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Flood risk, water and environment

Sequential Test
AEG02679_EN4_Barnet_02

Site Address: 65 Crescent Road

Barnet

EN4 9RD

UK Experts in Flood Modelling, Flood Risk Assessments, and Surface Water Drainage Strategies

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Site Location: 65 Crescent Road, Barnet, EN4 9RD.

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1. Introduction

- 1.1. Aegaea were commissioned to undertake a Sequential Test to facilitate a planning application for the proposed development. This Sequential Test has been prepared in accordance with the requirements set out in the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance.

Site Overview

- 1.2. The site of the proposed development is 65 Crescent Road, Barnet, EN4 9RD (Figure 1). The site is bound to the north the Pymmes Brook, residential property boundaries to the east and west and Crescent Road on the south eastern site boundary.

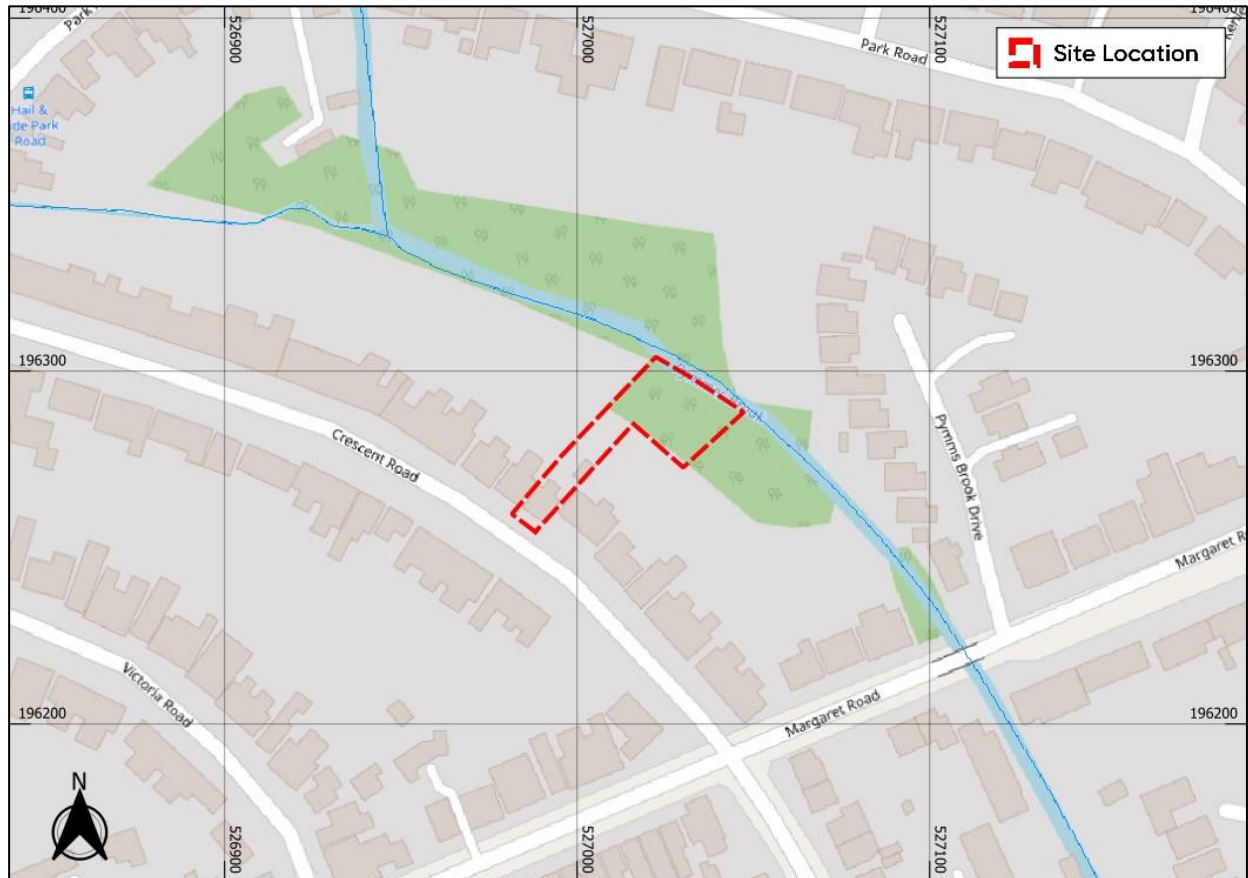


Figure 1: Site Location Site Location (Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). © <https://www.openstreetmap.org> and contributors)

- 1.3. The site is located partially within Flood Zone 1, 2 and 3. Flood Zone 3 denotes a risk of greater than 1 in 100 (1%), Flood Zone 2 denotes a risk of between a 1 in 100 (1%) and 1 in 1,000 (0.1%) and Flood Zone 1 denotes a risk of less than 1 in 1000 (0.1%) (Figure 2).

