



FLOOD RISK ASSESSMENT

Unit 4, Winnersh Fields, Gazelle Close RG41 5QS

Reference: U0608 FRA-v1

Jan-25

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Purpose of this report

- 1.1 Urban Water has been appointed to undertake a Level 2 – Scoping Study Flood Risk Assessment for a development located at RG41 5QS.

Objectives

- 1.2 The objectives of this FRA are to demonstrate the following:
- Whether the proposed development will likely be affected by current or future flooding.
 - Whether the proposed development will increase flood risk elsewhere.
 - Whether the flood risks associated with the proposed development can be satisfactorily managed.
 - Whether the measures proposed to deal with the flood risk are sustainable.

Documents Consulted

- 1.3 To achieve these objectives, the following documents have been consulted and referenced:

The National Planning Policy Framework (NPPF)
CIRIA C753 document The SuDS Manual, 2015
Local Flood Risk Management Strategy (LFRMS)
Level 1 Strategic Flood Risk Assessment (SFRA)
Aerial photographs and topographical survey of the site
British Geological Society Records
Local Council flood Maps
Environment Agency flood maps
The CIRIA publication 'C635 Designing for exceedance in urban drainage Good practice'



Development Site and Location

- 2.1 The site is located at Gazelle Close, Sindlesham. The nearest postcode is RG41 5QS. Refer to appendix A for site location plan.
- 2.2 The current use of the site is an office building. The current user vulnerability classification of the site is Less vulnerable. The site is located in the River Flood Zone 3. Refer to Appendix B for more details.

Development Proposals

- 2.3 The proposed development includes the change of use from office to an islamic education and culture community centre. Refer to Appendix B for the layout of the proposed development.
- 2.4 The vulnerability classification of the proposed development is More vulnerable with an estimated lifetime between 50 and 100 years.

Site Hydrology and Hydrogeology

- | | | |
|------------------------|-----|---|
| Hydrology | 2.5 | The River Loddon is located approximately 430 m away from the development. |
| Aquifer | 2.6 | The development is located within a secondary aquifer type A. Aquifers type A consist of permeable layers capable of supporting water supplies at a local rather than strategic scale. They are generally aquifers formerly classified as minor aquifers. |
| Source Protection Zone | 2.7 | The site is not located within a Source Protection Zone. |
| Groundwater Levels | 2.8 | The ground water levels for this site are unknown. |

Site Geology

- | | | |
|---------|-----|--|
| Bedrock | 2.9 | The British Geological Survey records of the site show that it is located within |
|---------|-----|--|



the London Clay Formation - Clay, Silt And Sand.

Superficial Deposits 2.10 The British Geological Survey records show that the superficial deposits are River Terrace Deposits, 2 - Sand And Gravel.



National Planning Policy Framework (NPPF)

- 3.1 The NPPF and its technical guidance is a set of planning policies with the key objective of contributing to sustainable development. As part of it, they ensure that flood risk and sustainability are considered during the planning process. This ensures that developments are not located in flood risk areas and directs developments to lower risk areas. The NPPF applies a sequential risk-based approach to determining land suitability for development in flood risk areas. The NPPF also encourages developers to seek opportunities to reduce the overall level of flood risk through the development layout and the application of Sustainable Drainage Systems (SuDS).

The Flood and Water Management Act (2010)

- 3.2 The Flood and Water Management Act aims to reduce the flood risk associated with extreme weather events. It provides robust flood risk management for people, homes and businesses and encourages using SuDS for developments. A robust SuDS strategy should consider the recommendations in this Flood Risk Assessment.

Strategic Flood Risk Assessment (SFRA)

- 3.3 Planning policy with regard to development and flood risk in the area is detailed in the Strategic Flood Risk Assessment (SFRA) which was published in 2020. The proposed development site is located within the administrative boundary of the Wokingham Borough Council.
- 3.4 The SFRA commits to direct new development to locations at the lowest flood risk. The SFRA provides information on the levels and flood hazards that could result from flooding. The Environment Agency flood zone maps and the SFRA ignore the presence of existing flood defences when defining the potential extent of flooding.
- 3.5 This report follows the guidance given in the Strategic Flood Risk Assessment by evaluating the flood risk and providing relevant flood mitigation.



- 4.1 The NPPF guidance states that the sequential test "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."

Applicability of the Sequential Test

- 4.2 The flood risks were determined by identifying all the sources of flooding and assessing their possible impact and likelihood to development. It is confirmed that the development is:

- In Flood Zone 3, based on the Planning Flood Risk Map
- In Flood Zone 3a, based on the Flood Level information Provided by the Environment Agency
- At Very Low risk of surface flooding
- At high risk of groundwater flooding
- Outside of a critical drainage area
- Potentially within an area of sewer flooding

- 4.3 This type of development is exempt from applying the sequential test as per the National Planning Policy Framework paragraph 174, footnote 60. The development has been made safe and has not increased the risk to other properties. See copy of note below "(60) This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate."



Exception Test

4.4 Fluvial flood risk for this change of use was assessed using the Environment Agency Flood Zone Maps and the standing advice approach recommended in the NPPF guidelines. The standing advice considers the development's size and the flood risk vulnerability of land use.

Step 1
Flood Zone
categorisation

4.5 The proposed development falls within The Environment Agency (EA) Flood Zone 3. The Flood Zone 3 is considered to have a high probability of flooding with a 100 years or greater annual probability or >1%AEP.

Step 2
The Exception Test

4.6 The Exception Test is not required for this development.



- 5.1 The development has been assessed for the following potential flood risks, river and tidal flood risk, surface water flooding, flooding from groundwater, reservoir flood risk and drainage systems.

Flood Defence and Historic Flooding

- 5.2 The Environment Agency records show that the site does not benefit from flood defences. They also show that the area around the site has not been flooded in the past. See Appendix C for details.

Flooding from river and sea

- 5.3 The site is affected by River Flooding. The proposed development falls within The Environment Agency (EA) Flood Zone 3. The Flood Zone 3 is considered to have a high probability of flooding with a 100 years or greater annual probability or >1%AEP.
- 5.4 The climate change allowance has been taken from the EA peak river flow map. The vulnerability of the development, the design life of the building, and the flood zone classification were used to determine it. The climate change allowance for this site is 14%. The nearest climate change allowance of 20% provided by the EA was used as the most representative to complete this assessment.
- 5.5 The levels provided by the Environment Agency are shown in table 1 below. Further details are provided in Appendix D.

Flood levels in channel

Return Period	Flood Level (m AOD)
1 in 20 (5%)	38.41
1 in 50 (2%)	39
1 in 100 (1%)	39.07
1 in 100 + 20%(CC)	39.28
1 in 1000 (0.1%)	39.86

Flood levels at Site

Return Period	Flood Level (m AOD)
1 in 20 (5%)	NIL
1 in 50 (2%)	39.0238
1 in 100 (1%)	39.1267
1 in 100 + 20%(CC)	39.3361
1 in 1000 (0.1%)	39.9073



- 5.6 The river flood risk level is 39.34m AOD. The external depth of water is 0.14m.

Surface water (overland flows) flood risk

- 5.7 The Environment Agency maps show that the flood risk from surface water is very low. A residual risk of localised ponding remains unlikely. The Environment Agency surface water flood risk maps are defined by applying a specific procedure based on digital terrain models and assumptions regarding infiltration and urban drainage losses. The surface water flood maps are determined by the Environment Agency as follows:

- 5.8 *"The nationally produced surface water flood mapping only indicates where surface water flooding could occur due to local rainfall. It does not fully represent flooding that occurs from:*

- Ordinary watercourses
- Drainage systems or public sewers caused by catchment-wide rainfall events
- Rivers
- Groundwater

Due to the modelling techniques, the mapping picks out depressions in the ground surface. It simulates some flow along natural drainage channels, rivers, low areas in floodplains, and flow paths between buildings. Although the maps appear to show flooding from ordinary watercourses, they should not be taken as definitive mapping of flood risk from these as the conveyance effect of ordinary watercourses or drainage channels is not explicitly modelled. Also, structures (such as bridges, culverts and weirs) and flood risk management infrastructure (such as defences) are not represented.

The nationally produced surface water flood mapping does not consider the effect of pumping stations in catchments with pumped drainage. No allowance is made for tide locking, high tidal or fluvial levels where sewers cannot discharge into rivers or the sea."

- 5.9 The strategic flood risk for the Wokingham Borough Council confirms that the flood risk for the site is Very Low.
- 5.10 Based on the Environment Agency and the Strategic flood risk assessment's surface water mapping, together with the presence of surface water drainage systems at the site and surrounding area, it is concluded that the site is at Very



Low risk of flooding from surface water sources.

Flooding from drainage systems in adjacent areas

- 5.11 The area around the development is shown as having a high level of sewer incident within the flood maps of the Strategic Flood Risk Assessment. See appendix C for details.

Reservoirs Risks

- 5.12 The Reservoir Flood Map (RFM) produced by the Environment Agency does not show the risk to individual properties of dam breach flooding. The maps do not indicate or relate to any particular probability of dam breach flooding. The maps were prepared for emergency planning purposes. They can be used to help reservoir owners produce on-site plans, and the Local Resilience Forum produce off-site plans and to prioritise areas for evacuation/early warning in the event of a potential dam failure. The RFM shows that the development could be within the possible dam breach flooding path. See Appendix C.

Groundwater flood risk

- 5.13 The British Geological Survey's flood risk susceptibility maps show that the development has the potential for groundwater flooding above ground level. Groundwater levels vary seasonally and are influenced by ground and meteorological conditions and proximity to water features. The groundwater flooding risk for this site is considered to be high. The groundwater flood depth could potentially be 0.15m. The average external level at the site is 39.05m AOD. The potential groundwater flood level is 39.2m AOD. This level has been given as a precautionary measure. It is recommended that monitoring of groundwater is undertaken should this measure be reviewed. Refer to Appendix C for record drawings.

Critical Drainage Areas



5.14 The development does not fall within a critical drainage area.



6.1 The Flood hazard assessment has demonstrated that the site is:

- In Flood Zone 3, based on the Planning Flood Risk Map
- In Flood Zone 3a, based on the Flood Level information Provided by the Environment Agency
- At Very Low risk of surface flooding
- At high risk of groundwater flooding
- Outside of a critical drainage area
- Potentially within an area of sewer flooding

6.2 Under the NPPF it is necessary to demonstrate that, for any new development on the site, it is possible to provide an adequate level of flood protection for personnel working or living at the development.

