



Cricklewood PropCo Limited

400 Edgware Road

## FLOOD RISK STATEMENT

REPORT REF.  
2303910-R09

March 2024

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### Document Control Sheet

REV	ISSUE PURPOSE	AUTHOR	CHECKED	APPROVED	DATE
-	DRAFT	MG	GA	DRAFT	01/02/2024
-	FINAL	MG	GA	CC	13/03/2024

### Distribution

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## 1. Introduction

- 1.1. Ardent Consulting Engineers (hereafter referred to as "Ardent") has been commissioned by Cricklewood PropCo Limited to undertake a Flood Risk Statement (FRS) for the proposed redevelopment of 400 Edgware Road, Cricklewood.
- 1.2. This FRS has been prepared with specific reference to the requirements of National Planning Policy Framework (NPPF) updated in July 2021 and the Planning Practice Guidance (PPG), which superseded the Technical Guidance to the NPPF in 2014 and was updated in August 2022.

### Site Location

- 1.3. The site is located in a mixed-use area, inclusive of residential, commercial, leisure and retail land uses. The site is bound by Cricklewood Rail Freight Facility to the north and east, Roman Road to the southeast, and A5 Edgware Road to the southwest as shown on Figure 1-1 below and in Appendix A.



Figure 1-1: Site Location Plan

### Development Proposals

- 1.4. The Site is not located within a Conservation Area, does not comprise a Listed Building and there are no heritage assets within proximity. It is considered that the adaptation of the building for future use is more appropriate than wholesale demolition of the building.
- 1.5. The development description is provided below:  
  
'Erection of rear extension to provide additional self-storage floorspace (Use Class B8) with associated car and cycle parking, landscaping and other works ancillary to the development.'
- 1.6. The existing and proposed development plans are included in Appendix B.

## 2. Policy Context

### National Planning Policy Framework

- 2.1. The National Planning Policy Framework (NPPF) was updated in December 2023; paragraph 165 to 175 inclusive, establishes the Planning Policy relating to flood risk management. The Technical Guide to the NPPF has been superseded by the Planning Practice Guidance (PPG) in March 2014 and was last updated in August 2022.
- 2.2. The main focus of the policy is to direct development towards areas of the lowest practicable flood risk and to ensure that all development is safe, without increasing flood risk elsewhere. The main considerations are:

applying the sequential test and then, if necessary, the exception test as set out below;

safeguarding land from development that is required, or likely to be required, for current or future flood management;

using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and

where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

### Flood Risk and Coastal Change Planning Practice Guidance, March 2014

- 2.3. The 'Flood Risk and Coastal Change' section of the Planning Practice Guidance (PPG) was initially published in March 2014 with new updated paragraphs from 2015 and 2016. PPG operates in conjunction with the NPPF. As it is an extensive online resource of detailed policy guidance intended to serve as a living document, it is subject to periodic updates.
- 2.4. The 'Flood risk and Coastal Change' section of the PPG advises users on how to take account of and address the risks associated with flooding and coastal change in the planning process. The section, made up of 86 paragraphs, defines flood risk and how to address all sources of risk. It provides information on how flood risk should be taken into account in the preparation of local plans and what SFRAs should include. Where relevant, specific PPG paragraphs are referenced throughout

this SFRA in the relevant sections. The current version of the PPG includes new and.

#### Flood and Water Management Act (2010)

- 2.5. The Flood and Water Management Act places a duty on all flood risk management authorities to co-operate with each other. The act also provides Lead Local Flood Authorities (LLFA) and the Environment Agency (EA) with a power to request information required in connection with their flood risk management functions.
- 2.6. The LLFAs are responsible for developing, maintaining, and applying a strategy for local flood risk management in their areas, and for maintaining a register of flood risk assets. They also have lead responsibility for managing the risk of flooding from surface water, groundwater, and ordinary watercourses.

#### The London Plan 2021, March 2021

- 2.7. The London Plan, first published in 2004 and last updated in March 2021, is the Greater London Authority's (GLA) spatial development strategy plan for London. It sets the framework for development in London over the next 20-25 years, linking key economic, environmental, transport and social priorities.
- 2.8. London Plan has various objectives that aim to make the city a world leader in improving the environment. One of the objectives is to address climate change, which is elaborated in Chapter 9 of the plan. The chapter includes several policies that tackle flood risk and water resource matters, such as Policy SI12 that deals with flood risk management and Policy SI13 that covers Sustainable Drainage.