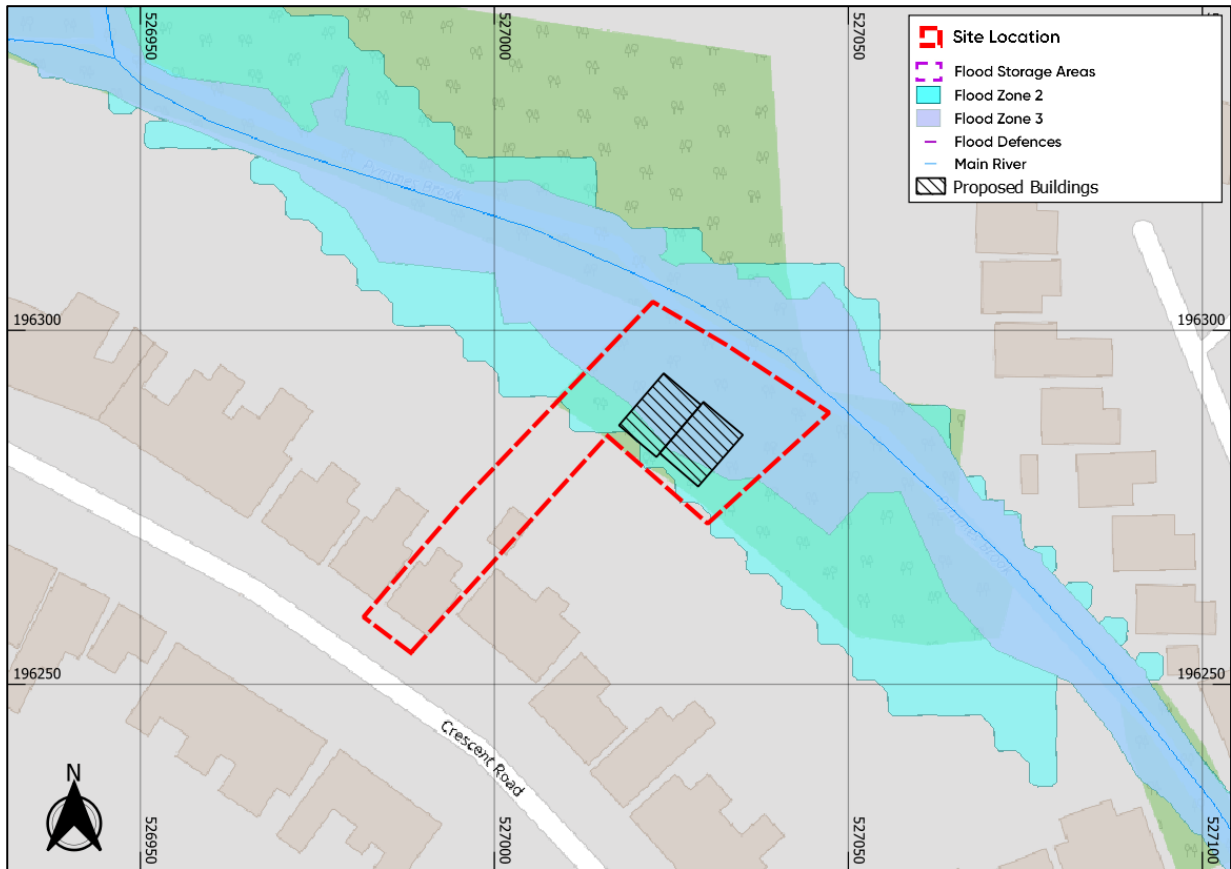


Figure 2: Flood Zone Map (Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). ©<https://www.openstreetmap.org> and contributors. Contains public sector information licensed under the Open Government Licence v3.0)

- 1.4. The existing site is a residential dwelling. The proposed development is for the demolition of the existing residential dwelling and detached garage and the construction of 2 new residential dwellings.
- 1.5. The London Borough of Barnet is the Local Planning Authority (LPA) for the site and is the designated Lead Local Flood Authority (LLFA). The site sits within the Environment Agency's Thames region.