Design Flood Level

6.3 The design flood level is the maximum estimated water level during the design storm event including an allowance for climate change in line with current best practice and the national planning policy guidance.

6.4 The Design Flood Level for this development has been determined by evaluating the levels from the Fluvial/Sea, Surface Water and Groundwater flood levels.

6.5 For this site, the Design Flood Level is 39.34m AOD. This is the highest level and corresponds to the River/Sea Flood Level.

Flood Protection

6.6 The National Planning Guidance standing advice and Environment Agency recommends that where possible, flood avoidance is provided by establishing the development's finished floor level 600mm above (freeboard) the design flood level. However, this level can be reduced if there is a high level of certainty about the estimated flood level. For this site the estimated free board has been determined to be 0.3m above the Design Flood Level due to the quality of the flood risk information



available and the type of risk. The finished floor should be 39.64m AOD. It would involve a height differential of 0.44m. This is the distance between the average external level (39.2m AOD) and the potential Finished Floor Level.

6.7 As this proposal is for a change of use, it is not possible to achieve this FFL due to access and site constraints. A level of 39.35m AOD is achieved.

6.8 As this proposal is for a change of use, there are no opportunities to implement protection measures. The FFL is still above the Design Flood Level and the site is only affected by the freeboard.

6.9 It is not possible to increase the FFL to avoid potential groundwater intrusion fully. The following interventions are proposed.

- Flow paths are provided around the proposed development, which groundwater will take in the event of groundwater emergence.
- It is proposed to add a tanking membrane up to 300mm above the ground level.
- It is proposed that new slabs be made of concrete and fully sealed.

6.17 The site is within an area of sewer flooding. The following recommendation should be followed:

- All new connections to the sewer network should have non-return valves.



7.1 The NPPF specifically stipulates that consideration should be given to potential off-site flood impacts of any proposed development. These off-site impacts are in relation to the following:

- Surface water management
- Flood flow conveyance, storage and climate change

Surface Water Management

7.2 The development is not increasing the surface water run-off as this is a change of use in which no extensions or changes to the external areas are proposed. It is concluded that the proposed development does not increase the off-site impact.

Flood Flow conveyance and storage

7.5 Due to the size of the development and its location in the flood zone, flood compensation for this development is not required.

7.6 The proposed development will not affect flood flow conveyance through the site or the surrounding area. It is concluded that there will be no impact on flood risk in the surrounding area.



- 8.1 This flood risk assessment has identified the potential flooding mechanisms that could affect the site. As part of this, the following residual risks have been evaluated.

Public safety and Site Access

- 8.2 This assessment has demonstrated that the proposed development will have no adverse impact on flood risk in the area surrounding the site. Available evidence indicates that the development would not change surface water generation. Therefore, there is no basis to indicate that, with respect to flood risk, the proposed development would adversely impact public safety.
- 8.3 It will be necessary to ensure that all building users are fully informed of procedures to be implemented during the threat of imminent flooding.

Flood Warning and evacuation

- 8.4 The site is located within an area covered by the Environment Agency Flood Alert service. It is recommended that the users of the proposed development are registered with this service to receive early warning of imminent flooding.
- 8.5 The occupants of the site are encouraged to sign up for the alerts. The Table 4 below shows the actions that must be taken for each flood warning.
- 8.6 Action to be taken in the event of an Alarm being Raised or a Flood Warning Received:
- Raise the alarm and evacuate the site following the established Fire Drill procedures. The main assembly is as per the main house fire drill assembly point.
 - Contact Emergency Fire Services (999) if necessary and Environment Agency Floodline: (0845 988 1188) if the event is unexpected.
 - If safe to do so, locate and turn off critical services, e.g. water, gas & electricity.
 - Follow the routes below to evacuate the site altogether.



Actions that will be taken for each flood warning

Warning	Message	Timing	Action
 FLOOD ALERT	Flooding is possible. Be prepared.	2 hours to 2 days in advance of flooding.	- Be prepared for flooding. - Prepare a flood kit.
 FLOOD WARNING	Flooding is expected. Immediate action required.	Half an hour to 1 day in advance of flooding.	- Act now to protect your property. - Block doors with flood boards or sandbags and cover airbricks and other ventilation holes. - Move pets and valuables to a safe place. - Keep a flood kit ready. - Move any critical equipment and information to a safe location
 SEVERE FLOOD WARNING	Severe flooding. Danger to life.	When flooding poses a significant threat to life and different actions are required.	- Be ready should you need to evacuate from the property. - Co-operate with the emergency services and call 999 if you are in immediate danger.
Warning Removed	No further flooding is currently expected for your area.	Issued when a flood warning is no longer in force.	- Flood water may still be around and could be contaminated. - If you've been flooded, ring your buildings and contents insurance company as soon as possible.

Useful local phone numbers

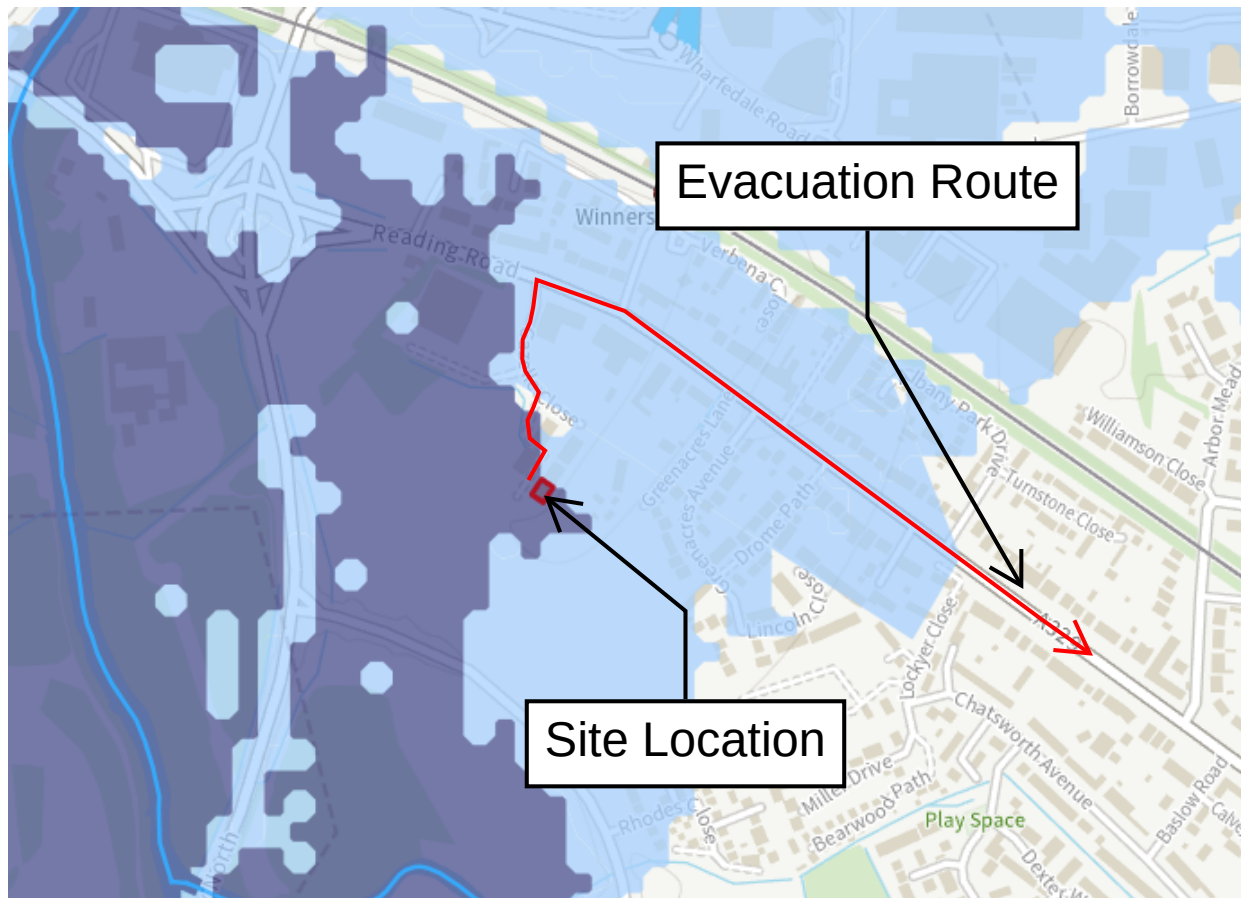
Please write your local phone numbers in the space provided below. Make sure they are easy to find in the event of a flood.

	Local authority:
	Local police:
	Gas and electricity company:
	Insurance company and policy details:
	Doctor:
	Pharmacy:
	Electrician:
	Gas safe engineer:
	Plumber:
	Builder:



- 8.7 The proposed evacuation route below shows how the development could be evacuated before the 1 in 1000 or 0.1% annual probability of flooding extreme flood occurs. Safe egress is achievable by following Gazelle Close up to Reading Road, and taking Reading Road eastbound for approximately 750m which is shown to be beyond the extent of flooding. See figure below for details.

Evacuation Route



- 9.1 It is concluded that subject to the proposed mitigation measures, the site can be developed in accordance with the provisions of the NPPF and the requirements of the Environment Agency and the local planning authority.
- 9.2 This report demonstrates that the proposal will be safe, in terms of flood risk, for its design life and will not increase the flood risk elsewhere.
- 9.3 It is proposed that a formal Flood Warning and Emergency Response Plan is developed for the proposed development to communicate flood emergency response procedures to all the occupants of the site.

