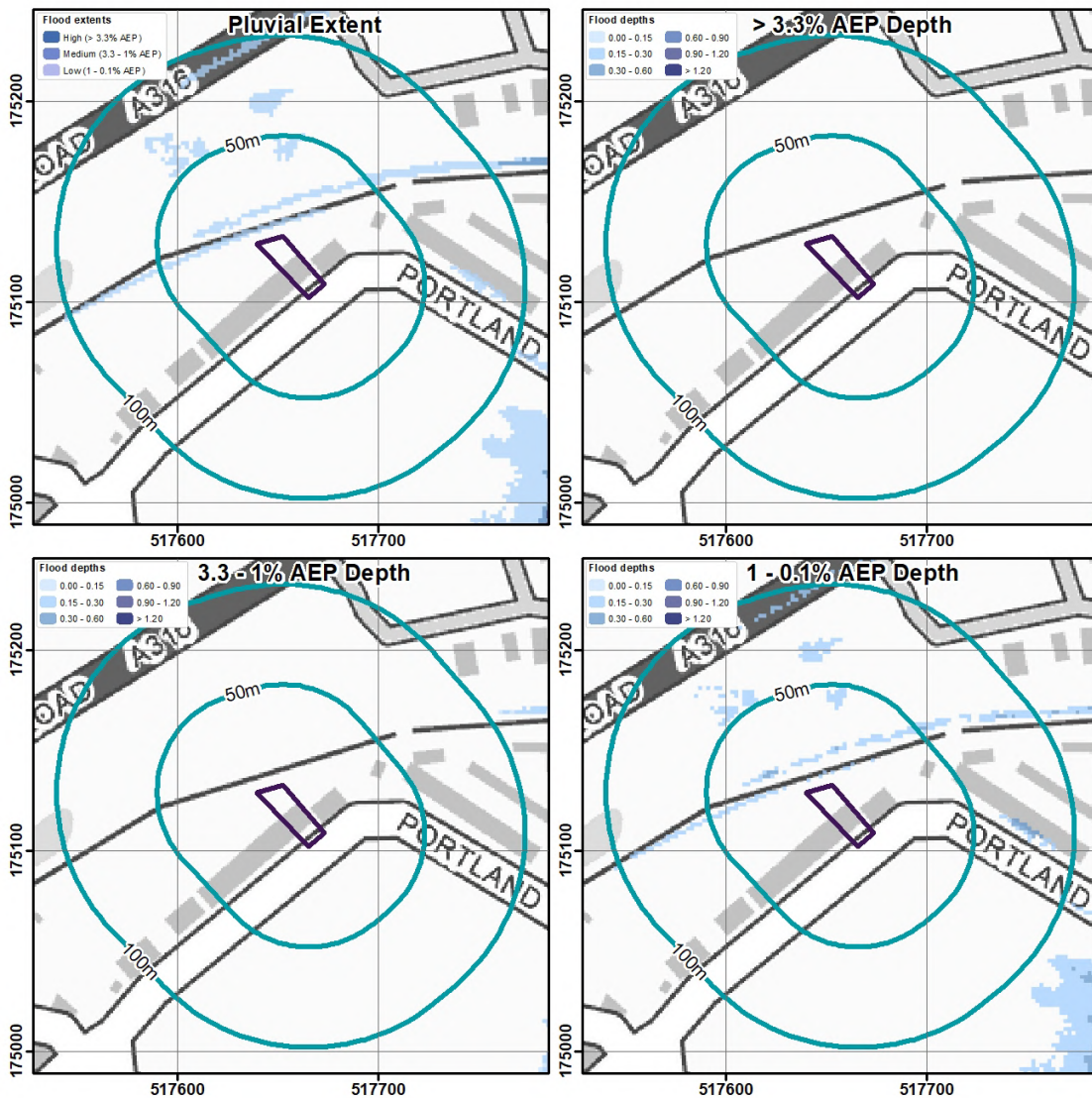
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Surface water (pluvial) flooding

Surface water flooding occurs when intense rainfall exceeds the infiltration capacity of the ground and overwhelms the drainage systems. It can occur in most locations even at higher elevations and at significant distances from river and coastal floodplains.

According to the EA's Risk of Flooding from Surface Water (pluvial) flood mapping (Figure 9), the Site has a Very Low risk of pluvial flooding¹.

Figure 9. EA surface water flood extent and depth map (EA, 2024)



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¹ Environment Agency. April 2019. What is the Risk of Flooding from Surface Water map? Version 2.0. Accessed from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/842485/What-is-the-Risk-of-Flooding-from-Surface-Water-Map.pdf

Guidance

According to EA's surface water flood risk map the Site is at Very Low risk - chance of flooding of less than 1 in 1000 (0.1%).

The SFRA does not indicate any reported incidents of historical surface water flooding within 100 m of the Site (Metis, 2021a). The SWMP confirms the Site is located within a Critical Drainage Area (CDA)² (Metis, 2021b).

Flooding depths of up to 0.30 m are mapped adjacent to the north of the Site (Figure 9), but these are likely to be contained within the adjacent cutting railway so are unlikely to affect the Site.

Guidance

According to EA's surface water flood risk map the following advisory guidance applies to the Site:

Flood Depths:

- 0.15 to 0.3 m - Flooding would: typically exceed kerb height, likely exceed the level of a damp-proof course, cause property flooding in some areas.

Climate change factors

Paragraph 002 of the National Planning Practice Guidance (August, 2022) requires consideration of the 1% AP (1 in 100 year) event, including an appropriate allowance for climate change.

As the Site is located within the London Management Catchment and the proposed development is classed as More Vulnerable, where the proposed lifespan is approximately 100 years. years, the Upper End (40%) allowance is required to determine a suitable climate change factor to apply to rainfall data.

The 0.1% AP (1 in 1000 year) surface water flooding event has been used as a proxy in this instance for the 1% AP (1 in 100 year) plus climate change event.

² A Critical Drainage Area (CDA) is an area that has critical drainage problems and which has been notified to the local planning authority as such by the Environment Agency in line with the National Planning Policy Framework (NPPF, 2023). CDA's are specific to Flood Zone 1, defined as areas where runoff can and may have historically contributed to flooding downstream, although they are not necessarily areas where flooding problems may occur. Where a Site is located in Flood Zone 1 and within a CDA, a Flood Risk Assessment (FRA) is required and the Council may also request Sustainable Drainage Scheme (SuDS) features to be included within the proposed development.

Surface water flooding flow routes

Analysis of OS mapping, ground elevation data and the EA's pluvial flow route mapping in the 1 in 1000 year (Low probability) event confirms the Site is not located on a potential overland flow route.

Groundwater flooding

Groundwater flooding occurs when sub-surface water emerges from the ground at the surface or into Made Ground and structures. This may be as a result of persistent rainfall that recharges aquifers until they are full; or may be as a result of high river levels, or tides, driving water through near-surface deposits. Flooding may last a long time compared to surface water flooding, from weeks to months. Hence the amount of damage that is caused to property may be substantially higher.

Groundwater Flood Risk screening data (Figure 10) indicates that there is a Negligible risk of groundwater flooding at surface in the vicinity from permeable superficial deposits during a 1 in 100 year event.

Figure 10. GeoSmart GW5 Groundwater Flood Risk Map (GeoSmart, 2024)



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Mapped classes within the screening map combine likelihood, possible severity and the uncertainty associated with predicting the subsurface system. The map is a national scale screening tool to prompt site-specific assessment where the impact of groundwater flooding would have significant adverse consequences. Mapping limitations and a number of local factors may reduce groundwater flood risk to land and property even where it lies within mapped groundwater flood risk zones, which do not mean that groundwater floods will occur across the whole of the risk area.

A site-specific assessment has been undertaken to refine the groundwater risk screening information on the basis of site-specific datasets (see Section 3) including BGS borehole data and the EA's fluvial and tidal floodplain data (where available) to develop a conceptual groundwater model. The risk rating is refined further using the vulnerability of receptors including occupants and the existing and proposed Site layout, including the presence of basements and buried infrastructure. The presence of any nearby or on-Site surface water

features such as drainage ditches, which could intercept groundwater have also been considered.

It is understood the Site contains an existing basement level which will be extended as part of the development proposals. The floor level within the existing basement is set c. 1.48 m bgl; the proposed basement extension will remain at this depth. Note: the flood risks are higher for basements, buried infrastructure and soakaway systems which may be affected by high groundwater levels.

According to a review of the hydrogeology (Section 3), the Site is underlain by permeable superficial deposits above low permeability bedrock. A shallow groundwater table could potentially exist within the superficial aquifer. Groundwater levels may rise in the superficial aquifer in a seasonal response to prolonged rainfall recharge which may cause an unusually high peak in groundwater levels during some years.

Despite the presence of an underlying aquifer the Site would only be at risk of groundwater flooding if the water table reaches the base of the Site development or the ground surface when groundwater seepage could lead to overland flow and ponding.

According to a review of the hydrogeology (Section 3), the nearby BGS borehole records do not record any groundwater depths within the superficial deposits; it is uncertain whether this reflects the absence of shallow groundwater or the omission of any groundwater observations from the available logs. Note: the nearest borehole (ref: TQ17NE494) did not record any groundwater to a drill depth of 104m bgl.

The formation of a spring line could occur at the junction between the superficial gravels and any outcrops of the low permeability London Clay. However, no spring lines have been identified in close proximity to the Site.

The baseline groundwater flood risk rating is Negligible; on the basis of the site-specific assessment, including the presence of a basement structure, the actual groundwater flood risk is considered to be Negligible to Low.

Guidance

Negligible Risk - There will be a remote possibility that incidence of groundwater flooding could lead to damage to property or harm to other sensitive receptors at, or near, this location.

Low Risk - There will be a remote possibility that incidence of groundwater flooding could lead to damage to property or harm to other sensitive receptors at, or near, this location.