2. National Planning Policy Framework and Local Planning

2.1. The potential consequences of inappropriate development in a flood risk area for occupiers, either of the development or elsewhere, pose significant risks in terms of personal safety and damage to property. The approach taken in the assessment of flood risk at the planning stage is set out in national, regional and local planning policy and associated guidance. The following section summarises the key policies and guidance relevant to the proposed development.

National Planning Policy Framework

2.2. The National Planning Policy Framework¹ (NPPF) (DCLG, 2021) includes Government policy on development and flood risk stating that:

“159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

167. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the

¹ <https://www.gov.uk/guidance/national-planning-policy-framework>, last updated July 2021

event of a flood, it could be quickly brought back into use without significant refurbishment;

- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

2.3. Paragraph: 023 of the NPPG states the following:

The sequential 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. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk.

Local Plan

2.4. The draft London Borough of Barnet Local Plan sets out a requirement for the Sequential Test in its strategic policies;

Policy CS13: Ensuring the efficient use of natural resources

Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. Proposed development must pass the sequential and exceptions test as required by national policy. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction

2.5. The draft London Borough of Barnet Local Plan sets out the requirements for small housing developments;

The Barnet draft Local Plan indicates that, over the plan period up to 2036, the housing delivery target is a minimum of 35,460 new homes (2,364 new homes per

year). The Council also aims to provide a supply of sites for up to 46,000 new homes, over the Local Plan period.

3. Sequential and Exception Tests

3.1. The Sequential and Exception Tests are applied in specific cases defined by UK Government policy. Their purpose is to drive development to areas of low flood risk and to support developments which improve flood risk for developments in areas at risk of flooding.

Sequential Test

3.2. Under the NPPF all new planning applications should undergo a Sequential Test. This test should be implemented by local planning authorities with a view to location particularly vulnerable new developments outside of the flood plain.

3.3. A sequential test will be required support the planning application for the development. To define a search area in order to undertake the sequential test, the Planning Practice Guidance Flood Risk and Coastal Change states:

For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives. Equally, a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location. 027 Reference ID: 7-027-20220825

Relevant decision makers need to consider whether the test is passed, with reference to the information it holds on land availability. The planning authority will need to determine an appropriate area of search, based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other 'reasonably available' sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market. The applicant may also need to check on the current

status of relevant sites to determine if they can be considered 'reasonably available'. - Paragraph: 029 Reference ID: 7-029-20220825.

- 3.4. The search area for this Sequential Test is the whole of the London Borough of Barnet.
- 3.5. If a development passes the Sequential Test, it is then required to pass the Exception Test. To do this, a development must be able to show that the proposed development;
 - a) Provides wider sustainability benefits to the community that outweighs the flood risk and;
 - b) Will be safe for the duration of its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

Identifying Alternative Sites

- 3.6. The Sequential Test requires the identification of any alternative sites within the search area that are at lower risk of flooding and would be more appropriate.
- 3.7. The relevant documents in the Brownfield site register have been considered. The brownfield site register is a list of previously developed (brownfield) land in Brent, produced in accordance with the Town and Country Planning (Brownfield Land Register) Regulations 2017. The 2022 Brownfield Register includes land that has come forward from a range of sources, including sites that have already been granted planning permission and sites that have been put forward by landowners and developers.
- 3.8. All sites provided in Appendix D and E (Sites Approvals and Allocations, respectively) of the London Strategic Housing Land Availability Assessment (SHLAA, 2017) for the Barnet Borough Area.
- 3.9. The relevant documents in the draft Barnet Local Plan have also been considered. It is noted that this document is in its draft form, so the sites identified as available and suitable in the final Local Plan may differ upon release.

Determining If Alternative Sites Are 'Reasonably Available'

- 3.10. A development proposal will only fail to pass the Sequential Test if alternative sites are identified within the search area that are at lower risk of flooding, would be appropriate for the proposed development and are 'reasonably available' for development. A site is only considered to be reasonably available if it is both 'deliverable' and 'developable' as defined by the NPPF.

- 3.11. Additionally, a site is only considered to be reasonably available if all the following apply:
- The site is within the agreed area of search (London Borough of Barnet);
 - The site is of comparable size and can accommodate the requirements of the proposed development, and;
 - The site is either:
 - Owned by the applicant.
 - For sale at a fair market value; or
 - Is publicly owned land that has been formally declared to be surplus and is available for purchase.
 - The site is not safeguarded in the Local Plan for another use.
- 3.12. Sites are not considered to be reasonably available if they fail to meet any of the above requirements or already have planning permission for a development that is likely to be implemented.