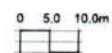




Appendix A

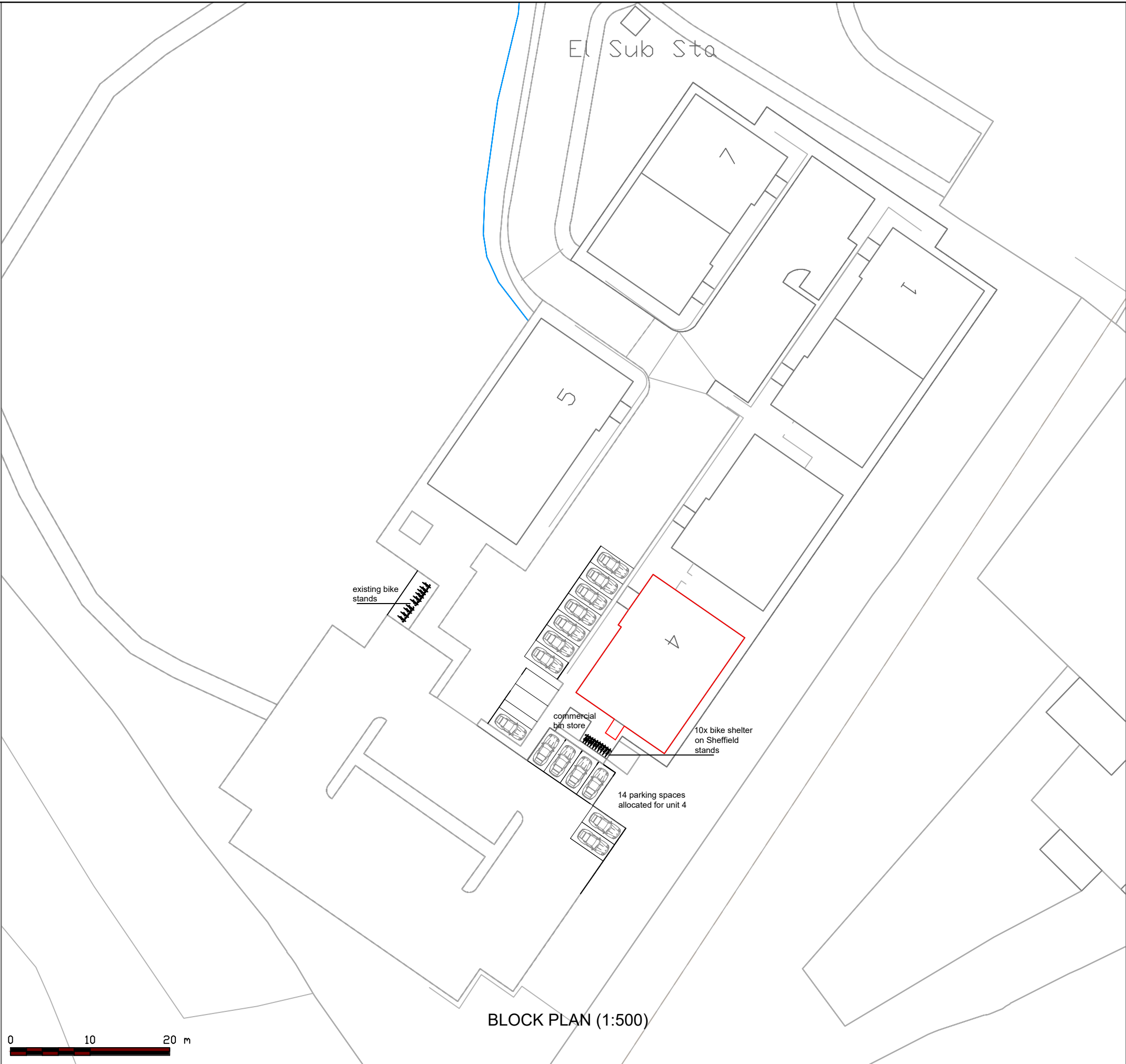


LOCATION PLAN 1:1250@A3





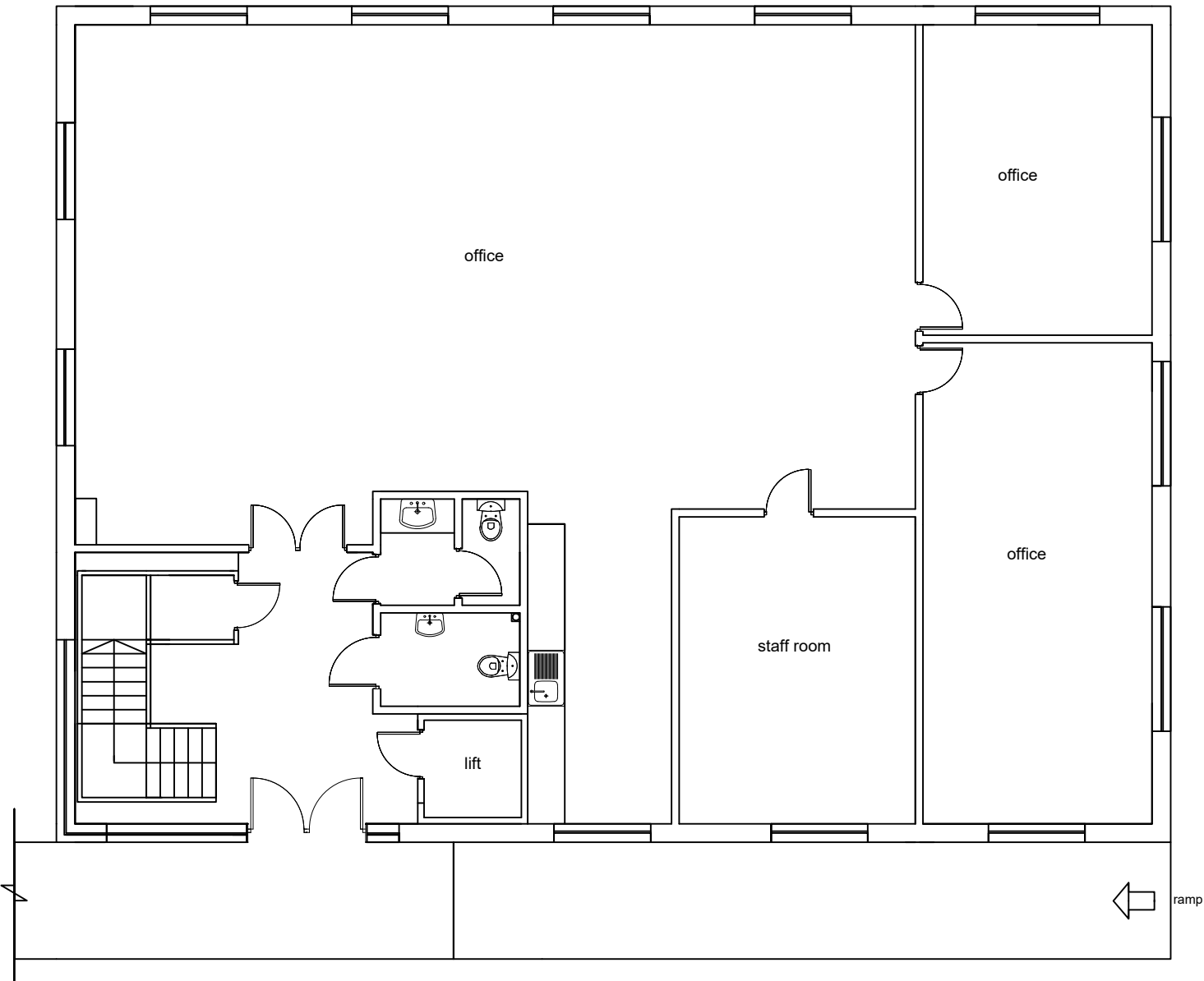
Appendix B



M C S DESIGN Architectural Services Millennium Creative Services Design RIVENDELL, 8A PRIORY LANE, BRACKNELL, RG42 2JU mob: 07989319224 tel: 0333 006 5529 fax: 0333 006 5529 email: info@mcsdesignservices.co.uk www.mcsdesignservices.co.uk client: MR. YAQOOB CHAUDHARY	
site: 4 Winnersh Fields, Gazelle Close, Winnersh, RG41 5QS	
project: CHANGE OF USE ROM OFFICE TO AN ISLAMIC EDUCATION AND CULTURE COMMUNITY CENTRE	
title: BLOCK PLAN	
status: FULL PLANNING APPLICATION	
drawing number: CHAUDHARY/PLAN/005	
scale: 1:500 @ A3	drawn Kaleem Janjua B.Arch.
date: 31st December 2024	revision