Climate change predictions suggest an increase in the frequency and intensity of extremes in groundwater levels. Rainfall recharge patterns will vary regionally resulting in changes to average groundwater levels. A rise in peak river levels will lead to a response of increased groundwater levels in adjacent aquifers subject to the predicted climate change increases in peak river level for the local catchment. Sea level rises of between 0.4m and 1m are predicted

by 2100, leading to a rise in average groundwater levels in the adjacent coastal aquifer systems, and potential increases in water levels in the associated drainage systems. The 'backing up' of groundwater levels from both coast and tidal estuary locations may extend a significant distance inland and affect infrastructure previously constructed above average groundwater levels.

The impact of climate change on groundwater levels beneath the Site is linked to the predicted risk in peak river levels and also the variation in rainfall recharge which is uncertain.

Flooding from artificial sources

Artificial sources of flood risk include waterbodies or watercourses that have been amended by means of human intervention rather than natural processes. Examples include reservoirs (and associated water supply infrastructure), docks, sewers and canals. The flooding mechanism associated with flood risk from artificial sources is primarily related to breach or failure of structures (reservoir, lake, sewer, canal, flood storage areas, etc.).

Sewer flooding

The interactive mapping (Groundwater Sewer Artificial Flood Risk Map) of the SFRA has identified 0 to 10 incidences or modelled incidences of flooding as a result of surcharging sewers within the TW9 1 postcode (Metis, 2021a). However, it is recognised that this four-digit postcode covers a large area and instances of flooding are not specific to the Site.

Guidance

Properties classified as “at risk” are those that have suffered, or are likely to suffer, internal flooding from public foul, combined or surface water sewers due to overloading of the sewerage system either once or twice in the ten year reference period. Records held by the sewage utility company provide information relating to reported incidents, the absence of any records does not mean that the Site is not at risk of flooding.

Canal failure

According to Ordnance Survey (OS) mapping, there are no canals within 500 m of the Site.

Water supply infrastructure

Water supply infrastructure is comprised of a piped network to distribute water to private houses or industrial, commercial or institution establishments and other usage points. In urban areas, this represents a particular risk of flooding due to the large amount of water supply infrastructure, its condition and the density of buildings. The risks of flooding to properties from burst water mains cannot be readily assessed.

If more information regarding the condition and history of the water supply infrastructure within the vicinity of the Site is required, then it is advisable to contact the local water supplier, Thames Water.

Culverts and bridges

The blockage of watercourses or structures by debris (that is, any material moved by a flowing stream including vegetation, sediment and man-made materials or refuse) reduces flow capacity and raises water levels, potentially increasing the risk of flooding. High water levels can cause saturation, seepage and percolation leading to failure of earth embankments or other structures. Debris accumulations can change flow patterns, leading to scour, sedimentation or structural failure.

Culverts and bridges have not been identified within 50 m of the Site.

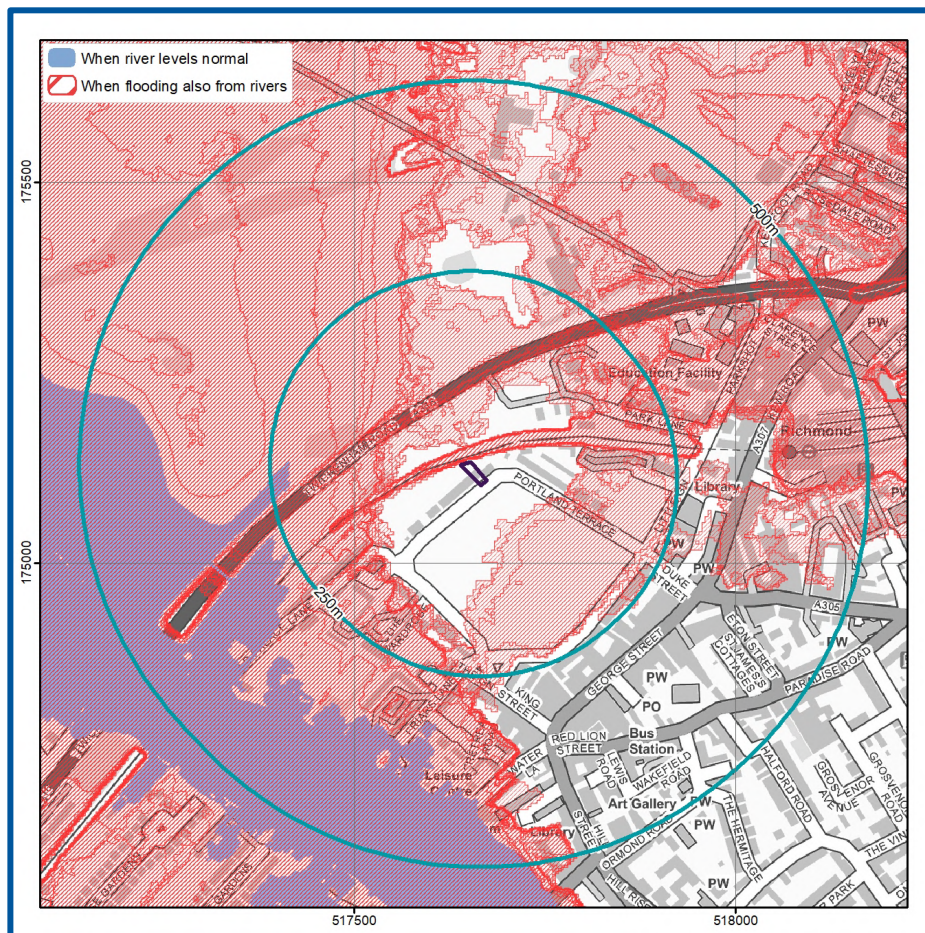
The SFRA has not identified any historical drainage issues within the Site area (Metis, 2021a).

Reservoir flooding

According to the EA's Risk of Flooding from Reservoir mapping the Site is not at risk of flooding from reservoirs (Figure 11) (EA, 2024).

Should reservoir flooding occur at the same time as fluvial flooding, it is expected that flooding will occur along the adjacent railway tracks to the north of the Site. This flooding will be contained within this area due to it being located at a lower elevation and therefore will not impact the Site.

Figure 11. EA Risk of Reservoir Flooding (EA, 2024)



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Guidance

The risk of reservoir flooding is related to the failure of a large reservoir (holding over 25,000 m³ of water) and is based on the worst-case scenario. Reservoir flooding is extremely unlikely to occur (EA, 2024).

5. Flood risk from the development



Floodplain storage

Where flood storage from any source of flooding is to be lost as a result of development, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided. Where it is not possible to provide compensatory storage on-site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked.

The loss of floodplain storage is less likely to be a concern in areas benefitting from appropriate flood risk management infrastructure or where the source of flood risk is solely tidal.

The development will remain flood free during surface water flooding events up to the 1 in 100 year with an allowance for climate change and hence compensatory storage is not required.

Drainage and run-off

Based on the topography and low surface water flood risk in the vicinity, interference or interaction with overland flow paths and inflows from off-Site is considered unlikely.

The proposed development involves an increase of impermeable surfaces at the Site. An estimation of run-off is therefore required to permit effective Site water management and prevent any increase in flood risk to off-Site receptors from the Site.

A Sustainable Drainage Strategy has been prepared separately by GeoSmart (ref: 83183R1) to manage the increased in runoff from the Site.

Table 2. Climate change rainfall allowances

London Management Catchment	3.3% Annual exceedance rainfall event		1% Annual exceedance rainfall event	
	2050s	2070s	2050s	2070s
Upper end	35%	35%	40%	40%
Central	20%	25%	20%	25%

6. Suitability of the proposed development



The information below outlines the suitability of proposed development in relation to national and local planning policy.

National policy and guidance

The aims of the national planning policies are achieved through application of the Sequential Test and in some cases the Exception Test.

Guidance

Sequential test: The aim of this test is to steer new development towards areas with the lowest risk of flooding (NPPF, 2023). Reasonably available sites located in Flood Zone 1 should be considered before those in Flood Zone 2 and only when there are no reasonably available sites in Flood Zones 1 and 2 should development in Flood Zone 3 be considered.

Exception test: In some cases, this may need to be applied once the Sequential Test has been considered. For the exception test to be passed it must be demonstrated that the development would provide wider sustainability benefits to the community that outweigh flood risk and a site-specific FRA must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Suitability of the proposed development, and whether the Sequential and Exception Tests are required, is based on the Flood Zone the Site is located within and the flood risk vulnerability classification of the existing and proposed development. Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.

This report has been produced to assess all development types, prior to any development. The vulnerability classification and Flood Zones are compared within the table overleaf (Table 2 of the NPPG (2022)).

As the Site is located within Flood Zone 1, all types of development listed within the Table overleaf are acceptable according to National Policy.

Table 3. Flood risk vulnerability and flood zone ‘incompatibility’ (taken from NPPG, 2022)

Flood risk vulnerability classification		Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood Zone	Zone 1 – low probability	✓	✓	✓	✓	✓
	Zone 2 – medium probability	✓	✓	Exception test required	✓	✓
	Zone 3a – high probability	Exception test required	✓	X	Exception test required	✓
	Zone 3b – functional flood plain	Exception test required	✓	X	X	X

7. Resilience and mitigation



Based on the flood risk identified at the Site, the national and local policies and guidance and proposed development, the mitigation measures outlined within this section of the report are likely to help protect the development from flooding.

Sea (coastal/tidal) flood mitigation measures

As the Site is not identified as being at risk of flooding from sea (coastal/tidal) sources, mitigation measures are not required.

Rivers (fluvial) flood mitigation measures

As the Site is not identified as being at risk of flooding from fluvial sources, mitigation measures are not required.