Criteria to Determine Suitability of Alternative Sites

- 3.13. There is no prescribed format for the completion of a sequential test. Therefore, Aegaea have drawn reference to other councils' guidance documents for applications and planning officers in order to write a robust test.
- 3.14. When defining parameters to search, a map should be included or a clear description of the area of search, together with reasons for choosing that area. There should also be a clear explanation and justification for any limiting parameters applied to the site search, such as size/capacity, particularly locational requirements etc.
- 3.15. To assess the suitability of alternative sites Aegaea have defined the following criteria which is to be applied, based on criteria guidance issued from various local authorities. It includes a series of six questions to which all sites have been assessed against. The justification for each question is listed below.

Q1. Is the alternative site located within the search area of the London Borough of Barnet?

- 3.16. The whole of the London Borough of Barnet area has been used as a study area.

Q2. Is the alternative site located in Flood Zone 1?

3.17. The Sequential Test aims to relocate development to areas of lower flood risk. The development is located partially within Flood Zone 2 (with all developed located in Flood Zone 1). Therefore, sites within Flood Zone 2 and 3 were discounted as having a worse or equal flood risk to that of the proposed development. This includes sites that are partially located within Flood Zone 2 or 3 given that the overarching goal of the Sequential Test is to redirect developments to areas at lower risk of flooding.

Q3. Is the alternative site of comparable size to the proposed development (0.09 ha)? Is it +/- 60% of the proposed site size (therefore between 0.035 ha and 0.15 ha)?

3.18. Any sites should be similar in size and scale to that of the development site. This is an important factor as a larger site may be better suited to multiple dwellings and therefore fetch a higher market rate, compromising the financial viability of a smaller-scale developer.

Q4. Can the alternative site provide, as a minimum, a similar number of dwellings and up to net dwelling capacity (i.e 1 to 5 units)?

3.19. Any alternative sites should be similar in capacity/yield as the proposed development. Housing capacity is a significant factor that not only determines how much land will be required to deliver overall district housing requirements but, at a site-specific level, it can heavily influence economic viability and the likelihood of a site being deliverable. Consequently, quantifying the supply involves the generation of indicative capacities for each of the identified sites.

Q5. Is the alternative site reasonably available?

3.20. 'Reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development. If there is a live planning application or approved planning application, then the site would not be considered available for purchase.

Q6. Is the alternative site at risk of other sources of flooding? Do the other sources compromise future development in terms of units that can be delivered?

3.21. The overarching goal of the Sequential Test is to redirect developments to areas at lower risk of flooding. Therefore, if a site is found to have a higher flood risk from any other source that could compromise future development, it is not considered to be a suitable alternative.

3.22. Where an alternative site is unable to meet the criteria, this will be deemed as a failure and the site will be discounted. As such alternative sites will be required to pass all 6 questions to be considered a suitable alternative site. Once all 6 questions have been passed, the site will be assessed in more detail.

Review of Alternative Sites

3.23. The 147 assessed sites within the Barnet Borough area are detailed in the table below;

3.24. Publicly available maps, provided by Barnet² were used in the assessment of each site to visualise location, determine flood zone, flood risk and size.