#### Thames River Basin Management Plan, Part 1 (2015)

- 2.9. The purpose of a river basin management plan is to provide a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning.
- 2.10. This plan contains 4 sets of information that groups who manage land and water should pay particular attention to:

Baseline classification of water bodies - One of the main purposes of this plan is to prevent water bodies from deteriorating. Deterioration from the baseline is not permitted, except in very specific circumstances that are described in the plan.



Statutory objectives for protected areas – This plan highlights the areas of land and bodies of water that have specific uses that need special protection. These include waters used for drinking water, bathing, commercial shellfish harvesting and those that sustain the most precious wildlife species and habitats. The plan ensures that these areas have the legally binding objectives in place that protect those uses from potentially harmful activities and new developments.

Statutory objectives for water bodies - This plan sets out legally binding objectives for each quality element in every water body, including an objective for the water body as a whole.

Summary programme of measures to achieve statutory objectives - This plan provides a framework for action and future regulation. To do this it summarises the existing mechanisms, both statutory and voluntary, that are used to manage the quality of the water environment. It also summarises the types of action and who needs to do this, to achieve the statutory objectives.

### The Local Plan

- 2.11. Barnet's Local Plan features a suite of Development Plan Documents and Supplementary Planning Documents. Central to this is the 'Core Strategy', published in September 2012. The document includes the 'vision' for the Local Plan and fundamental objectives and policies. Information in sections '18.12 – Flooding and Water Management' and '18.13 – Water Quality and Supply' relates to flood risk.
- 2.12. These sections feed into 'Policy CS13: Ensuring the efficient use of natural resources. The policy will seek to minimise Barnet's contribution to climate change and ensure that through the efficient use of natural resources the borough develops in a way which respects environmental limits and improves quality of life. The aim is to make Barnet a water efficient borough and minimise the potential for fluvial and surface flooding by ensuring development does not cause harm to the water environment, water quality and drainage systems. Development should utilise Sustainable Urban Drainage Systems (SUDS) in order to reduce surface water run-off and ensure such run-off is managed as close to its source as possible subject to local geology and ground water levels.

2.13. The Local Plan Chapter 12 relates specifically to Cricklewood, Brent Cross and West Hendon Regeneration Area. Policy C4 – Sustainable Design specifically states that: ‘Development will only be acceptable in floodplains where issues of flood risk have been addressed, in line with PPG25, and both environmental and ecological mitigation have been agreed with the Environment Agency. These may include providing more flood water storage outside the floodplain. The council would welcome the application of the innovative, sustainable principles of the Millennium Villages’.

**London Borough of Barnet Local Flood Risk Management Strategy, May 2017**

2.14. As a Lead Local Flood Authority, the London Borough of Barnet Council has a responsibility for leading the co-ordination of local flood risk management within the London Borough of Barnet. This includes ensuring that flood risks from local sources, including surface water runoff, groundwater and ordinary watercourses and their interactions, are identified and managed. The London Borough of Barnet Council have the duty to put in place a Local Flood Risk Management Strategy (hitherto referred as a ‘Local Strategy’) to manage all sources of local flood risks consistent with EU and national risk management approaches.

2.15. This Local Strategy sets out to achieve the following:

- Produce a summary of local flood risk within the London Borough of Barnet;
- Identify the roles and responsibilities of Risk Management Authorities;
- Demonstrate The London Borough of Barnet Council’s position as a Lead Local Flood Authority;
- Outline the national and local objectives and measures for managing flood risk within Barnet; and
- Identify the possible funding sources and the feasible implementation approaches.

2.16. The Local Strategy outlines ten local objectives. These local objectives have been developed to be consistent in line with the national objectives, which have been previously outlined in the National Flood and Coastal Erosion Risk Management Strategy and have been developed in collaboration with the relevant Risk Management Authorities. These objectives are outlined below:

- Prevent risks of flooding in new developments;

Promote flood resistance and resilience;

Evaluate maintenance and update the flood risk asset register;

Prepare emergency plans for flood warnings and alerts, efficient response to flood incidents and emergency recovery following a flood incident;

Establish and maintain long term partnership working, both internally within Barnet Council departments and externally with other Risk Management Authorities;

Update and review hydraulic modelling of Critical Drainage Areas;

Modelling of Barnet catchment sewerage network;

Develop, maintain, apply and monitor a strategy for local flood risk management of the area;

Prepare flood hazard maps and flood risk map;

Prepare flood hazard maps and flood risk maps; and,

Prepare flood risk management plan.