Surface water (pluvial) flood mitigation measures

As the Site is not identified as being at risk of pluvial flooding, mitigation measures are not required.

A surface water drainage (SuDS) strategy has been prepared separately (ref: 83183R1) to ensure surface water runoff can be managed effectively over the lifetime of the proposed development.

Groundwater flood mitigation measures

A Negligible to Low risk of groundwater flooding has been identified at the Site. In order to ensure the development includes sufficient flood mitigation measures to reduce the risk of groundwater flooding over its lifetime, the following mitigation measures should be considered in the design process:

- Waterproof tanking of the ground floor and basement;
- Interceptor drains;
- Automatic sump to extract flood water; and
- Non-return flap valves on the proposed foul and surface water sewer lines.

If these mitigation measures are implemented this could reduce the flood risk to the development from Negligible - Low to Negligible.

Reservoir flood mitigation measures

The Site is not a risk of flooding from reservoirs; therefore, mitigation measures are not required.

Other flood risk mitigation measures

As the Site is not identified as at risk from other sources, mitigation measures are not required.

Residual flood risk mitigation measures

The risk to the Site has been assessed from all sources of flooding and appropriate mitigation and management measures proposed to keep the users of the development safe over its lifetime. There is however a residual risk of flooding associated with the potential for failure of mitigation measures if regular maintenance and upkeep isn't undertaken. If mitigation measures are not implemented or maintained, the risk to the development will remain as the baseline risk.

Further flood mitigation information

More information on flood resistance, resilience and water entry can be found here: http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf

www.knowyourfloodrisk.co.uk

Emergency evacuation - safe access / egress and safe refuge

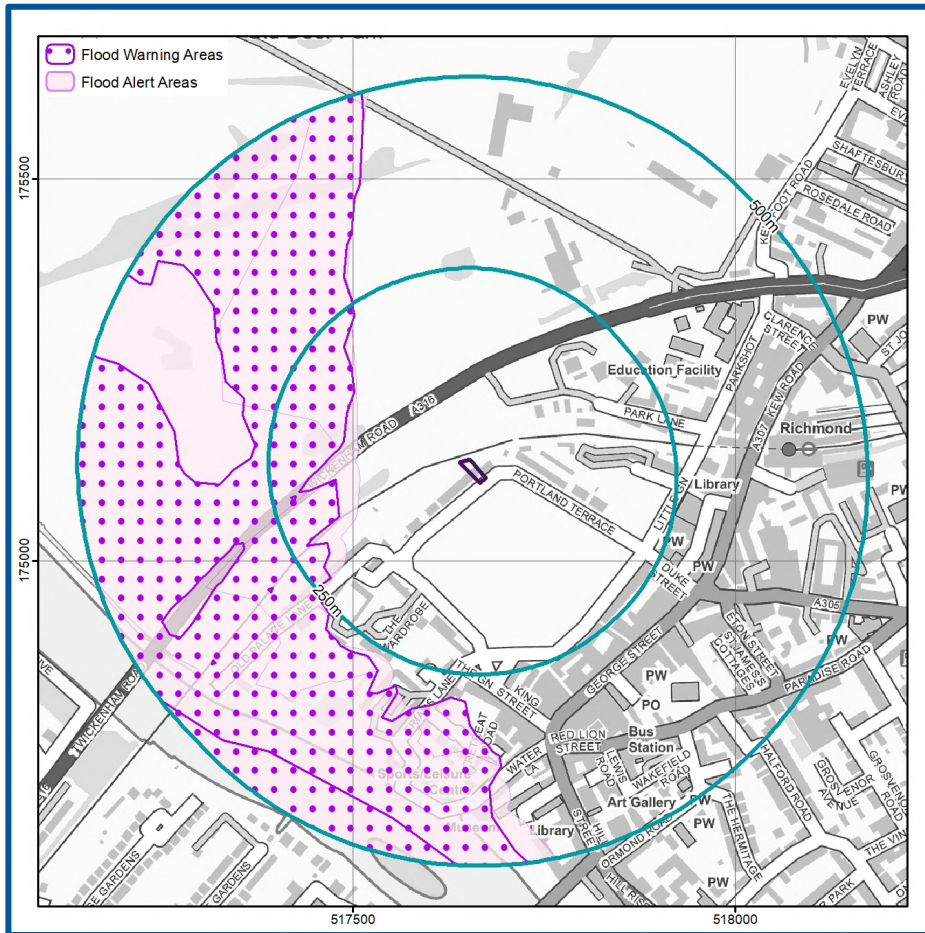
Emergency evacuation to land outside of the floodplain should be provided if feasible. Where this is not possible, 'more vulnerable' developments and, where possible, development in general (including basements), should have internal stair access to an area of safe refuge within the building to a level higher than the maximum likely water level. An area of safe refuge should be sufficient in size for all potential users and be reasonably accessible to the emergency services.

Emergency evacuation from the development and the Site should only be undertaken in strict accordance with any evacuation plans produced for the Site, with an understanding of the flood risks at the Site including available mitigation, the vulnerability of occupants and preferred evacuation routes.

Flood warnings

The EA operates a flood warning service in all areas at risk of flooding; this is available on their website: <https://www.gov.uk/check-flood-risk>. The Site is not located within an EA Flood Alerts/Warning coverage area so is not able to receive alerts and/or warnings (Figure 12).

Figure 12. EA Flood Warning Coverage for the local area (EA, 2024).



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On-Site refuge

In the unlikely event of a flooding incident, evacuation should be the primary action, however safe refuge could be sought at first floor level in a worst-case scenario as residential areas of the development are situated on the first and second floors.

Other relevant information

It is recommended that main communication lines required for contacting the emergency services, electricity sockets/meters, water supply and first aid stations and supplies are not compromised by flood waters. Where possible these should all be raised above the extreme flood level.

8. Conclusions and recommendations



Table 4. Risk ratings following Site analysis

Source of Flood Risk	Baseline ¹	After analysis ²	After Mitigation ³
River (fluvial) flooding	Very Low		N/A
Sea (coastal/tidal) flooding	Very Low		N/A
Surface water (pluvial) flooding	Very Low		N/A
Groundwater flooding	Negligible	Negligible to Low	Very Low
Other flood risk factors present	No	No	No
Is any other further work recommended?	No	No	No

1 BASELINE risks assigned for the whole Site, using national risk maps, including the benefit of EA flood defences.

2 AFTER ANALYSIS modification of risk assessment based on detailed site specific analysis including some or all of the following: flood model data, high resolution mapping, building location, access routes, topographic and CCTV surveys.

3 AFTER MITIGATION risks include risks to proposed development / asset and occupants if mitigation measures recommended in this report are implemented, including the impacts of climate change.

*N/A indicates where mitigation is not required.

The table below provides a summary of where the responses to key questions are discussed in this report.

More vulnerable developments in a Flood Zone 1 are acceptable according to the NPPF.


Table 5. Summary of responses to key questions in the report

Key sources of flood risks identified	Groundwater (see Section 4).
Are standard mitigation measures likely to provide protection from flooding to/from the Site?	Yes (see Section 7).
Is any further work recommended?	Yes (see Section 7).

9. Further information



The following table includes a list of additional products by GeoSmart:

Additional GeoSmart Products		
✓	<p>Additional assessment: EnviroSmart Report</p>	<div style="text-align: center;">  </div> <p>Provides a robust desk-based assessment of potential contaminated land issues, taking into account the regulatory perspective.</p> <p>Our EnviroSmart reports are designed to be the most cost effective solution for planning conditions. Each report is individually prepared by a highly experienced consultant conversant with Local Authority requirements.</p> <p>Ideal for pre-planning or for addressing planning conditions for small developments. Can also be used for land transactions.</p> <p>Please contact info@geosmartinfo.co.uk for further information.</p>



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Glossary

General terms

BGS	British Geological Survey
EA	Environment Agency
GeoSmart groundwater flood risk model	GeoSmart's national groundwater flood risk model takes advantage of all the available data and provides a preliminary indication of groundwater flood risk on a 50m grid covering England and Wales. The model indicates the risk of the water table coming within 1 m of the ground surface for an indicative 1 in 100 year return period scenario.
Dry-Island	An area considered at low risk of flooding (e.g. In a Flood Zone 1) that is entirely surrounded by areas at higher risk of flooding (e.g. Flood Zone 2 and 3)
Flood resilience	Flood resilience or wet-proofing accepts that water will enter the building, but through careful design will minimise damage and allow the re-occupancy of the building quickly. Mitigation measures that reduce the damage to a property caused by flooding can include water entry strategies, raising electrical sockets off the floor, hard flooring.
Flood resistance	Flood resistance, or dry-proofing, stops water entering a building. Mitigation measures that prevent or reduce the likelihood of water entering a property can include raising flood levels or installation of sandbags.
Flood Zone 1	This zone has less than a 0.1% annual probability of river flooding
Flood Zone 2	This zone has between 0.1 and 1% annual probability of river flooding and between 0.1% and 0.5 % annual probability sea flooding
Flood Zone 3	This zone has more than a 1% annual probability of river flooding and 0.5% annual probability of sea flooding
Functional Flood Plain	An area of land where water has to flow or be stored in times of flood.
Hydrologic model	A computer model that simulates surface run-off or fluvial flow. The typical accuracy of hydrologic models such as this is $\pm 0.25\text{m}$ for estimating flood levels at particular locations.
OS	Ordnance Survey
Residual Flood Risk	The flood risk remaining after taking mitigating actions.
SFRA	Strategic Flood Risk Assessment. This is a brief flood risk assessment provided by the local council

SuDS A Sustainable drainage system (SuDS) is designed to replicate, as closely as possible, the natural drainage from the Site (before development) to ensure that the flood risk downstream of the Site does not increase as a result of the land being developed. SuDS also significantly improve the quality of water leaving the Site and can also improve the amenity and biodiversity that a Site has to offer. There are a range of SuDS options available to provide effective surface water management that intercept and store excess run-off. Sites over 1 Ha will usually require a sustainable drainage assessment if planning permission is required. The current proposal is that from April 2014 for more than a single dwelling the drainage system will require approval from the SuDS Approval Board (SABs).