3.25. The sites listed in Table 4 are reviewed using the criteria for this Sequential Test.

² <https://open.barnet.gov.uk/dataset/249xe/brownfield-land-register>

Table 1: Site Suitability Determination

Site Ref	Location	Planning Ref	Size (ha)	Date of planning permission	suggested yield	Q1 - Is the alternative site located within the search area?	Q2 - Is the alternative site located in Flood Zone 1?	Q3 - Is the alternative site of comparable size to the proposed development? Is it +/- 25% of the proposed site size, ha?	Q4 - Can the alternative site provide the same number of units?	Q5 - Is the alternative site reasonably available?	Q6 - Is the alternative site at risk of other sources of flooding? Do the other sources compromise future development in terms of units that can be delivered?
Brownfield Register											
18/5666/FUL	Sir Thomas Lipton Memorial Hospital, Osidge, 151 Chase Side, Southgate, London, N14 5HE	permitted	2.002	05/02/2021	30	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
16/3377/FUL	Garages Off Linden Road And Pine Road, London, N11 1ER	permitted	0.08	24/06/2019	6	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
15/07932/OUT	North London Business Park	permitted	16.49	15/04/2021	1000	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/04442/FUL	Imperial House, The Hyde, London, NW9 5AL	permitted	0.348		81	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
19/1049/FUL	100 Burnt Oak Broadway, Edgware, HA8 0BE	permitted	0.28	18/06/2021	100	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
19/2657/FUL	Colesworth House, Crokesley House, Curtlington House, Clare House and Kedyngton House, Burnt Oak Broadway, HA8	permitted	0.78	29/01/2021	18	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
F/04474/14	Granville Road Estate, Granville Road, Childs Hill London, NW2	permitted	2.323		132	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/05969/FUL	Church Walk House, Church Walk, London, NW2 2TJ	permitted	0.42	13/09/2021	35	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/2690/PNO	220 The Vale, London, NW11 8SR	permitted	0.035		14	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
17/0233/FUL	194 - 196 Cricklewood Broadway, London	permitted	0.612	01/06/2018	97	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
18/4674/FUL	Hermitage Lane	permitted	0.25	21/01/2022	52	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
14/07064/FUL	Buildings D3 To D8, Beaufort Park, Aerodrome Road, Colindale, NW9	permitted	0.81		237	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
H/05828/14	Homebase, Rookery Way, London, NW9 6SS	permitted	1.44		387	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
W01731JS/04	Grahame Park Estate - Bounded By Lanacre Avenue To The West, Grahame Park Way To The South And Field Mead To The North London NW9	permitted	34		2977	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3

W00198AA/04	Former Raf East Camp Site, Aerodrome Road, Grahame Park Way, London NW9	permitted	10		2800	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
H/04753/14	Peel Centre, Peel Drive, Colindale, London, NW9 5JE	permitted	15.961	30/04/2021	2900	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
H/05833/14	126 Colindale Avenue, London, NW9 5HD	permitted	0.204		35	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
16/6222/FUL	Land Behind Sheaveshill Court, The Hyde, London, NW9 6SJ	permitted	1.632	05/02/2018	34	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
18/0352/FUL	Colindale Telephone Exchange, The Hyde, London, NW9 6LB	permitted	1.007	05/02/2021	220	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
19/0859/OUT	Colindale Station Colindale Avenue NW9 5HR	permitted	0.76	25/05/2018	303	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
19/6786/FUL	45-47 Friern Barnet Road, N11 3EG	permitted	0.115	26/07/2019	22	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
B/04834/14	Land Formerly Known As British Gas Works Albert Road, Albert Road, Barnet, Herts	permitted	2.2	07/08/2019	305	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
B/02366/13	11-13 Approach Road, Barnet, Herts, EN4 8FG	permitted	0.068	08/04/2021	15	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
16/3262/FUL	Land Adjacent To 106 -128 Mount Pleasant And 27-37 Langford Road, Barnet, EN4 9HG	permitted	0.424	12/04/2019	12	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/5522/FUL	Salvation Army Hall, Albert Road, EN4 9SH	permitted	0.29	27/06/2019	39	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/1409/FUL	Land Adj To 1 - 12 Norfolk Close, London, N2 8ET	permitted	0.039	23/07/2019	8	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
H/05563/14	2 Ashcombe Gardens, Edgware, Middx, HA8 8HS	permitted	0.079	29/08/2019	6	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
15/01294/PNO	42-46 Station Road, Edgware, Middlesex, HA8 7ZZ	permitted	0.025	16/10/2019	8	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/03137/FUL	Land At Broadfields Primary School, Roseberry Drive, Edgware, HA8 8JP	permitted	2.05	12/08/2019	112	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
16/0112/FUL	102-124 Station Road And Car Park To Rear, Edgware, Middlesex, HA8 7BJ	permitted	0.6	07/08/2019	123	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/1065/FUL	80 The Grove, Edgware, HA8 9QB	permitted	0.196	02/09/2019	6	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
18/2839/FUL	Land At The Rectory, Rectory Lane, Edgware, HA8 7LG	permitted	0.339		52	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
18/4685/FUL	186 High Street, HA8 7EX	permitted	0.12	18/11/2019	20	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
18/2839/FUL	Land at the Rectory, Rectory Lane, HA8 7LG	permitted	0.33	16/01/2020	51	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
16/3417/PNO	Dove House, Gadd House And Cooper House, Arcadia Avenue, London, N3 2JU	permitted	0.21	23/01/2020	88	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/0047/PNO	298 - 304 Regents Park Road, London, N3 2SZ	permitted	0.531	11/02/2020	130	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3