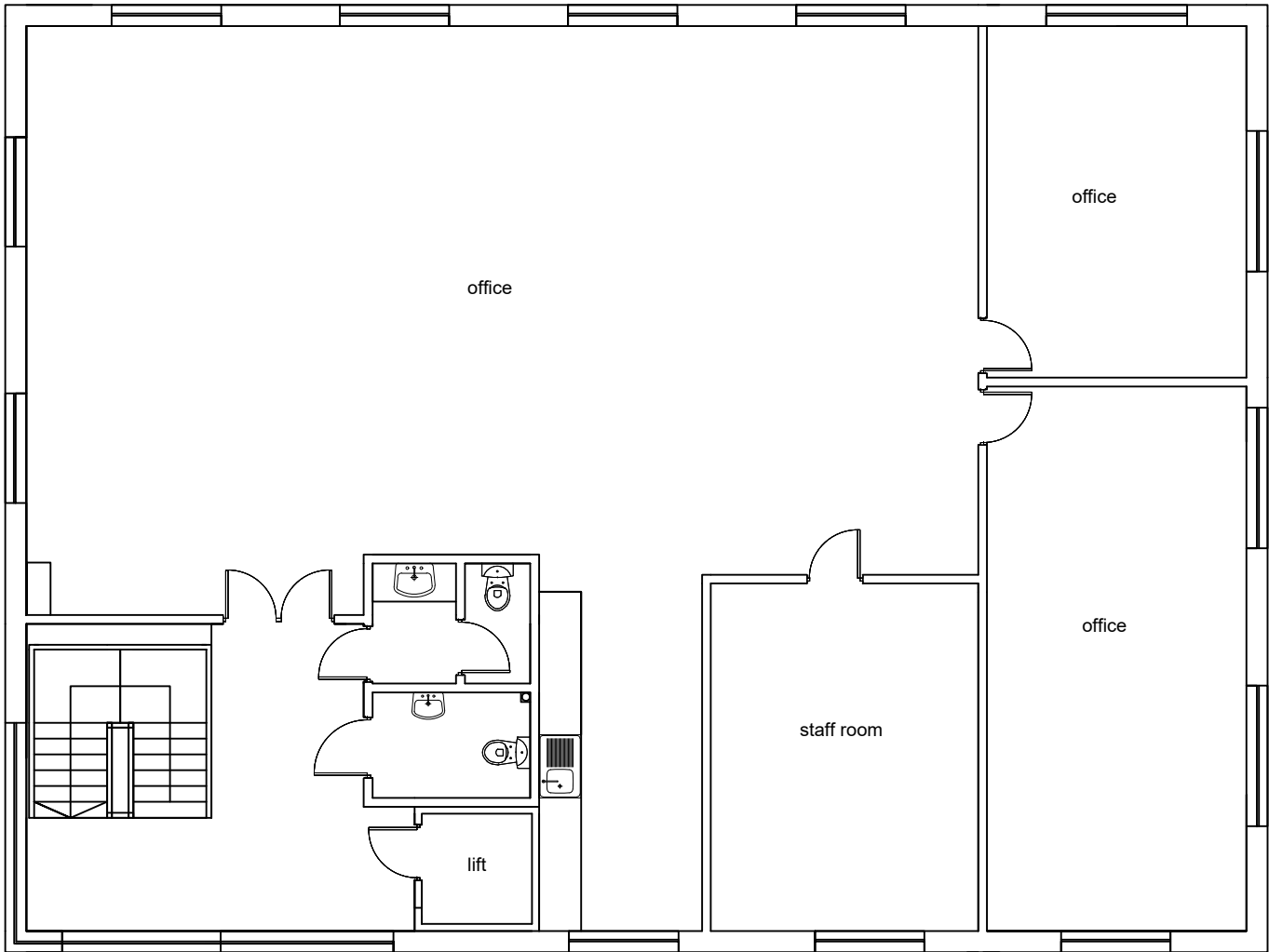


SCALE - 1 : 100.



EXISTING GROUND FLOOR PLAN

M C S DESIGN Architectural Services Millennium Creative Services Design RIVENDELL, 8A PRIORY LANE, BRACKNELL, RG42 2JU	
mob: 07989319224 tel: 0333 006 5529 fax: 0333 006 5529 email: info@mcsdesignservices.co.uk www.mcsdesignservices.co.uk	
client: MR. YAQOOB CHAUDHARY	
site: 4 Winnersh Fields, Gazelle Close, Winnersh, RG41 5QS	
project: CHANGE OF USE ROM OFFICE TO AN ISLAMIC EDUCATION AND CULTURE COMMUNITY CENTRE	
title: EXISTING GROUND FLOOR PLAN	
status: FULL PLANNING APPLICATION	
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scale: 1:100 @ A3	drawn Kaleem Janjua B.Arch.
date: 31st December 2024	revision

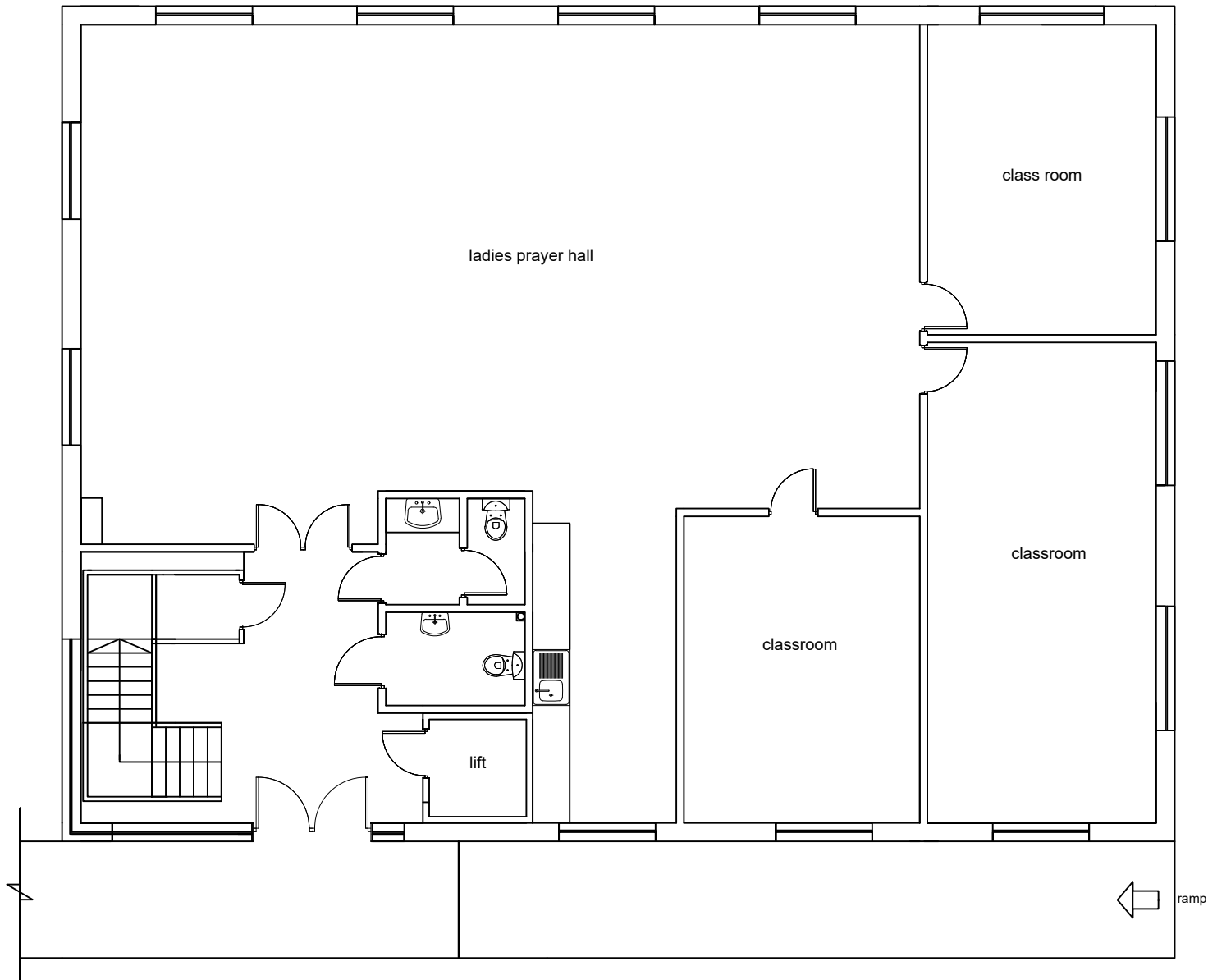


EXISTING FIRST FLOOR PLAN

M C S DESIGN Architectural Services Millennium Creative Services Design RIVENDELL, 8A PRIORY LANE, BRACKNELL, RG42 2JU mob: 07989319224 tel: 0333 006 5529 fax: 0333 006 5529 email: info@mcsdesignservices.co.uk www.mcsdesignservices.co.uk	
client: MR. YAQOOB CHAUDHARY	
site: 4 Winnersh Fields, Gazelle Close, Winnersh, RG41 5QS	
project: CHANGE OF USE ROM OFFICE TO AN ISLAMIC EDUCATION AND CULTURE COMMUNITY CENTRE	
title: EXISTING FIRST FLOOR PLAN	
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date: 31st December 2024	revision

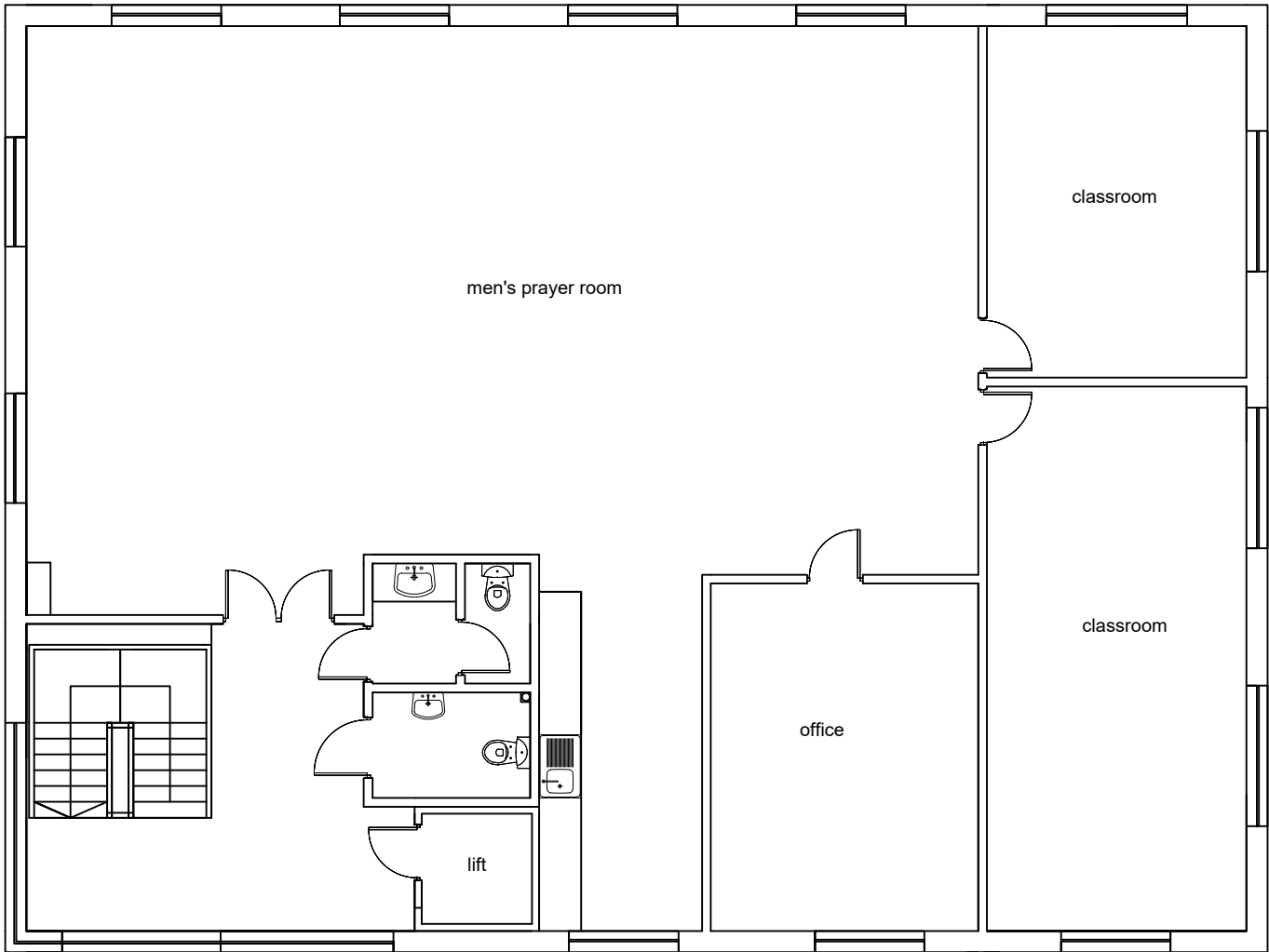


SCALE - 1 : 100.