Aquifer Types

Principal aquifer These are layers of rock or drift deposits that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale.

Secondary A aquifer Permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.

Secondary B aquifer Predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering.

Secondary undifferentiated Has been assigned in cases where it has not been possible to attribute either category A or B to a rock type due to the variable characteristics of the rock type.

Unproductive Strata These are rock layers or drift deposits with low permeability that has negligible significance for water supply or river base flow.

NPPF (2023) terms

Exception test Applied once the sequential test has been passed. For the exception test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk and a site-specific FRA must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Sequential test Aims to steer new development to areas with the lowest probability of flooding.

Essential infrastructure Essential infrastructure includes essential transport infrastructure, essential utility infrastructure and wind turbines.

Water compatible	Water compatible land uses include flood control infrastructure, water-based recreation and lifeguard/coastal stations.
Less vulnerable	Less vulnerable land uses include police/ambulance/fire stations which are not required to be operational during flooding and buildings used for shops/financial/professional/other services.
More vulnerable	More vulnerable land uses include hospitals, residential institutions, buildings used for dwelling houses/student halls/drinking establishments/hotels and sites used for holiday or short-let caravans and camping.
Highly vulnerable	Highly vulnerable land uses include police/ambulance/fire stations which are required to be operational during flooding, basement dwellings and caravans/mobile homes/park homes intended for permanent residential use.

Data Sources

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Bedrock & Superficial Geology	Contains British Geological Survey materials © NERC 2024 Ordnance Survey data © Crown copyright and database right 2024
Flood Risk (Flood Zone/RoFRS/Historic Flooding/Pluvial/Surface Water Features/Reservoir/ Flood Alert & Warning)	Environment Agency copyright and database rights 2024 Ordnance Survey data © Crown copyright and database right 2024
Flood Risk (Groundwater)	GeoSmart, BGS & OS GW5 (v2.4) Map (GeoSmart, 2024) Contains British Geological Survey materials © NERC 2024 Ordnance Survey data © Crown copyright and database right 2024
Location Plan	Contains Ordnance Survey data © Crown copyright and database right 2024
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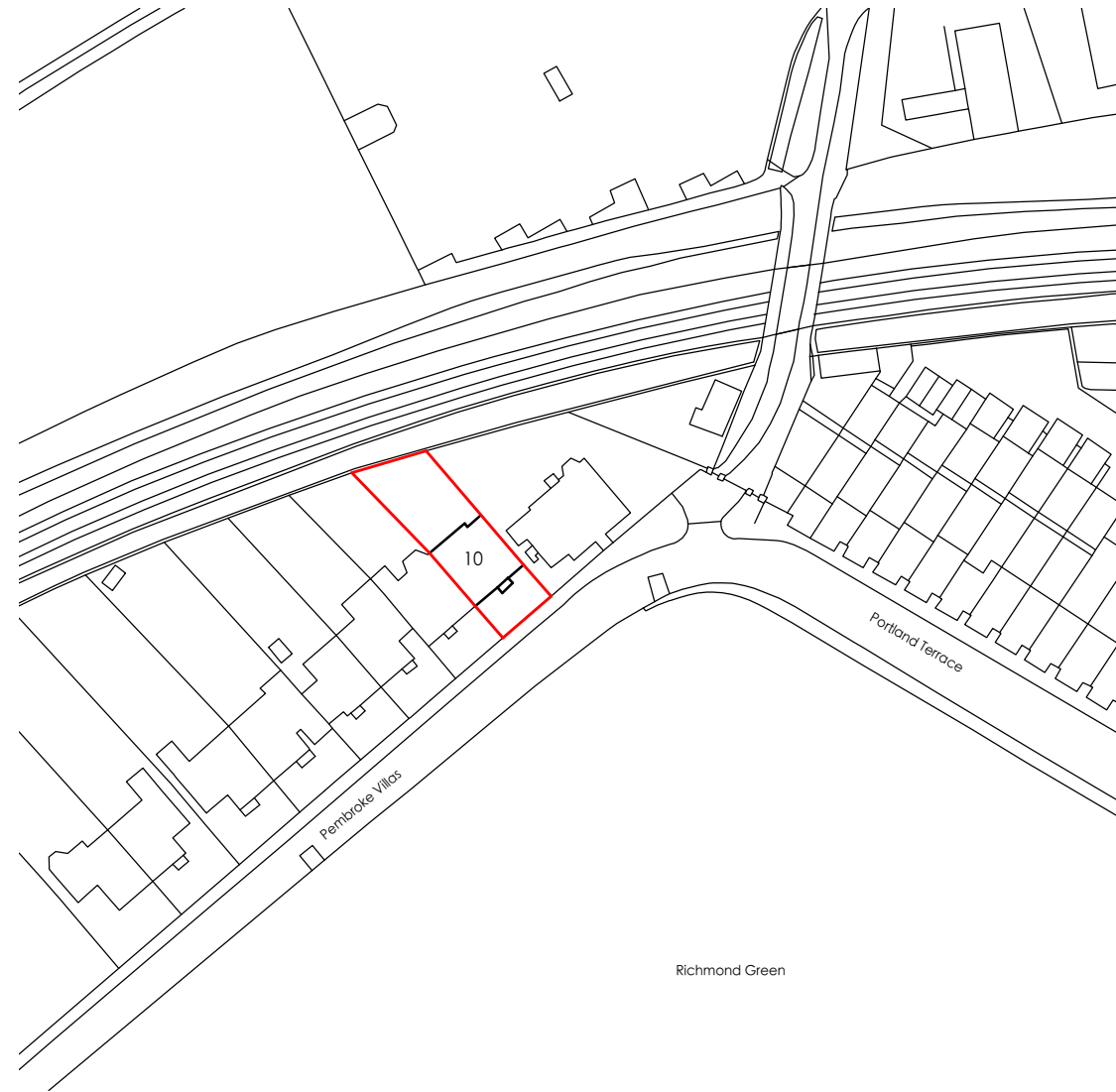
11. Appendices