- 2.17. The Local Strategy identifies numerous measures to be taken to achieve the ten local objectives and highlights how the Council can work in partnership with other Risk Management Authorities in order to deliver measures to mitigate local sources of flooding.

**Strategic Flood Risk Assessment Level 1 for London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow, version 1.4, April 2018**

- 2.18. The purpose of the Strategic Flood Risk Assessment Level 1 Report is to provide the key information with regards to flood risk, planning application and developments mainly for developers, planning consultants and Local Planning Authority officers.

- 2.19. The aim of the SFRA is to provide the evidence base for ensuring development is steered away from areas identified most at risk from various flood sources, reducing the risk of flooding to its residents and buildings.

- 2.20. In Chapter 4, the document also covers specifications regarding Flood Risk Assessment at major and minor development sites:

FEA for major development:

- The Sequential Test only needs to be applied for development proposals in Flood Zone 1 if the SFRA and accompanying Web Map indicates there may be existing flood issues from other sources or flood issues in the future. This information may also come from other sources.
- Flood risk from all sources should be assessed, including the potential impacts of climate change over the development's lifetime. The EA's latest climate change allowances must be used when assessing peak river flows, sea level rises and peak and rainfall intensities.
- Where a site-specific FRA is required, predicted flood depths should be analysed and appropriately mitigated. Mitigation may include (but not be limited to) flood resistance measures (where predicted flood depths are less than 0.3m) or flood resilience measures (where predicted flood depths are greater than 0.6m). Predicted flood depths between 0.3m and 0.6m should be analysed on a case-by-case basis to determine if resistance measures are sufficient. Design plans should show floor levels (relative to Ordnance Datum) and predicted flood depths.
- The drainage strategy requires information on the proposed SuDS and surface water runoff discharge destination in line with Policy 5.13 of the London Plan.

FRA for minor development:

- The Sequential Test only needs to be applied for development proposals in Flood Zone 1 if the SFRA and accompanying Web Map indicates there may be existing flood issues from other sources or flood issues in the future. This information may also come from other sources.
- A site-specific FRA are required for new Minor developments in if other sources of flooding, other than fluvial and tidal flooding, may impact the development. All Minor developments within EA identified critical drainage problem areas will require a site-specific FRA (note that there are currently no areas that fall within EA critical drainage problem areas in the study area). The EA's latest climate change

allowances must be used when assessing peak river flows, sea level rises and peak rainfall intensities.

- o Where a site-specific FRA is required, predicted flood depths should be analysed and appropriately mitigated. Mitigation may include (but not be limited to) flood resistance measures (where predicted flood depths are less than 0.3m) or flood resilience measures (where predicted flood depths are greater than 0.6m). Predicted flood depths between 0.3m and 0.6m should be analysed on a case-by-case basis to determine if resistance measures are sufficient. Design plans should show floor levels (relative to Ordnance Datum) and predicted flood depths.
- o A drainage strategy is required for all Minor developments which modify existing surface water drainage. Strategies must be proportional to the scale of the development.

2.21. The Sequential Test will need to be applied to steer the entire proposed site to the areas with the lowest risk of flooding. If the Exception Test is required, application is based on the highest flood risk zone the site is in and will need to be passed for the planning application.

#### Climate Change Allowance

2.22. Climate change allowance for rainfall intensity, in the Planning Practice Guidance, were updated in May 2022. Climate change allowances are now broken down into management catchments. To allow for the predicted impacts of climate change on surface water runoff within the London Management Catchment, the following increases detailed in Table 2-1 below to rainfall intensity should be allowed for. For residential developments the minimum lifetime is 100 years and the upper end allowances should be used.

Table 2-1: London Management Catchment Peak Rainfall Allowances

3.3% (1 in 30-year) Annual Exceedance Rainfall Event		
Epoch	Central Allowance	Upper End Allowance
2050s	20	35
2070s	20	35
1% (1 in 100-year) Annual Exceedance Rainfall Event		
Epoch	Central Allowance	Upper End Allowance
2050s	20	40
2070s	25	40

2.23. Therefore, under the NPPF an allowance of 40% for the effects of climate change for the 1% annual exceedance rainfall event would achieve the policy requirements in designing the drainage elements the proposed residential redevelopment (the design event).

### Sequential Test

2.24. The objective of the Sequential Test is to steer new developments toward areas with the lowest probability of flooding. Where there are no reasonably available sites in lower flood risk areas, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in higher flood risk areas.