PROPOSED GROUND FLOOR PLAN

M C S DESIGN Architectural Services Millennium Creative Services Design RIVENDELL, 8A PRIORY LANE, BRACKNELL, RG42 2JU mob: 07989319224 tel: 0333 006 5529 fax: 0333 006 5529 email: info@mcsdesignservices.co.uk www.mcsdesignservices.co.uk	
client: MR. YAQOOB CHAUDHARY	
site: 4 Winnersh Fields, Gazelle Close, Winnersh, RG41 5QS	
project: CHANGE OF USE ROM OFFICE TO AN ISLAMIC EDUCATION AND CULTURE COMMUNITY CENTRE	
title: PROPOSED GROUND FLOOR PLAN	
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date: 31st December 2024	revision



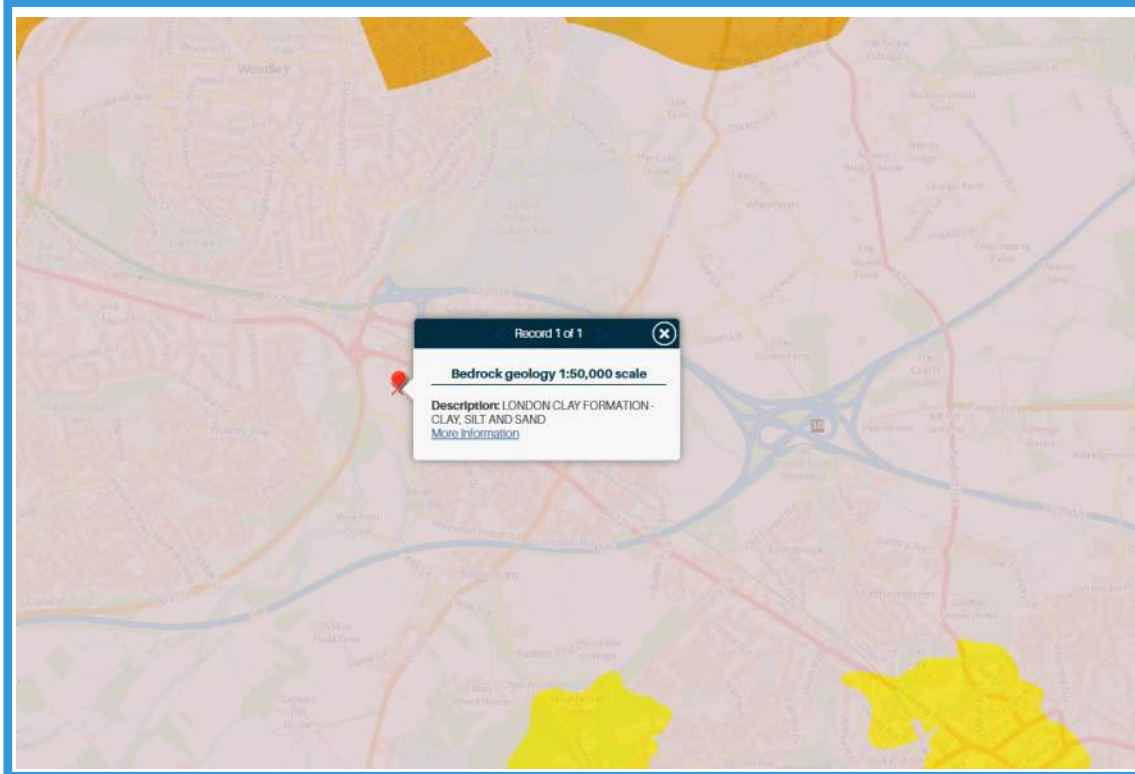
PROPOSED FIRST FLOOR PLAN

M C S DESIGN Architectural Services Millennium Creative Services Design RIVENDELL, 8A PRIORY LANE, BRACKNELL, RG42 2JU	
mob: 07989319224 tel: 0333 006 5529 fax: 0333 006 5529 email: info@mcsdesignservices.co.uk www.mcsdesignservices.co.uk	
client: MR. YAQOOB CHAUDHARY	
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project: CHANGE OF USE ROM OFFICE TO AN ISLAMIC EDUCATION AND CULTURE COMMUNITY CENTRE	
title: PROPOSED FIRST FLOOR PLAN	
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date: 31st December 2024	revision