Appendix A



Site plans

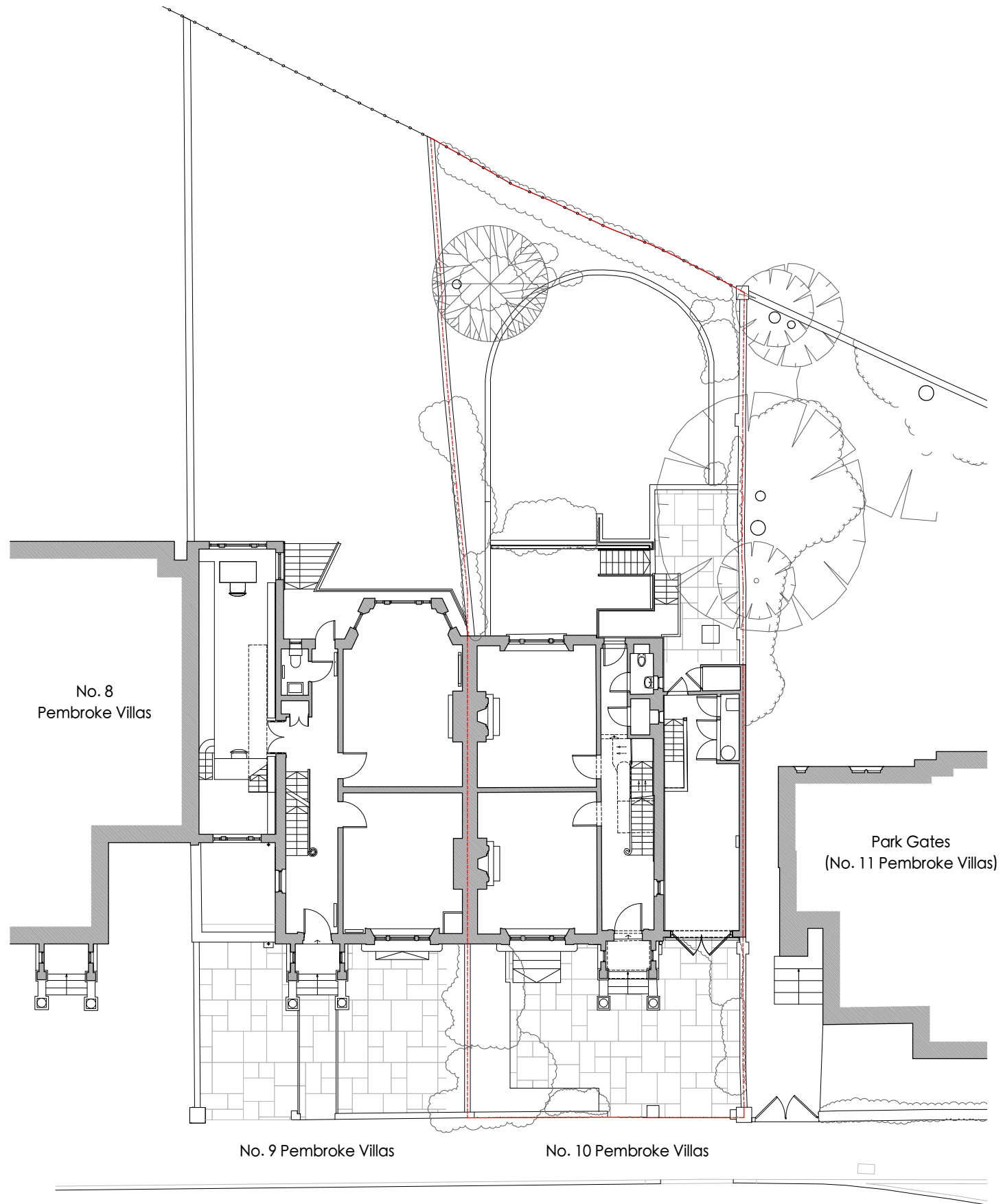


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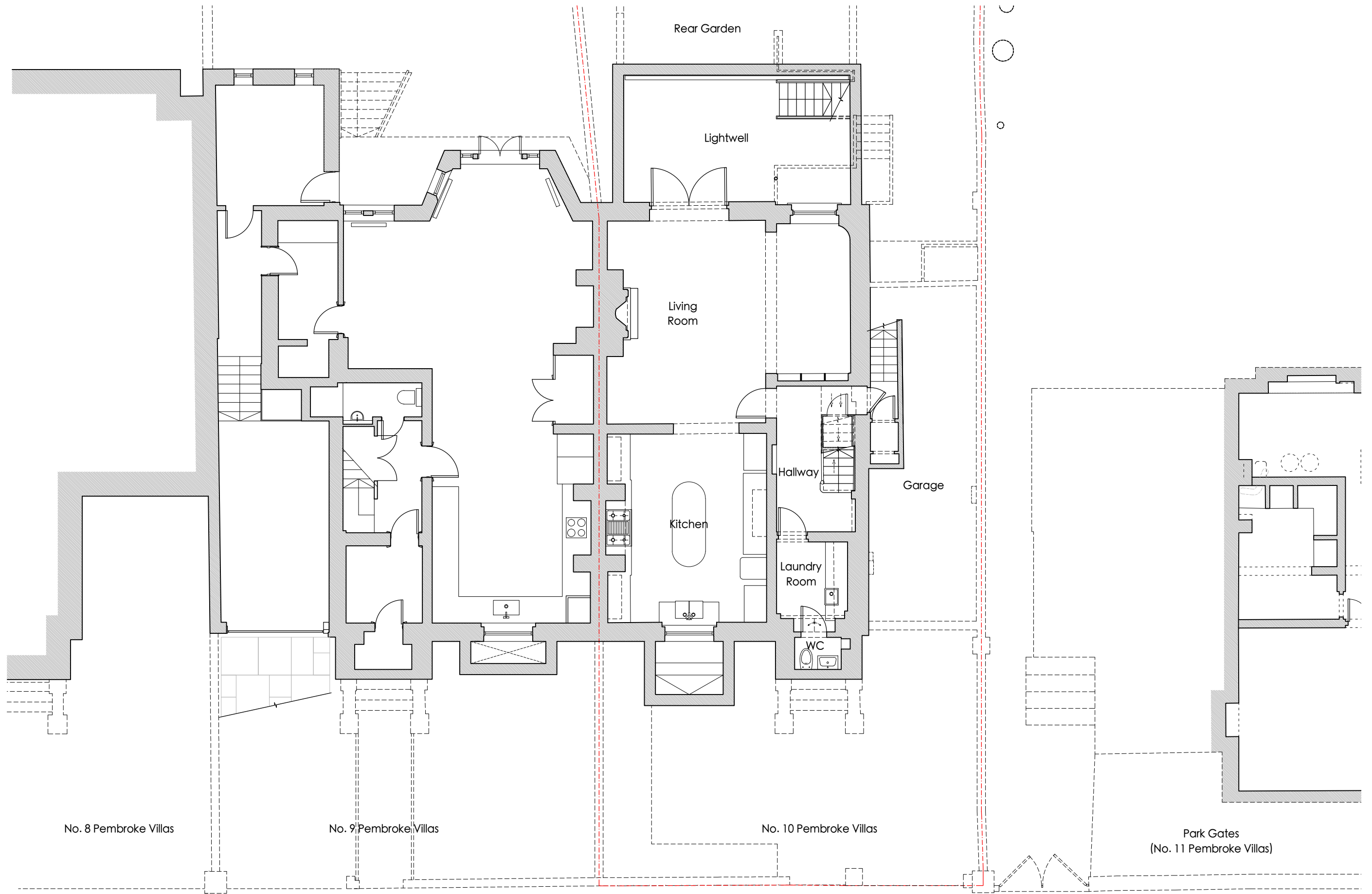
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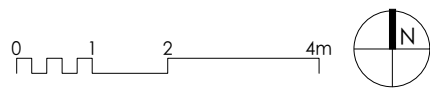
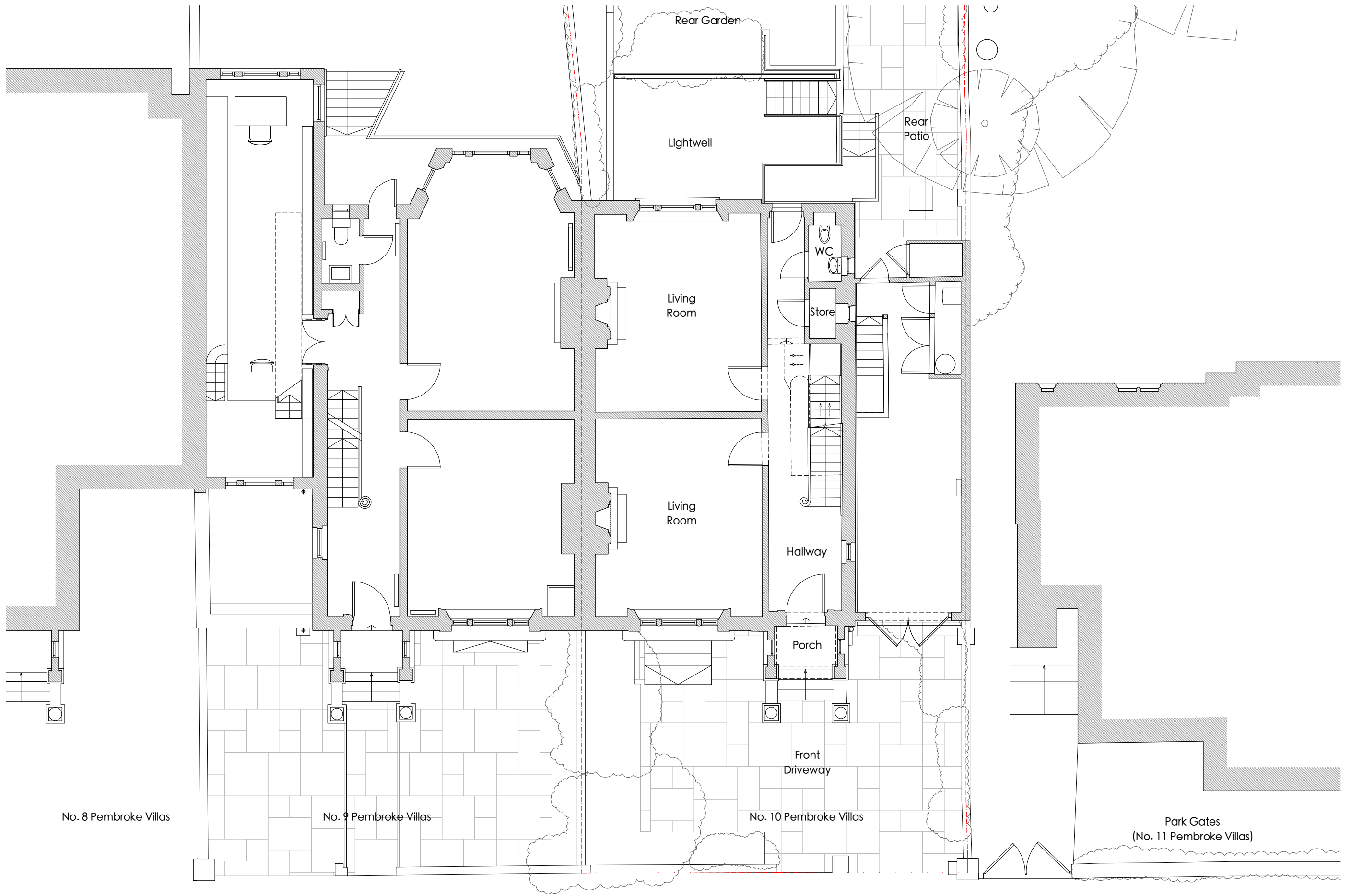
Park Gates
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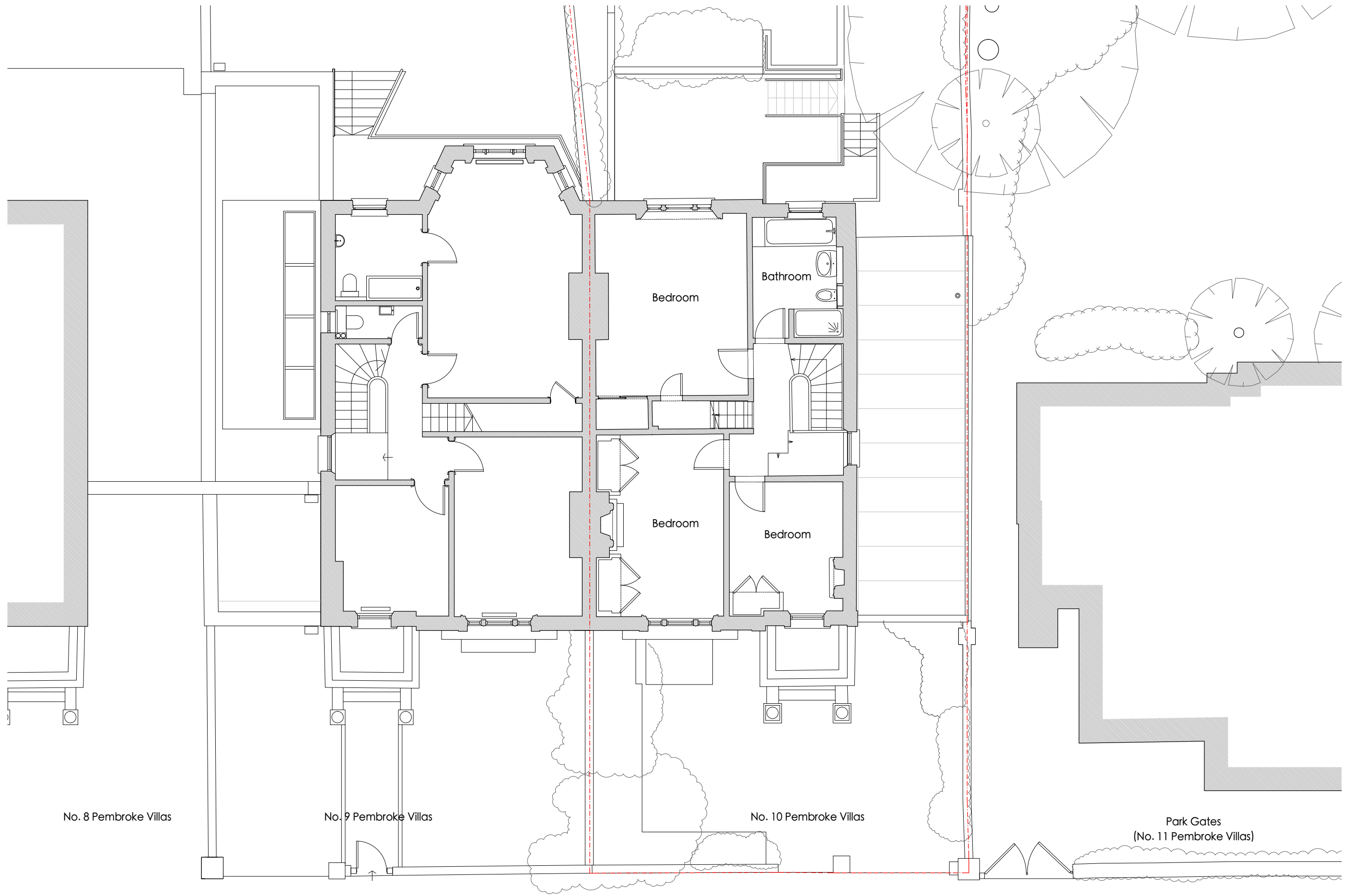