2.25. As the site is shown to be located within Flood Zone 1 of the Environment Agency flood mapping (as discussed in Section 4) and it's not at risk of any other flood risk sources, it should not be necessary for the site to undergo the Sequential Test.

### Exception Test

2.26. Table 2 'Flood risk vulnerability classification' of the PPG describes the proposed development (commercial, business and service) as 'Less Vulnerable'. Table 3 of the PPG replicated overleaf in Table 2-1, confirms that the Exception Test is not required for 'Less Vulnerable' uses in Flood Zone 1.

Table 2-2: Extract from PPG - Table 3 Flood Risk Vulnerability

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

- ✓ Exception test is not required
- X Development should not be permitted

### 3. Baseline Conditions

#### Topography

- 3.1. A 1m LiDAR downloaded in October 2023 shows the site slopes in a southerly direction. Elevations across the site are in the order of 51.2mAOD in the north corner of the site to 48.5mAOD on the south boundary. The average ground level slope for the site is approximately 1:36. See Figure 3-1 for details.



Figure 3-1: Ground elevation

#### Hydrology

- 3.2. The Environment Agency's (EA) online main river map shows that the nearest main river – River Brent is located approximately 1.25km to the north-west. There are no main or ordinary watercourse in the proximity of the site.

#### Ground Conditions

- 3.3. A review of British Geological Survey (BGS) mapping shows the bedrock of the proposed site as The London Clay formation mainly composed of clay, silt and sand. An extract from BGS mapping is shown in Figure 3-2.



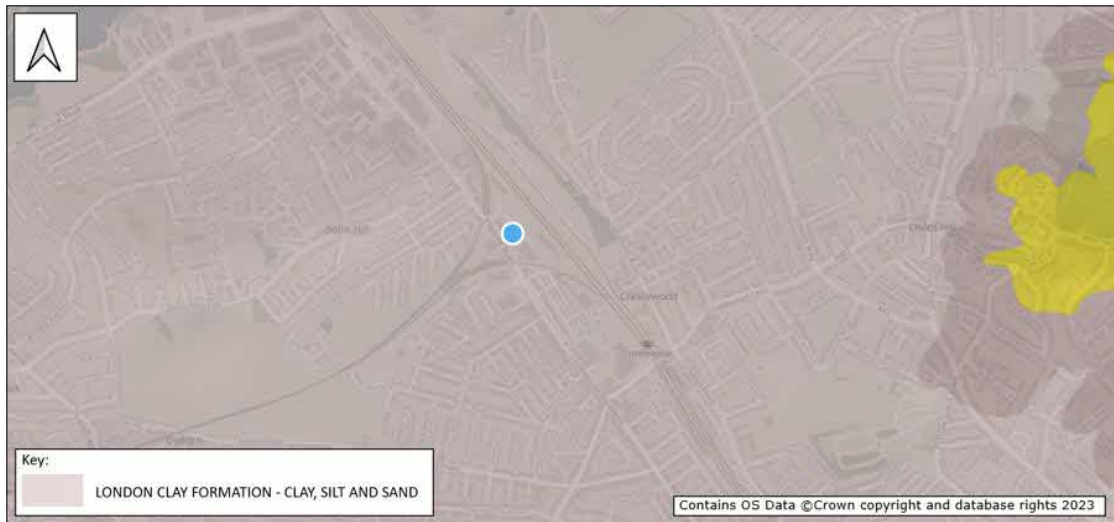


Figure 3-2: BGS Online Geology Mapping Bedrock Geology

- 3.4. A review of British Geological Survey (BGS) borehole record mapping shows number of boreholes west and east of the site. The closest borehole TQ28NW487 located west has been drilled June 2023 at the ground level of 53m AOD.
- 3.5. The ground conditions encountered compared reasonably well to those provided from BGS mapping. In summary the ground conditions comprised of made-up ground (tarmac, bricks, tiles and some contaminates) in thickness of 7mbgl, light brown clay in thickness from 7mbgl to 16mbgl, blue/grey clay in thickness from 16mbgl to 58mbgl, Lambeth group in thickness from 58mbgl to 68mbgl, with some sand, chalk and flints down to 130mbgl.
- 3.6. Groundwater is not encountered at this borehole. Based on the borehole located approximately 0.07km southwest of the site (TQ28NW409), the groundwater level is at 27.05mbgl.