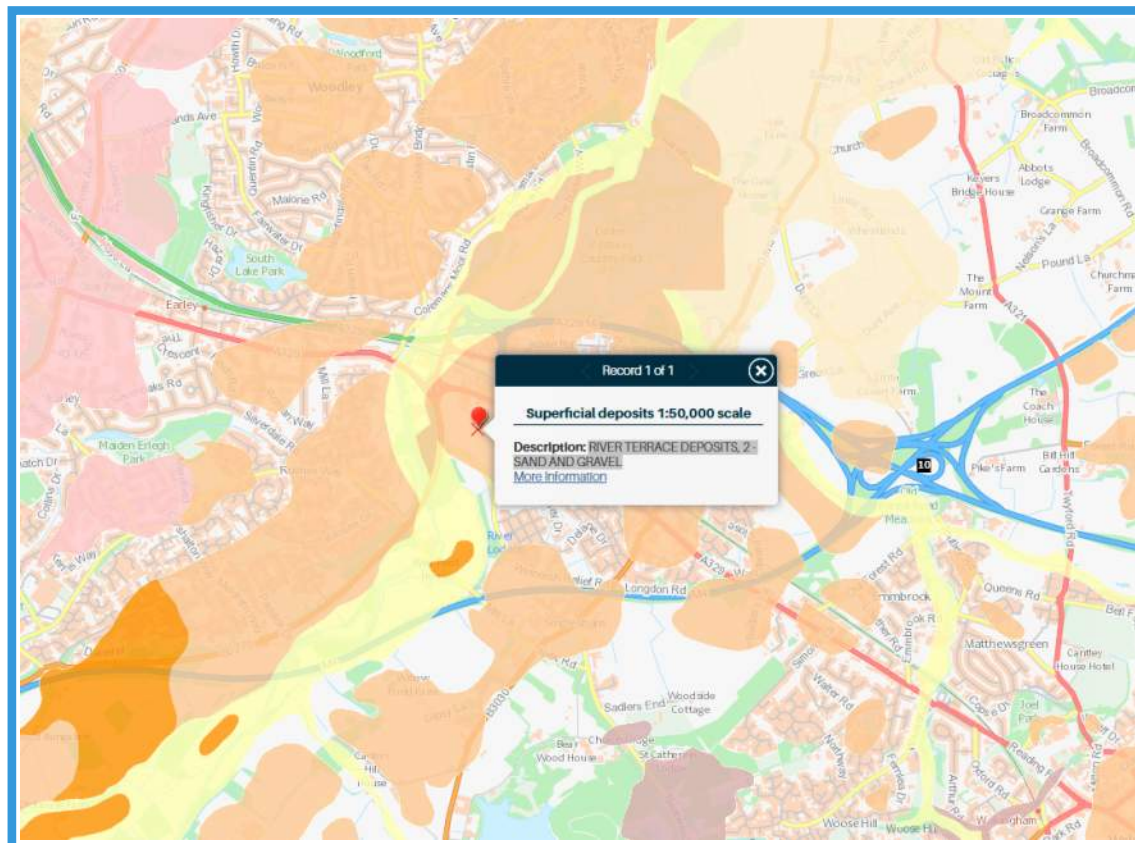
Appendix C

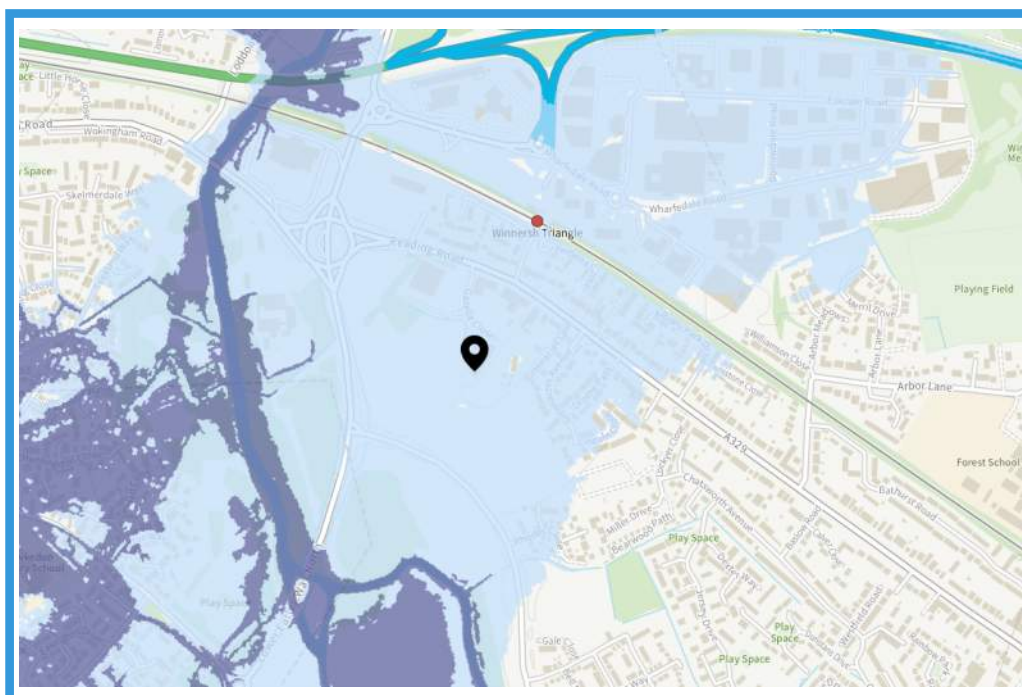
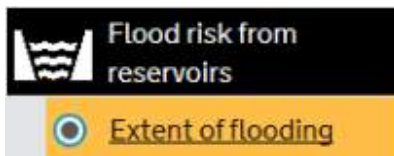
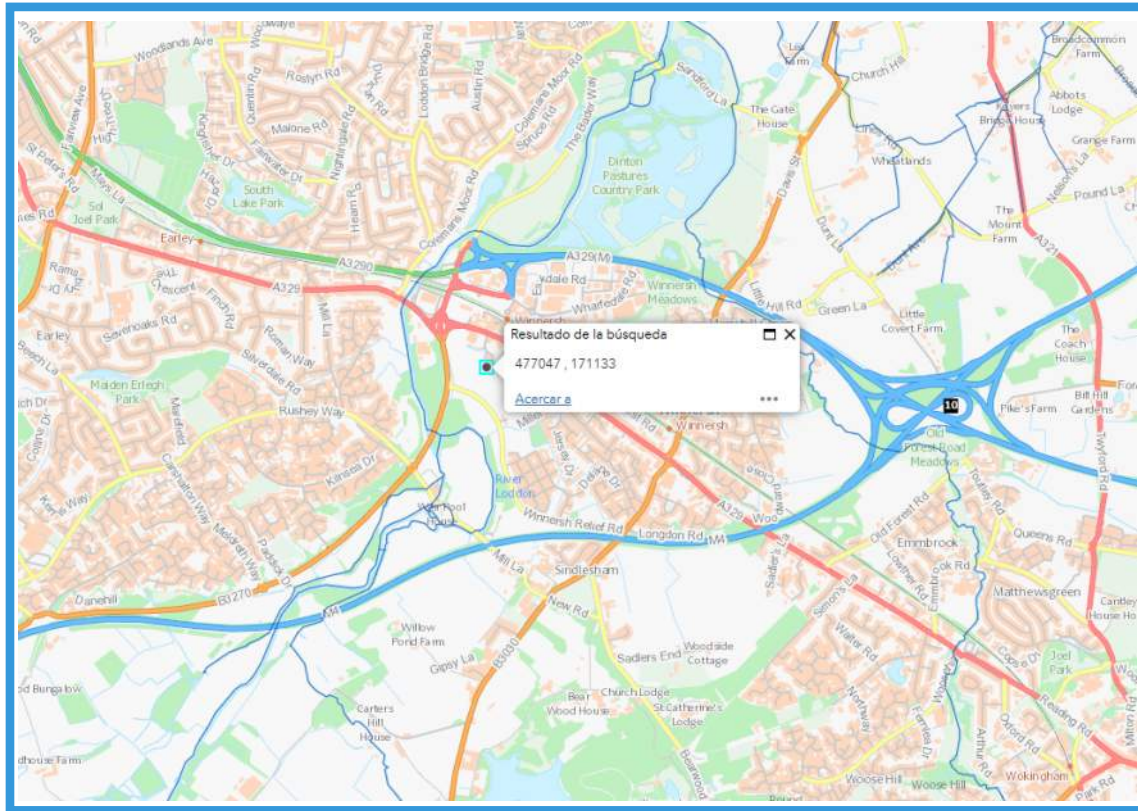


GEOLOGY - BEDROCK - LONDON CLAY FORMATION - CLAY, SILT AND SAND



GEOLOGY - SUPERFICIAL DEPOSITS - RIVER TERRACE DEPOSITS, 2 - SAND AND GRAVEL





- When river levels are normal
- When there is also flooding from rivers

SITE SURFACE WATER FLOOD RISK

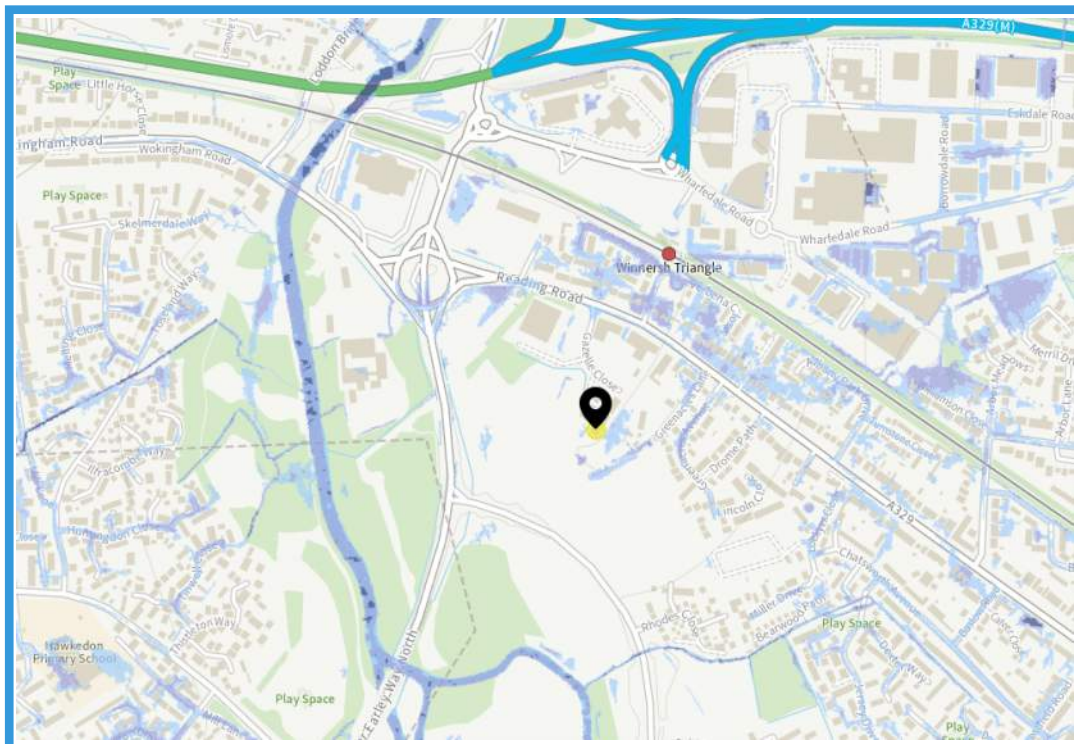
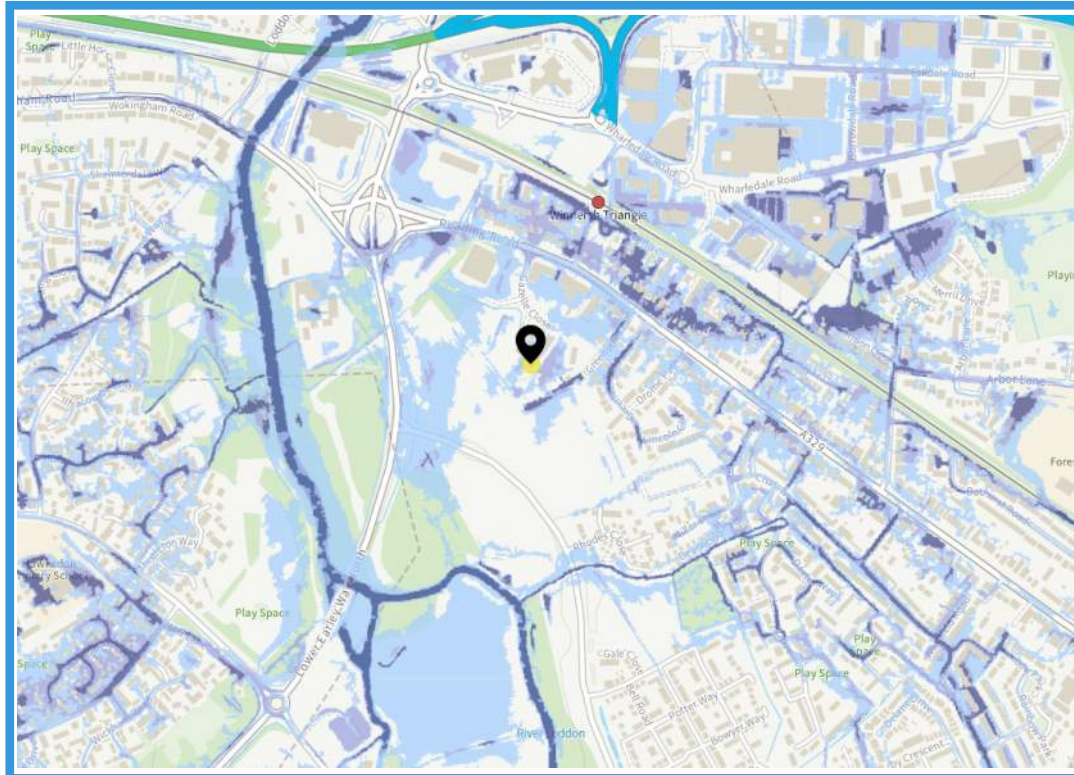