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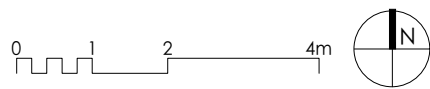


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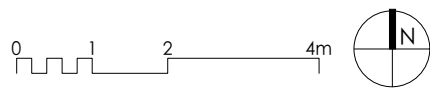
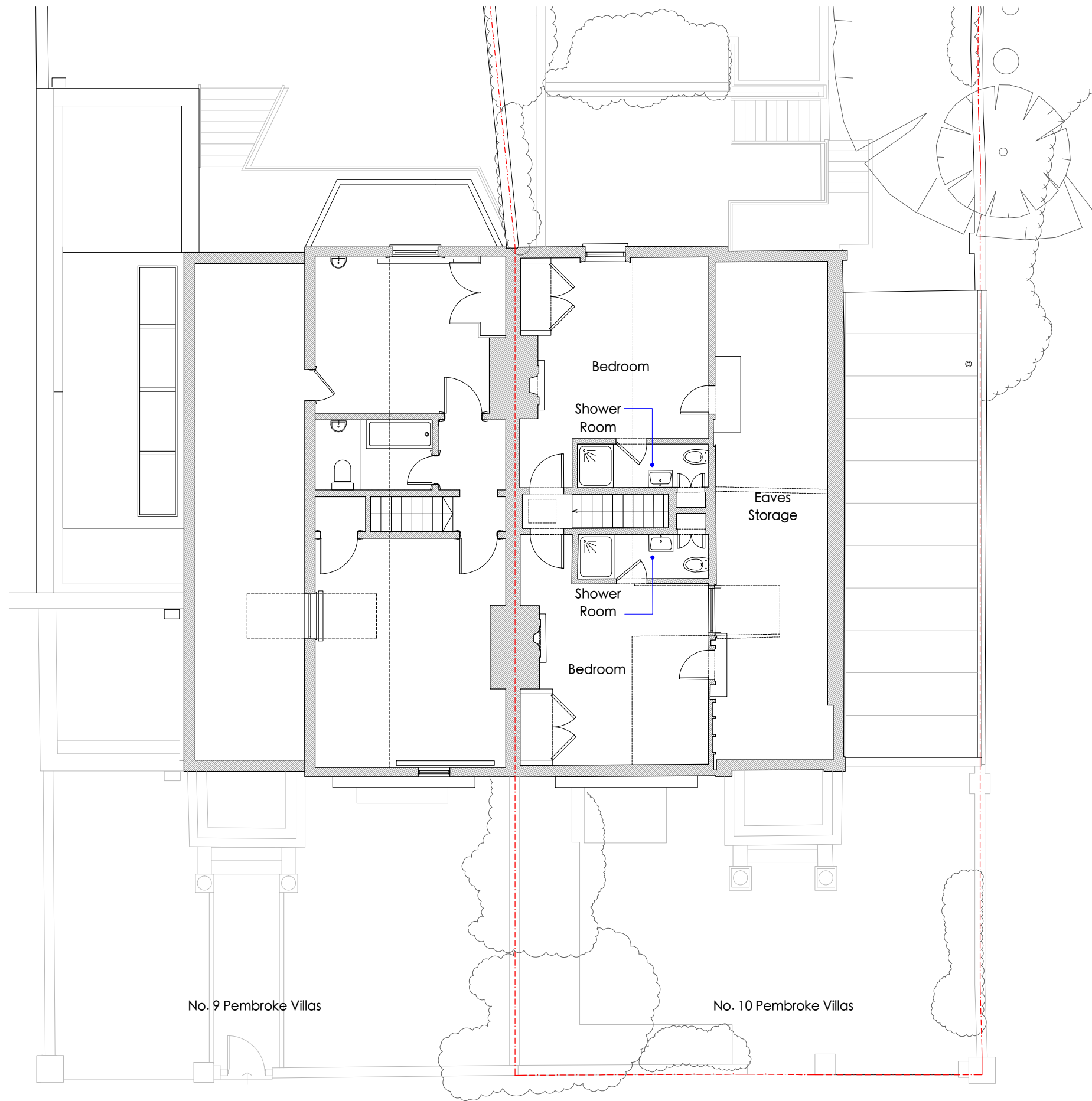


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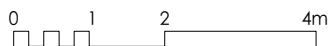
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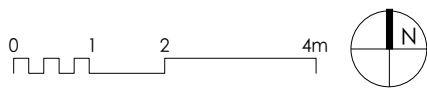