## 4. Sources of flooding

- 4.1. The NPPF requires flood risk from the following sources to be assessed, each of which are assessed separately below:

Historic Flooding;

Tidal sources (flooding from the sea);

Fluvial sources (river flooding);

Pluvial sources (flooding resulting from overland flows);

Groundwater sources;

Sewer flooding;

Artificial sources, canals, reservoirs etc.; and,

It also requires the risk from increases in surface water discharge to be assessed (surface water management).

### Historic Flood Incidences

- 4.2. Based on the information available on the Environment Agency Historic Flood Map, it appears that there have been no recorded flood incidents in the area.

### Flood Zone Designation

- 4.3. Flood Zones refer to the probability of river and sea flooding, ignoring the presence of defences. The NPPF Planning Practice Guidance defines Flood Zones as follows:

Flood Zone 1: Low Probability. Land having a less than 1 in 1,000 annual probability of river or sea flooding;

Flood Zone 2: Medium Probability. Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding;

Flood Zone 3a: High Probability. Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding; and

Flood Zone 3b: The Functional Floodplain. This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessment areas of functional

floodplain and its boundaries accordingly, in agreement with the Environment Agency.

### Fluvial and Tidal Flooding

- 4.4. The West London Strategic Flood Risk Assessment Policy Map shows the entire site is located in Flood Zone 1. See Figure 4-1 below.

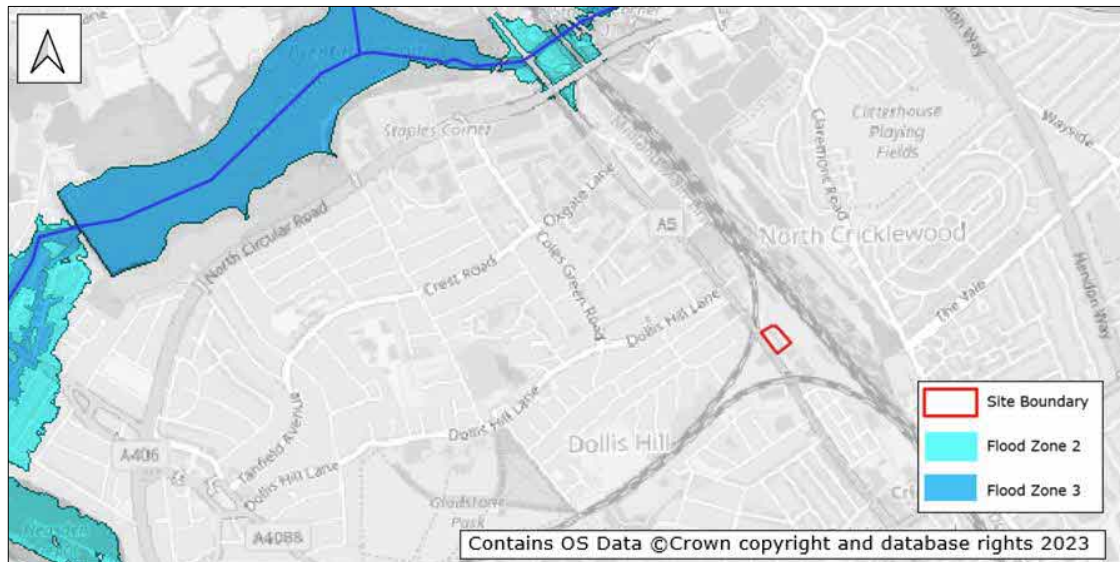


Figure 4-1: Environment Agency Flood Map for Planning

### Pluvial Flooding

- 4.5. The West London Strategic Flood Risk Assessment Policy Map surface water mapping shows the surface water flooding within the site for the 1 in 30 year, 100-year and 1000-year events which mimics the EA surface water flood map.
- 4.6. The EA's surface water flood maps (Figure 4-2) show that the majority of the site has a 'very low' risk of surface water flooding, meaning that there is less than a 0.1% chance of flooding from surface water flooding each year.
- 4.7. High risk of surface water flooding on site with depth of up to 300mm is likely to occur along the northeast side of the existing building. Low risk of surface water flooding with depths of up to 300mm occurs at the southeast side of the existing building.
- 4.8. Although there have been two areas of surface water flooding on the site, these could be attributed to the ground model used within the hydraulic model, and hence the surface water risk at the site is considered to be low.



Figure 4-2: Environment Agency Flood Map for Surface Water

4.9. The requirements for a site specific Drainage/SuDS Strategy will be assessed by others.

### Groundwater Flooding

4.10. The West London Strategic Flood Risk Assessment Policy Map shows the site is located outside of an area susceptible to groundwater flooding. The SFRA also reports no records of Increased Potential for Elevated Groundwater flooding. See Figure 4-3.