Flood risk from surface water

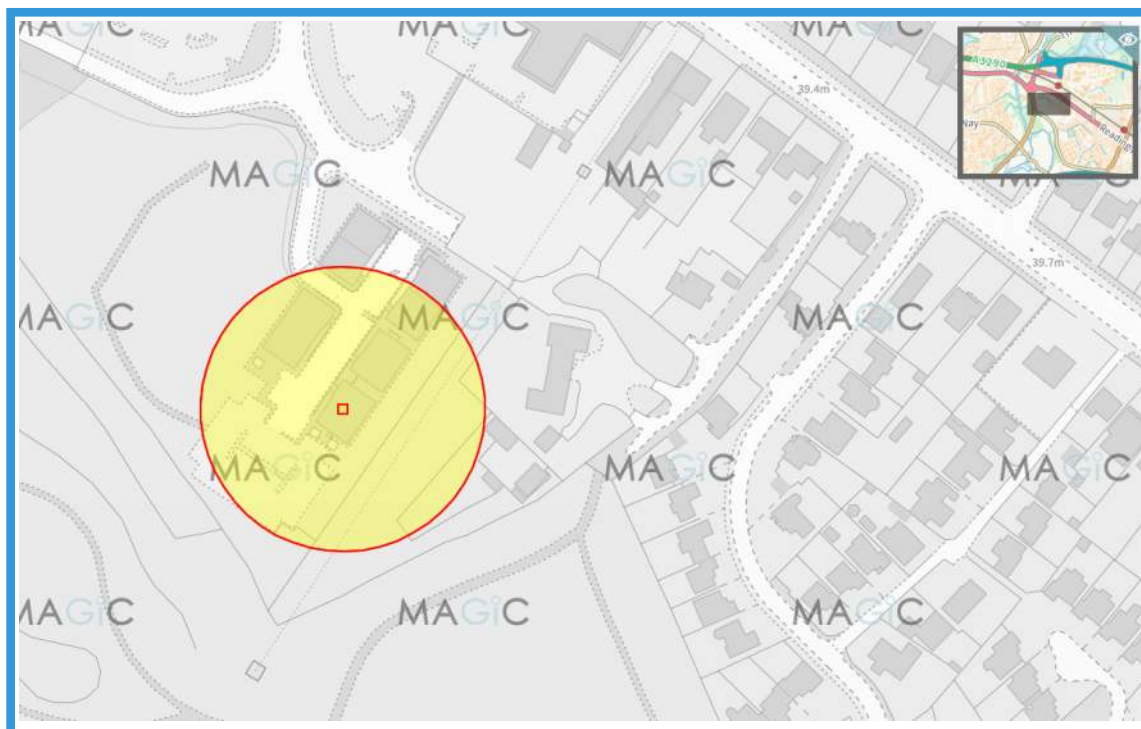


Extent of flooding

High risk means a chance of flooding greater than 3.3% (1:30)
 Medium risk means a chance of flooding of btw 1% (1:100) and 3.3%
 Low risk means a chance of flooding of btw 0.1% (1:1000) and 1%
 Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding



MAGIC RESULTS



Site Check Results

Site Check Report Report generated on Wed Jan 08 2025

You selected the location: Centroid Grid Ref: SU77047113

The following features have been found in your search area:

Aquifer Designation Map (Bedrock) (England)

Typology

Unproductive

Aquifer Designation Map (Superficial Drift) (England)

Typology

Secondary A

Source Protection Zones merged (England)

No Features found

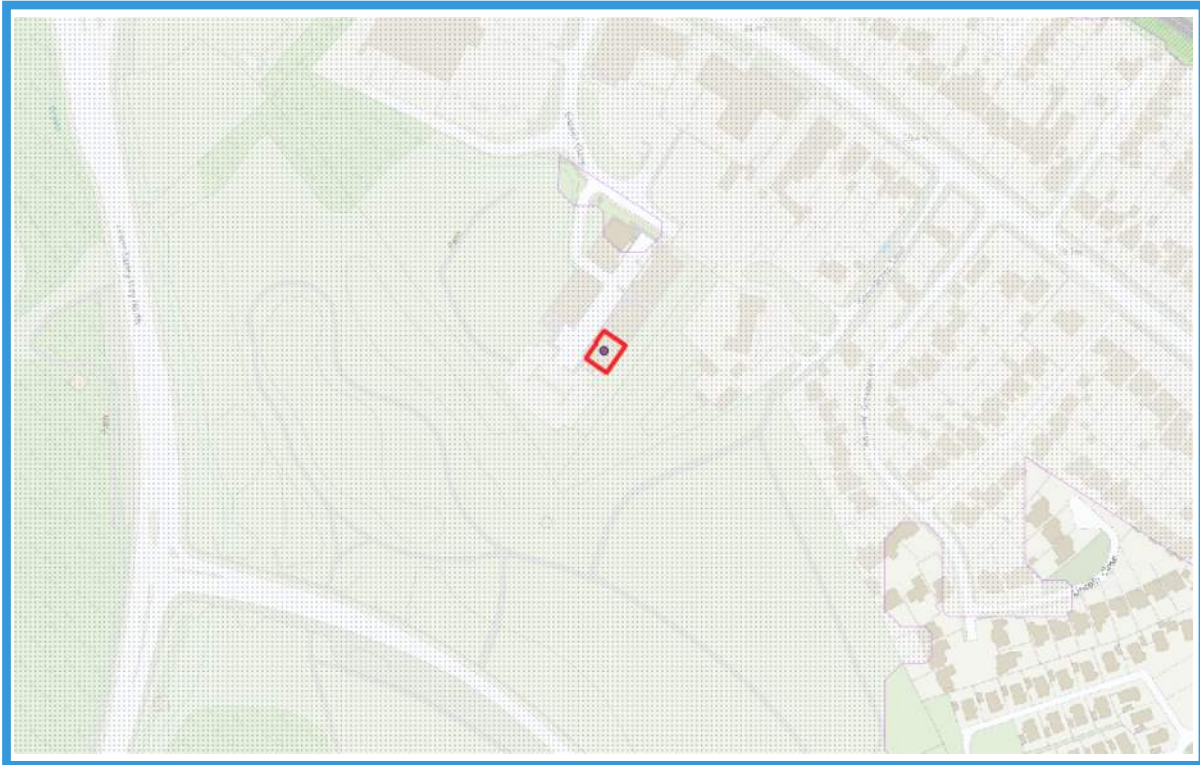
OK

Cancel

Export to CSV

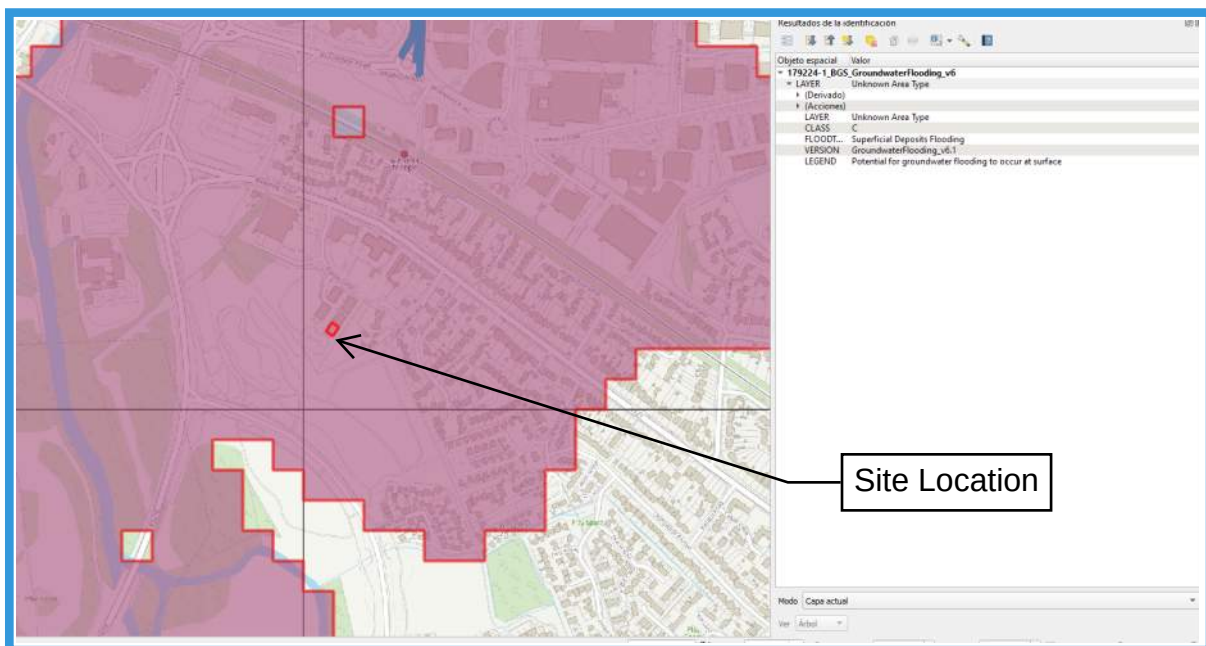
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FLOOD WARNING AREAS

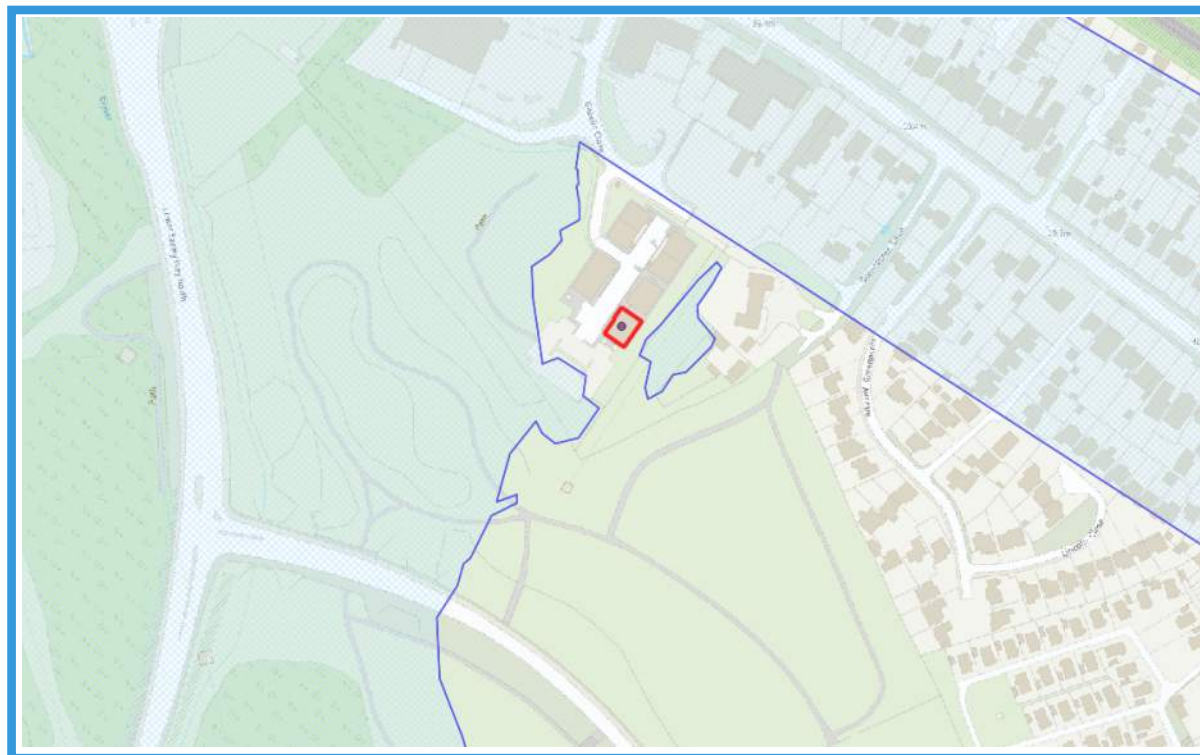


 Flood Warning areas

GROUND WATER FLOOD RISK



HISTORIC FLOOD MAP



 Historic Flood Outline

SEWER FLOODING

Postcode	Number of recorded incidents 2022	Number of recorded incidents 2021	Number of recorded incidents 2020	Number of recorded incidents 2019	Number of recorded incidents from 2000-2019	Total flooding incidents
RG40 5	0	0	0	0	3	3
RG41 1	0	0	0	0	8	8
RG41 2	0	0	1	0	3	4
RG41 3	0	0	0	0	1	1
RG41 4	1	1	2	0	5	9
RG41 5	0	7	7	4	205	223
RG45 6	0	0	0	0	16	16
RG5 3	2	8	6	12	113	141

Flood map for planning

Your reference
<Unspecified>

Location (easting/northing)
477048/171132

Created
8 Jan 2025 13:05

Your selected location is in flood zone 3, an area with a high probability of flooding.