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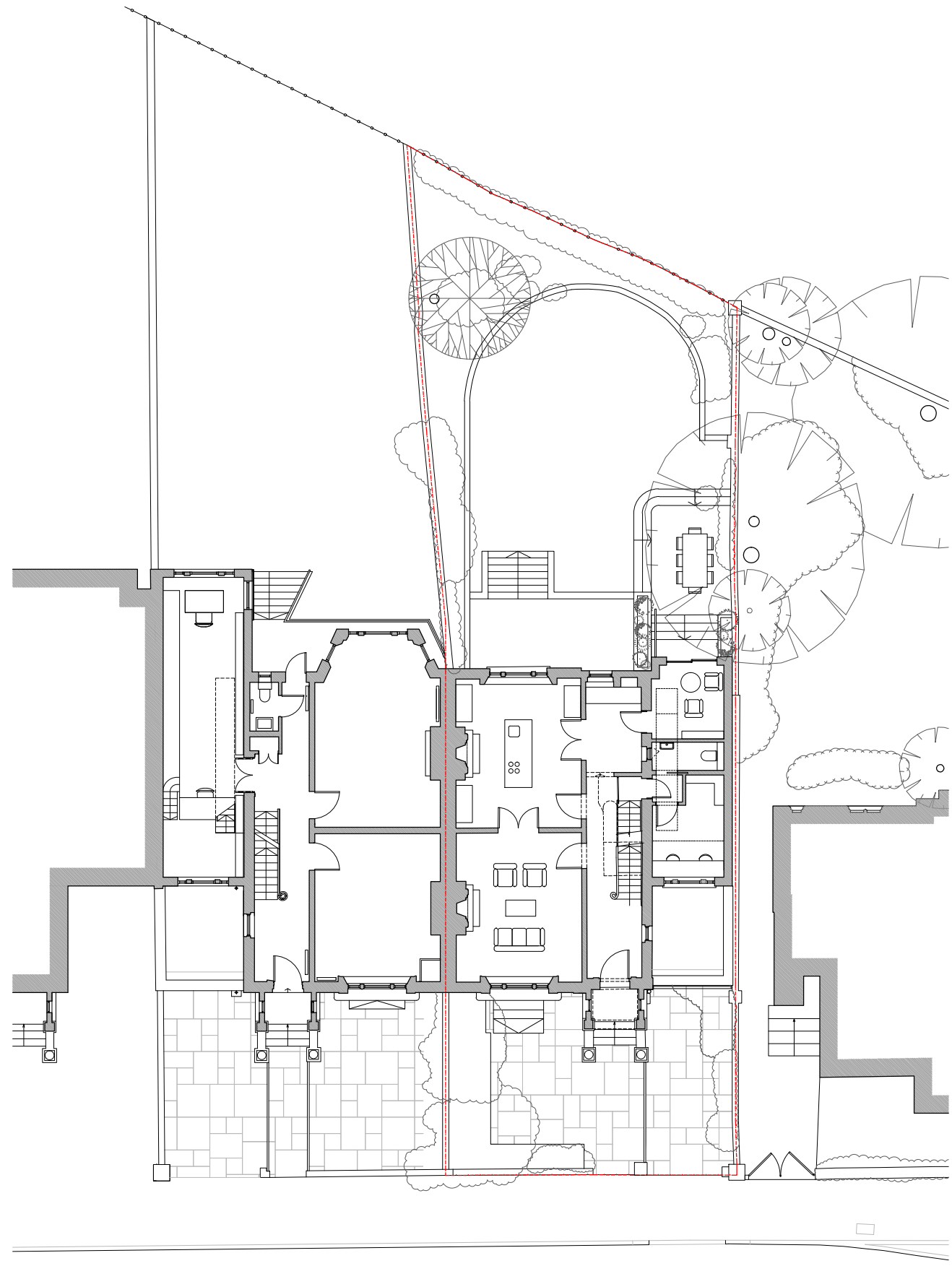
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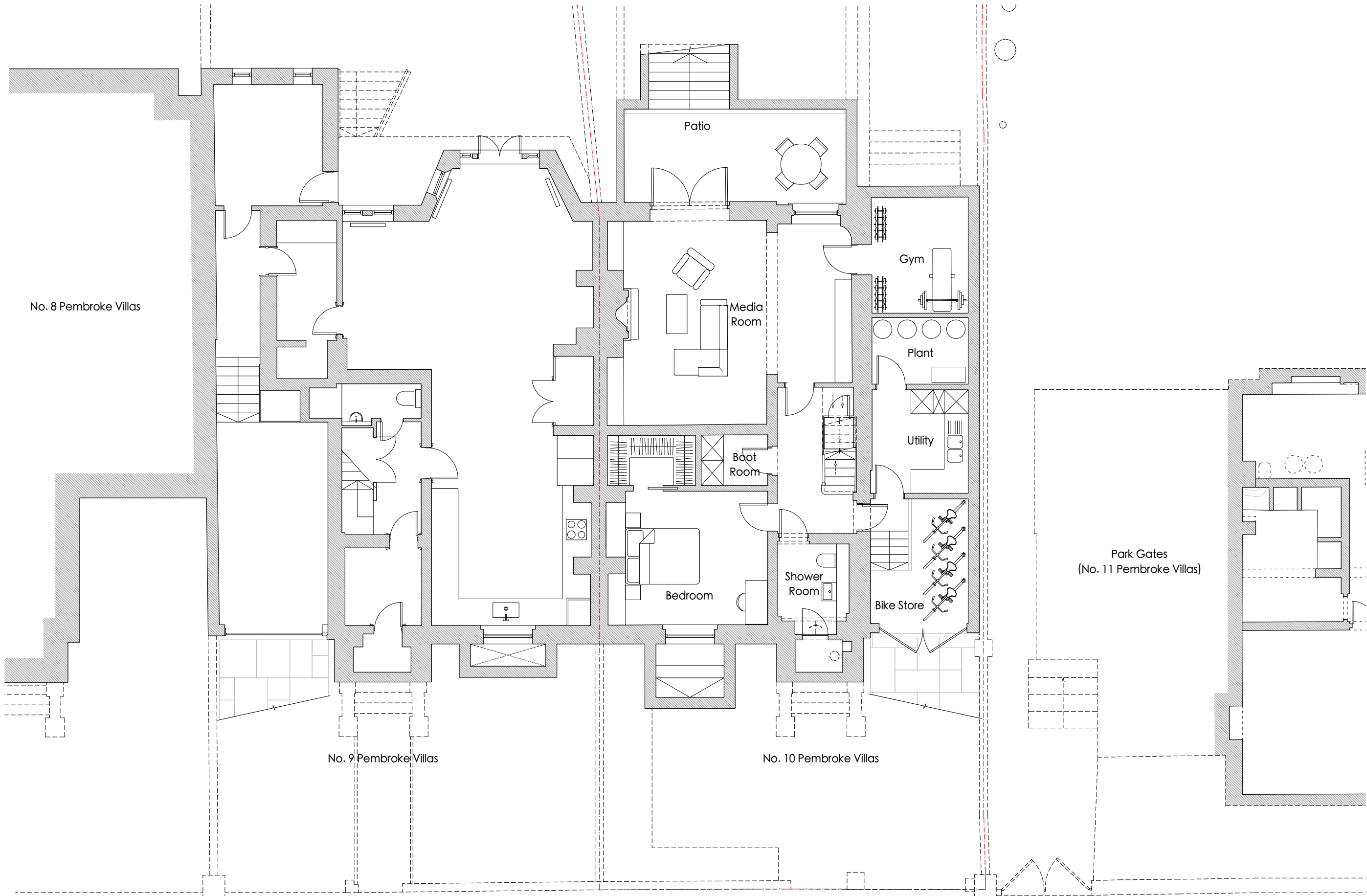


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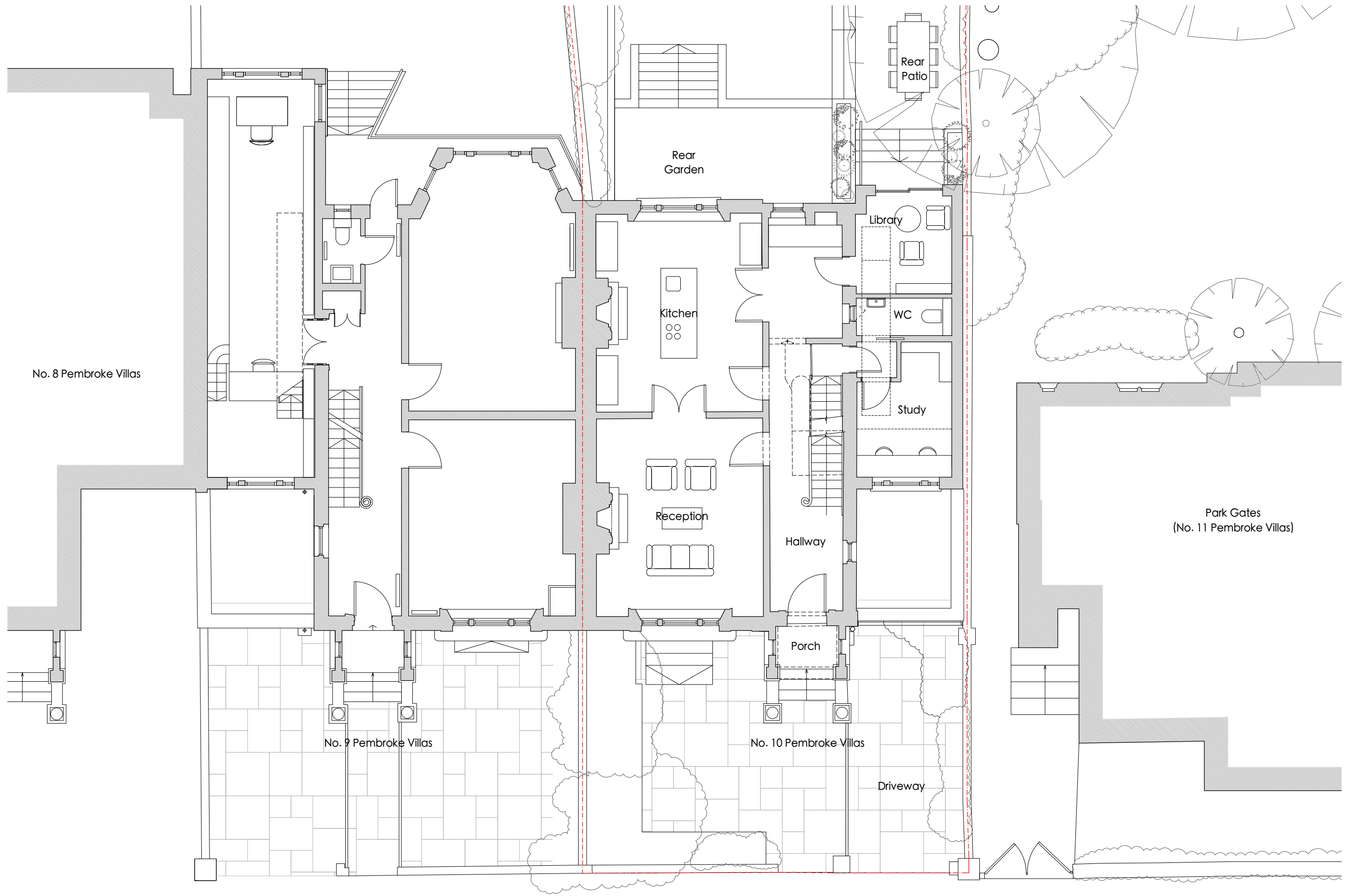
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No. 8
Pembroke Villas

Park Gates
(No. 11 Pembroke Villas)