4.11. The borehole TQ28NW409 report confirms groundwater level west of the site at a level of 27.05mbgl.

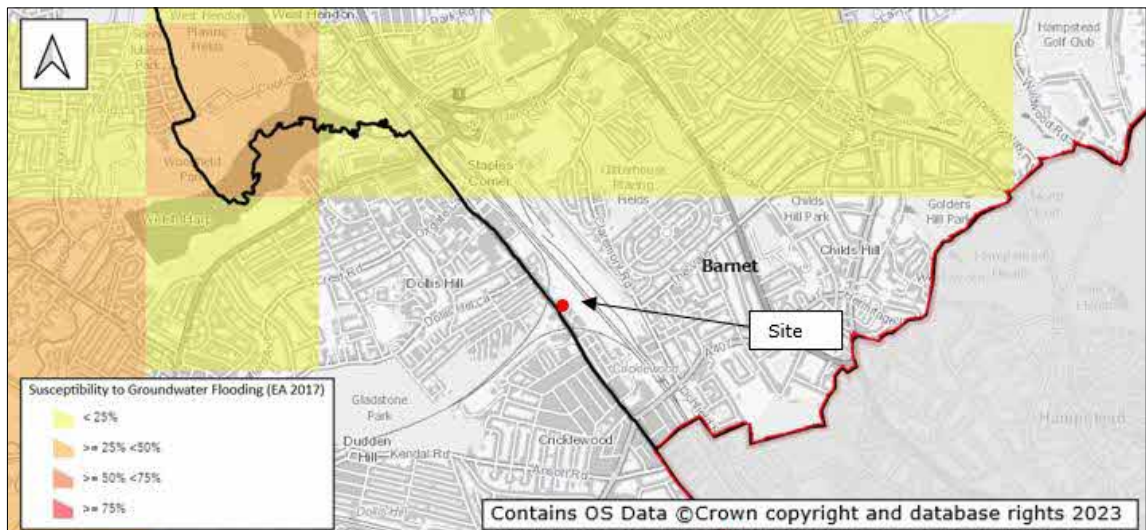


Figure 4-3: Areas susceptible to groundwater flooding

4.12. Therefore, the risk of groundwater flooding at the site is regarded as low.

#### Sewer Flood Risk

4.13. The West London Strategic Flood Risk Assessment Policy Map shows the site is located outside of the Thames Water 2017 Sewer Flooding Record. See Figure 4-4.

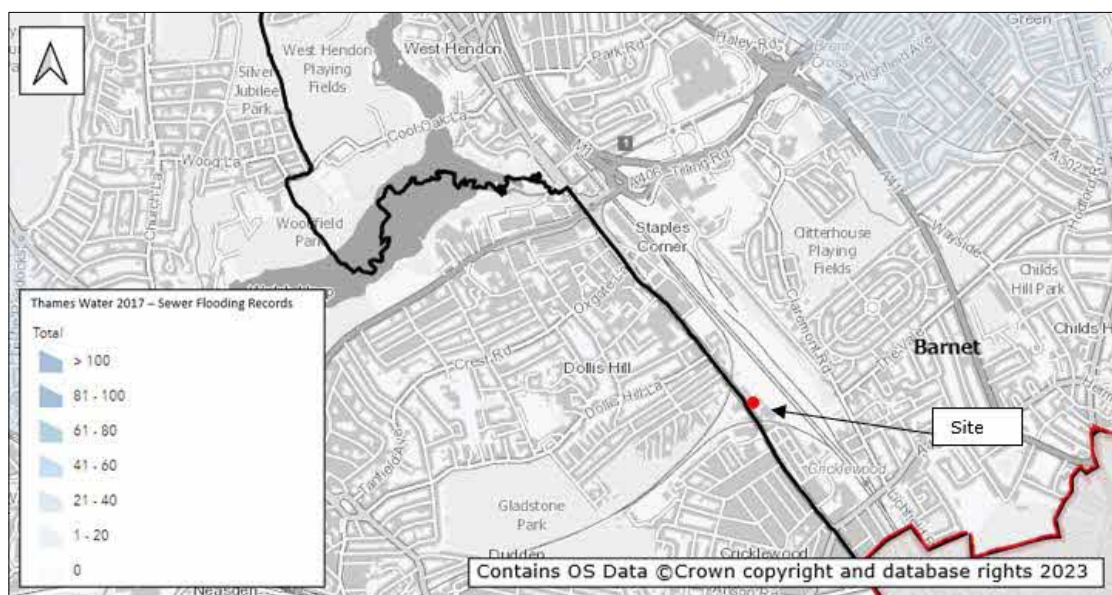


Figure 4-4: Thames Water 2017 – Sewer Flooding Record

#### Artificial Sources

4.14. The WHBC SFRA artificial sources flood mapping shows the site is not located in an area at risk of flooding from artificial sources.