This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see www.gov.uk/guidance/flood-risk-assessment-standing-advice)

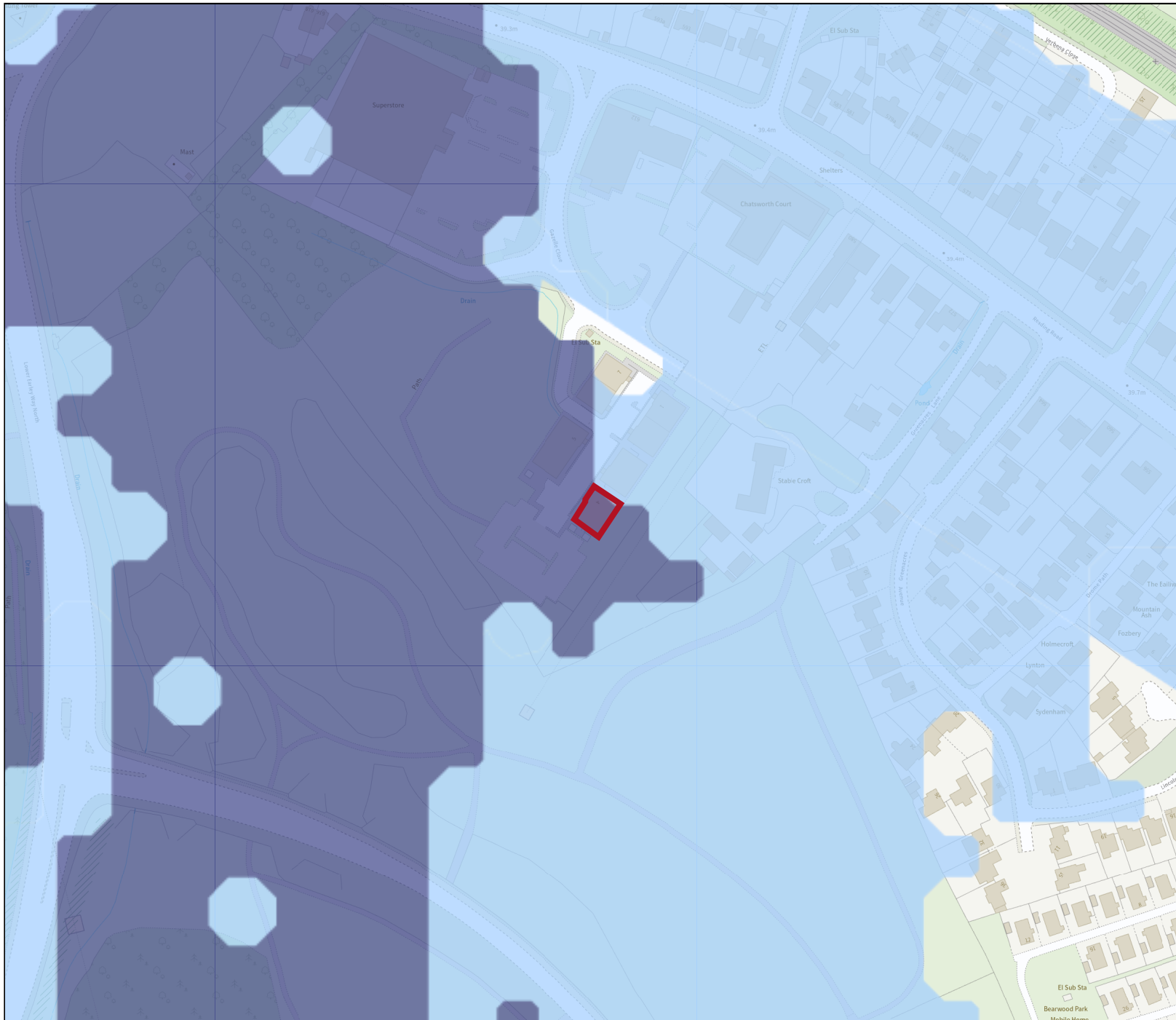
Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Flood risk data is covered by the Open Government Licence which sets out the terms and conditions for using government data. <https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

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Flood map for planning

Your reference
<Unspecified>

Location (easting/northing)
477048/171132

Scale
1:2500

Created
8 Jan 2025 13:05

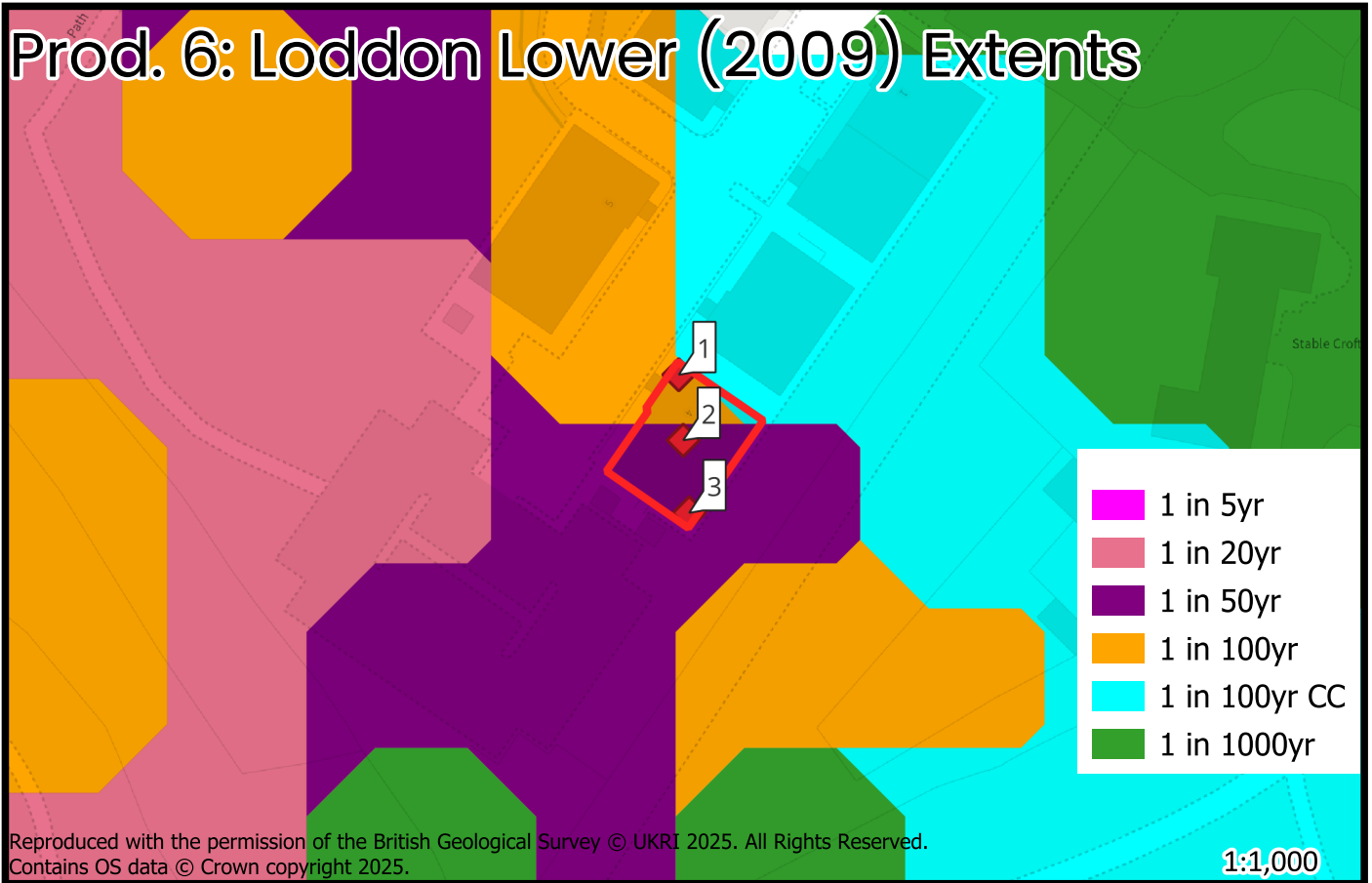
-  Selected area
-  Flood zone 3
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Water storage area

0 20 40 60m



Appendix D

Prod. 6: Loddon Lower (2009) Extents



Prod. 6: Loddon Lower (2009) River Nodes





Prod. 6: Site sampled levels

fid	level_5	level_20	level_50	level_100	level_100c	level_1000
1				39.1267	39.3345	39.9073
2			39.0238	39.1267	39.3361	39.9075
3			39.0238	39.1267	39.3361	39.9075

Prod. 6: Node level information

NODE	LEVEL_5	LEVEL_20	LEVEL_50	LEVEL_100	LEVEL_100C	LEVEL_1000
Lod1.125.1	38.37	38.8	38.93	39.04	39.25	39.85
Lod1.126.1	38.39	38.82	38.95	39.05	39.26	39.85
Lod1.127.1	38.41	38.83	38.96	39.07	39.28	39.86
pathrailea.1	39	39	39	39	39	39.85