F/05720/14	Dryades, The Bishops Avenue, London, N2 0BA	permitted	0.49	30/03/2020	9	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
F/04857/14	The Towers, The Bishops Avenue And 1-5 Arden Court Gardens, London, N2 0BJ	permitted	1.67	04/06/2020	44	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
F/01413/13	R/O 698 Finchley Road, London, NW11 7NE	permitted	0.036	29/06/2020	9	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
15/00720/RMA	Land Off Brent Terrace, London, NW2, (The Brent Terrace Triangles)	permitted	0.77	01/07/2020	47	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
16/3806/FUL	290-294 Golders Green Road, London, NW11 9PY	permitted	0.42	03/07/2020	60	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
17/6662/RMA	Brent Cross Cricklewood Regeneration Area, North West London	permitted	0.77	10/07/2020	292	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
15/03138/FUL	Land Adjacent Northway And Fairway Primary School, The Fairway, Mill Hill, London, NW7 3HS	permitted	1.8	17/08/2020	120	Yes	Flood Zone 2	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
16/7594/FUL	The Vicarage, Deans Lane, Edgware, HA8 9NT	permitted	0.275	25/08/2020	9	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
H/03301/14	73-77 Brent Street, London, NW4 2EA	permitted	0.032	29/10/2020	9	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/2709/FUL	Craymere Cottage And Fordfield Cottage, 9-11 Parson Street, London, NW4 1QE	permitted	0.02	10/02/2020	6	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
18/7495/FUL	Westhorpe Gardens and Mills Grove NW4 2TU	permitted	2	01/04/2020	149	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
18/4700/FUL	Brake Shear House, 164 High Street, Barnet, EN5 5XP	permitted	0.398	07/05/2020	40	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/06410/FUL	Land At 1-7 Moxon Street And At 44 Tapster Street Including Land To The Rear Of 1-11 Moxon Street And Opposite The Old Printworks, Barnet, EN5 5TY	permitted	0.17	07/08/2020	12	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/03115/PNO	Ocean House, R/O 2-24 Lytton Road, Barnet, EN5 5BY	permitted	0.15		29	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
18/1337/FUL	Moxon Street Garage, EN5 5TY	permitted	0.06	22/02/2022	10	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
H/04017/09	Inglis Barracks, Mill Hill, London, NW7 1PX	permitted	24.23	23/12/2016	2174	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/06417/OUT	Milbrook Park, Mill Hill, London, NW7 1SJ	permitted	0.42		66	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/3796/FUL	141-143 Dollis Road, London, NW7 1JX	permitted	0.278		26	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
B/06116/13	1060A-1072 High Road, London, N20 0QP	permitted	0.578		56	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/3106/FUL	Development Site East Of 23 Formerly Known As 25, Oakleigh Road North,	permitted	0.056		9	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4

	London, N20 9HE										
18/5067/PNO	Kingmaker House, Station Road, Barnet, EN5 1NZ	permitted	0.26		94	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
14/07670/FUL	1201 High Road, London, N20 0PD	permitted	0.95		124	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/1313/PNO	Barnet House, 1255 High Road, London, N20 0EJ	permitted	0.624		254	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/5615/FUL	Friern Court, Friern Barnet Lane, London, N20 0NJ	permitted	0.422		11	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
18/6390/FUL	Myddleton Tennis Club, 1060 High Road, London, N20 0QP	permitted	0.283		8	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
19/1950/FUL	70-84 and Land R/O Oakleigh Road North, N20 9EZ	permitted	0.8		107	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
19/6833/FUL	66 Woodside Park Road, N12 8RY	permitted	0.06		13	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
15/03139/FUL	Land Adjacent To Whittings Hill Primary School, Whittings Road, Barnet, EN5 2QY	permitted	0.66		33	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
B/00354/13	Dollis Valley Estate, Including Former Barnet Hill School, Barnet South Community Association Hall And 131-135 Mays Lane, Barnet, EN5	permitted	10.36		631	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
18/5926/FUL	Marie Foster, Wood Street, EN5 4BS	permitted	1		100	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/02178/PNO	354 Ballards Lane, London, N12 0EH	permitted	0.018		8	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
15/02177/PNO	Apex House, Grand Arcade, London, N12 0EH	permitted	0.03		8	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/5180/FUL	105A Ballards Lane, London, N3 1XY	permitted	0.107		10	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
19/2079/FUL	Former Police Station 193-195 Ballards Lane N3 1LZ	permitted	0.19	30/12/2020	41	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
16/3265/PNO	110 - 124 West Hendon Broadway, London, NW9 7AA	permitted	0.28		22	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
H/01054/13	West Hendon Estate, West Hendon, London, NW9	permitted	12.99		2000	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/2355/PNO	1,3,4 And 5 The Exchange, Brent Cross Gardens, London, NW4 3RJ	permitted	0.309		89	Yes	Flood Zone 3	Failed at Q2	Failed at Q2	Failed at Q2	Failed at Q2
17/2963/RMA	Brent Cross Cricklewood Regeneration Area, London, NW4	permitted	0.69		52	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/2581/PNO	242 - 246 Ballards Lane, London, N12 0EP	permitted	0.074		5	Yes	Flood Zone 1	Yes	Yes	No - Site was approved planning for the conversion of the building to 5 residential flats in 2017 under planning ref 17/2581/PNO.	Failed at Q5