No. 9 Pembroke Villas

No. 10 Pembroke Villas

Master
Bedroom

Bathroom

Bathroom

Bedroom



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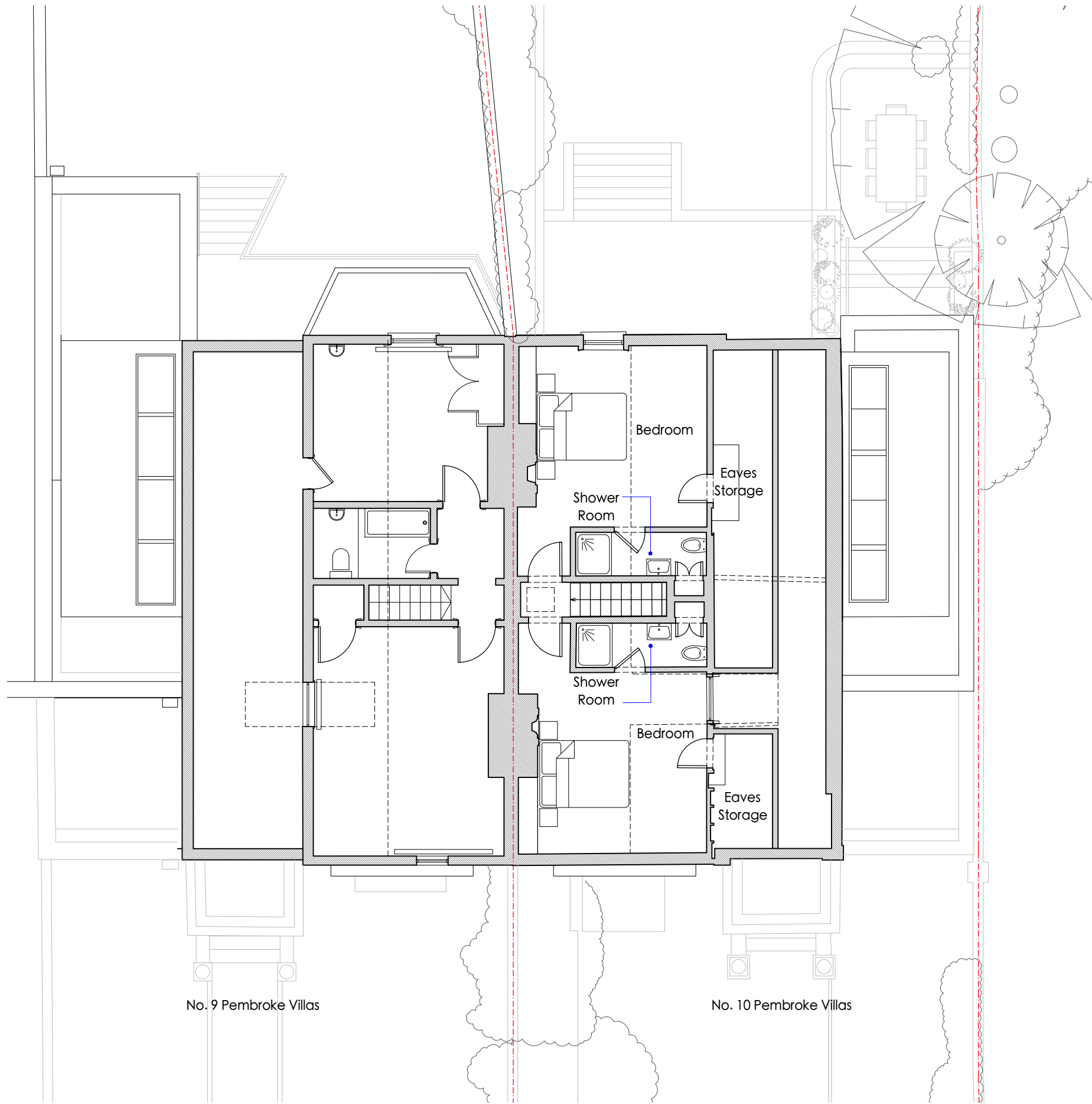
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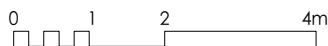
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job title

10 Pembroke Villas

client

Sarah and Colman McCarthy

drawing title

Proposed Side (E) Elevation

drawing number

2013.01.03.Exg.062

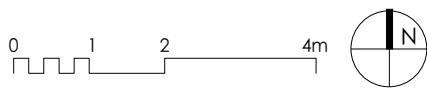
scale 1:100

date April 2024

drawn by HX

checked by IP

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job title
 10 Pembroke Villas
 client
 Sarah and Colman McCarthy

drawing title
 Proposed Rear (N) Elevation
 drawing number
 2013.01.03.Exg.061

scale 1:100
 date April 2024
 drawn by HX
 checked by IP



Environment Agency LiDAR ground elevation data

LIDAR Composite DTM sourced from the EA and NRW

Contours

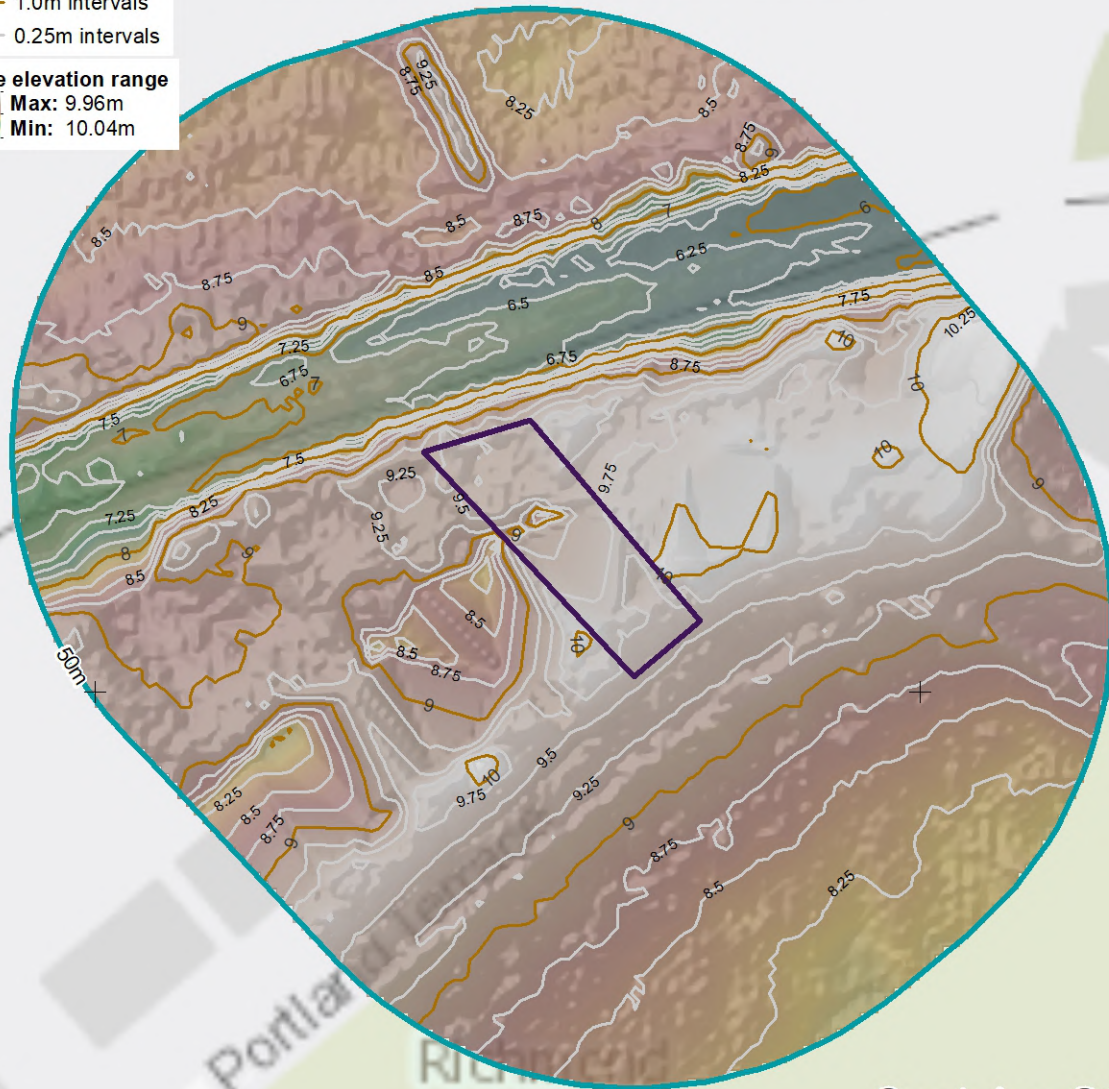
— 1.0m intervals

— 0.25m intervals

Site elevation range

Max: 9.96m

Min: 10.04m



175100

517600

Contains OS

517700

Disclaimer

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- enables consumers and property professionals to have confidence in firms which subscribe to the code, their products and services.
- By giving you this information, the search firm is confirming that they keep to the principles of the Code. This provides important protection for you.

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- conduct business in an honest, fair and professional manner.
- handle complaints speedily and fairly.
- ensure that products and services comply with industry registration rules and standards and relevant laws.
- monitor their compliance with the Code.

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If you have a query or complaint about your search, you should raise it directly with the search firm, and if appropriate ask for any complaint to be considered under their formal internal complaints procedure. If you remain dissatisfied with the firm's final response, after your complaint has been formally considered, or if the firm has exceeded the response timescales, you may refer your complaint for consideration under The Property Ombudsman scheme (TPOs). The Ombudsman can award up to £5,000 to you if the Ombudsman finds that you have suffered actual financial loss and/or aggravation, distress or inconvenience as a result of your search provider failing to keep to the Code.

Please note that all queries or complaints regarding your search should be directed to your search provider in the first instance, not to TPOs or to the PCCB.

TPOs contact details:

The Property Ombudsman scheme

Milford House

43-55 Milford Street

Salisbury

Wiltshire SP1 2BP

Tel: 01722 333306

Fax: 01722 332296

Email: admin@tpos.co.uk

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Complaints procedure

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- Acknowledge it within 5 working days of receipt.
- Normally deal with it fully and provide a final response, in writing, within 20 working days of receipt.
- Keep you informed by letter, telephone or e-mail, as you prefer, if we need more time.
- Provide a final response, in writing, at the latest within 40 working days of receipt.
- Liaise, at your request, with anyone acting formally on your behalf.

If you are not satisfied with our final response, or if we exceed the response timescales, you may refer the complaint to The Property Ombudsman scheme (TPOs): Tel: 01722 333306, E-mail: admin@tpos.co.uk.

We will co-operate fully with the Ombudsman during an investigation and comply with his final decision. Complaints should be sent to:

Martin Lucass

Commercial Director

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<http://geosmartinfo.co.uk/data-limitations/>