										Site has been built out and completed	
17/0594/FUL	744 High Road, London, N12 9QG	permissioned	0.028		8	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17/6150/PNO	Broomhills, Woodside Lane, London, N12 8RB	permissioned	0.051		9	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
17/0786/PNO	869 High Road, London, N12 8QA	permissioned	0.037		10	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
17/6593/FUL	Britannia House, 960 High Road, N12 9RY	permissioned	0.1		23	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
SHLAA											
17030068	Gateway House	Approval	0.26		77	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030061	Albert Road	Allocation	0.26			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030050	886-902 High Road	Approval	0.27		52	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030004	110-124 West Hendon Broadway, NW9 7AA	Approval	0.28		22	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030343	126 Colindale Avenue	Approval	0.28		35	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030369	Plot 2, Development Site between 63 and 81 Winnington Road, N2 0TS	Approval	0.3		1	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030411	The Croft, 198 Barnet Road, EN5 3LF	Approval	0.31		1	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030006	117-125 West Hendon Broadway	Approval	0.33		47	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030286	Land to the rear of Hornbeams The Bishops Avenue, N2 0BJ	Approval	0.36		2	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030340	Imperial House	Approval	0.37		76	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030019	290-294 Golders Green Road, NW11 9PY	Approval	0.41		60	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030073	319 Ballards Lane	Approval	0.44		16	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030244	High Street	Approval	0.45		12	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030413	Hyde House	Approval	0.47		40	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030347	McDonalds island site Colindale	Allocation	0.53			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030075	Sainsbury's New Barnet	Allocation	0.54			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030465	Brookdene Holden Road	Approval	0.55		29	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030174	104 Lancaster Road	Approval	0.58		6	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030176	East Barnet Road garage site	Allocation	0.59			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030002	1060A -1072 High Road, N20 0QP	Approval	0.6		55	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030005	112 TO 114 CRICKLEWOOD LANE	Approval	0.62		122	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030464	Premier Place, 102-124 Station Road And Car Park to Rear	Approval	0.63		122	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030331	Northway House,1379 High Road	Approval	0.72		149	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030178	Groupama House/Kingmaker House	Approval	0.79		131	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030282	Land Off Brent Terrace The Brent Terrace Triangles	Approval	0.86		-13	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030120	Chandos Lawn Tennis Club Chandos Way	Approval	0.96		45	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3

17030088	Block G, Beaufort Park Aerodrome Road	Approval	0.98		159	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030288	Leo Baeck House, 65-67 The Bishops Avenue	Approval	0.99		20	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030341	Merit House	Allocation	0.99			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030301	Marie Foster Home, Wood Street	Allocation	1			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030188	Finchley central station car park	Allocation	1.01			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030007	1201 High Road, N20 OPD	Approval	1.06		124	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030016	TESCO 21 TO 29 BALLARDS LANE, N3 1XP	Allocation	1.09			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030463	41 Wilmot Close	Approval	1.11		16	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030167	EDGWARE FORUMSIDE	Allocation	1.37			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030194	Former Parcel Force Building, Geron Way	Approval	1.41		230	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030089	Blocks C5 To C12 Aerodrome Road	Approval	1.52		360	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030248	Homebase Rookery Way	Approval	1.52		386	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030171	Elmbank Barnet Road	Approval	1.63		114	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030069	Arden Court, 53 The Bishops Avenue	Approval	1.65		38	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030273	Land At Broadfields Primary School Roseberry Drive	Approval	1.74		112	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030267	Land Adjacent Northway And Fairway Primary School The Fairway	Approval	1.76		120	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030345	Middlesex University existing Accommodation	Allocation	1.87			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030062	Albert Road	Allocation	2.21			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030119	Land off Chandos Avenue and Brethern Meeting Hall	Approval	2.26		35	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030095	British Library Newspapers, 130 Colindale Avenue	Approval	2.37		258	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030278	Land Formerly Known As British Gas Works Albert Road	Approval	2.65		305	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030272	Land Adjacent To Whittings Hill Primary Whittings Road	Approval	2.99		33	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030398	St Joseph's College Lawrence Street	Approval	3.01		49	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030210	GRANVILLE ROAD	Approval	3.73		111	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030076	Barnet And Southgate College Grahame Park Way	Approval	5.46		396	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030277	Land Between Sweets Way Oakleigh Road North	Approval	6.21		146	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030097	Brook Valley Gardens (Frm Dollis Valley Estate),131-135 Mays Lane	Approval	11.08		83	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030366	Stonegrove and Spur Road Estate Green Lane	Approval	11.36		122	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030437	West Hendon Estate Ramsey Close	Approval	12.93		960	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030330	North London Business Park	Allocation	16.43			Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3

17030360	Peel Centre Peel Drive	Approval	19.6		2877	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030207	Grahame Park Estate Lanacre Avenue	Approval	28.37		978	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030466	Millbrook Park (Former Ingilis Barracks)	Approval	38.41		1716	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
17030092	Brent Cross Cricklewood Regeneration Area Edgware Road	Approval	137.0 2		7333	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
Barnet Draft Local Plan											
1	Former Church Farm Leisure Centre, Burlington Rise, Brunswick Park, EN4 8XE		0.13		12	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
18	Former East Barnet Library, 85 Brookhill Road, New Barnet, EN4 8SG		0.16		12	Yes	Flood Zone 1	No	Failed at Q3	Failed at Q3	Failed at Q3
32	Manor Park Road car park 72-76, Manor Park Rd, East Finchley, N2 0SJ		0.07		7	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
34	Burrough Gardens Car park (Middlesex University and the Burroughs), The Burroughs, Hendon, NW4 4AU		0.06		9	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
35	Egerton Gardens car park (Middlesex University and the Burroughs), The Burroughs, Hendon, NW4 4BD		0.09		23	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
39	The Burroughs car park (Middlesex University and the Burroughs), The Burroughs, Hendon, NW4 4AR		0.13		21	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4
59	Central House (Finchley Central Town Centre), 1 Ballards Lane, Finchley, N3 1UX		0.15		48	Yes	Flood Zone 1	Yes	No	Failed at Q4	Failed at Q4

Summary of Sequential Analysis

3.26. A summary of the assessed sites is below:

- 147 sites from the Barnet Borough Council SHLAA, brownfield land register and draft local plan.

3.27. Analysis within Table 3 to determine whether there were any that met the criteria for being a 'suitable alternative' found that there were no alternative sites that are similar in size and scale to the proposed site that would be suitable/available for the development.

3.28. Therefore, the site is deemed to pass the Sequential Test.

4. Exception Test

- 4.1. The Exception Test, as set out in paragraph 160 of the Framework, is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.
- 4.2. As per Section 2 of this report, to pass the Exception Test must be able to show that the development;
 - a) Provides wider sustainability benefits to the community that outweighs the flood risk and;
 - b) That the development will be safe for the duration of its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.
- 4.3. For part one of the Exception Test, the proposed development will implement a Sustainable Drainage System (SuDS) to contribute to sustainability. The planning consultant should advise on benefits to the wider community.
- 4.4. For the second part, the accompanying FRA (reference: AEG02679_EN4_Barnet_01) demonstrates that flood risk can be managed via a series of mitigation measures.

5. Conclusions

- 5.1. This Sequential Test has been undertaken with reference to the requirements of NPPF and Planning Practice Guidance with respect to the development at 65 Crescent Road, Barnet, EN4 9RD. It has been written to support a planning application and has been prepared with due consideration to the nature of the proposed development to provide the appropriate level of detail.
- 5.2. The following conclusions can be drawn from this Sequential Test:
 - Analysis of available land within the Barnet Borough region has deemed that there is **no reasonably available land** suitable for the proposed development and as such it should be deemed that the preferred location for the development is within the site.
- 5.3. 147 sites from the Barnet Borough Council SHLAA, brownfield land register and draft local plan were assessed against the 6 defined conditions. It was found that there are no available sites that are developable and deliverable whilst being viable alternatives to the application site.
- 5.4. Therefore, the sequential test is passed, and the proposed development is suitable and required in the proposed location. This sequential test should be submitted as part of the planning application to satisfy the requirements under the NPPF.