4.15. According to the Environment Agency's Flood risk from reservoir map, the site is not in an area at risk of flooding from artificial sources. Environment Agency and OS mapping indicates no nearby canals, reservoirs or similar artificial potential sources of flood risk in the nearby vicinity and upgradient of the site.

### Critical Drainage Areas

4.16. The West London Strategic Flood Risk Assessment Policy Map shows the site is located outside of the Critical Drainage Areas. See Figure 4-4.

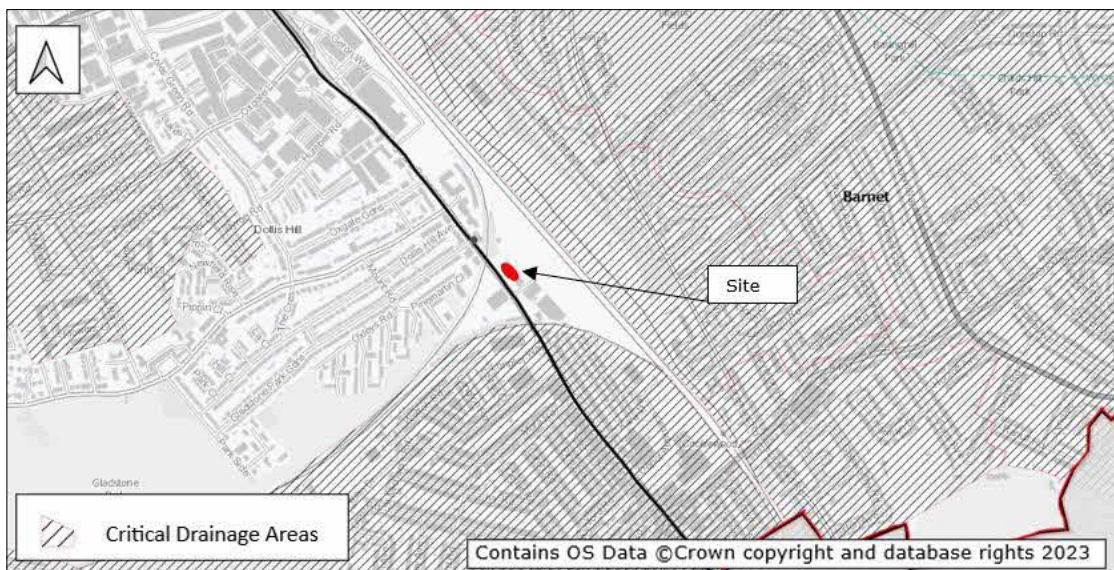


Figure 4-5: Critical Drainage Areas

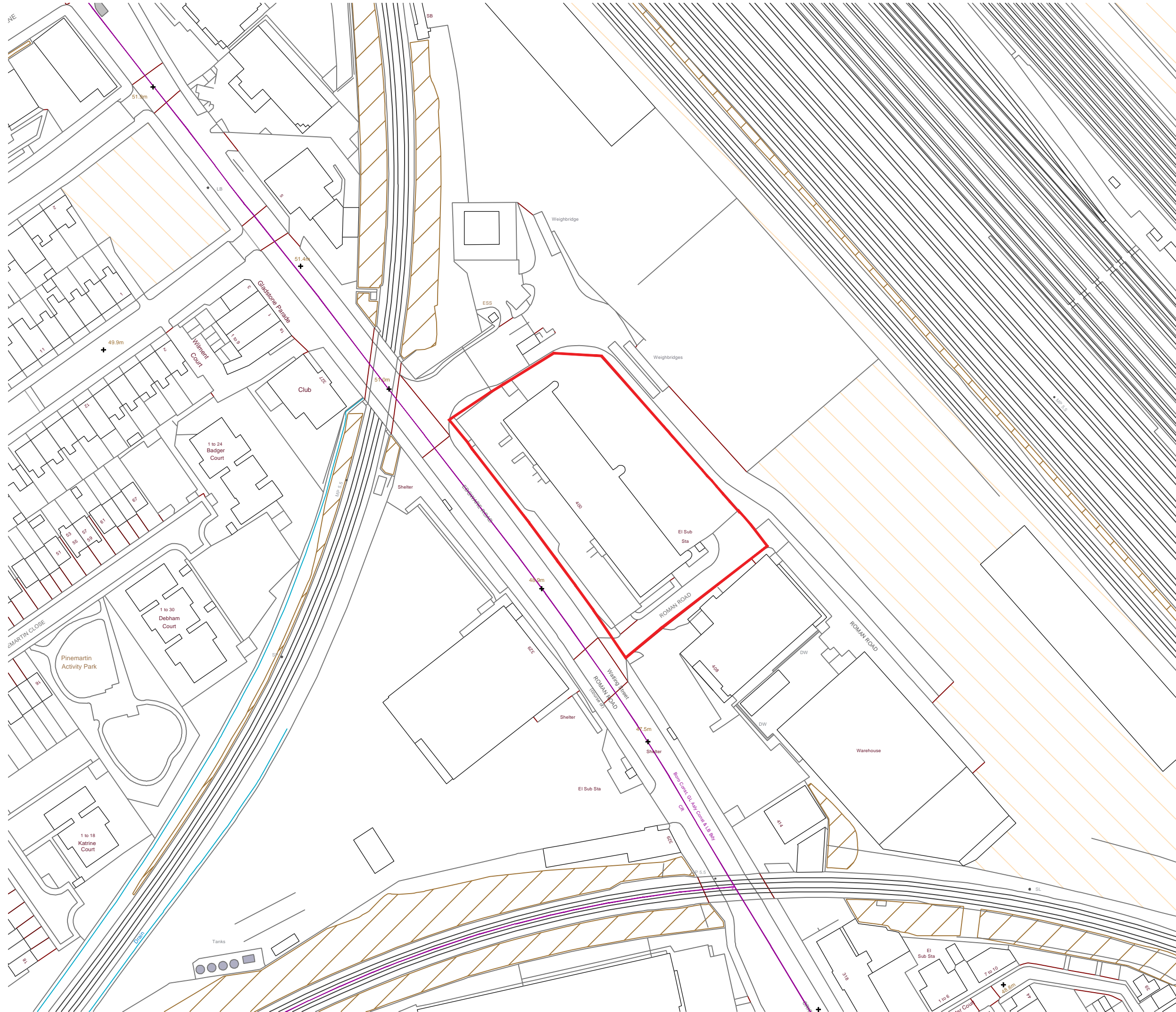
4.17. Given that the flood risk from any sources on site is classified as low, it is deemed that no mitigation measures are required at this time.

## 5. Conclusions

- 5.1. Ardent Consulting Engineers has been commissioned by Cricklewood PropCo Limited to undertake a Flood Risk Statement for the proposed redevelopment of 400 Edgware Road, Cricklewood.
- 5.2. The Site is not situated within a Conservation Area, nor does it comprise a Listed Building and there are no heritage assets nearby.
- 5.3. The Proposed Development comprises 'Erection of rear extension to provide additional self-storage floorspace (Use Class B8) with associated car and cycle parking, landscaping and other works ancillary to the development.'
- 5.4. The site is located in Flood Zone 1 and it's not at risk of any other flood risk sources. Therefore, it is not necessary to undergo the Sequential Test.
- 5.5. The EA's surface water flood maps show that the majority of the site has a 'very low' risk of surface water flooding, meaning that there is less than a 0.1% chance of flooding from surface water flooding each year.
- 5.6. There are two areas with a high and low risk from surface water flooding along the eastern side of the existing building which can be attributed to the groundmodel used in the surface water modelling and therefore overall surface flood risk on site is considered to be low.
- 5.7. The remaining potential sources of flood risk discussed in the report are considered low/ negligible.
- 5.8. The requirements for a site-specific Drainage/SuDS Strategy will be assessed by others.
- 5.9. Given that the flood risk from any sources on site is classified as low, it is deemed that no mitigation measures are required at this time.
- 5.10. In conclusion, this Flood Risk Assessment demonstrates that the proposals are consistent with the aims of the NPPF. The site will not be at significant risk of flooding or increase the flood risk to others.


## Appendix A

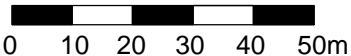


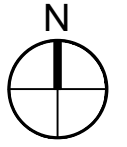


All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately. Do not scale dimensions from this drawings. This drawing is copyright protected.

REVISION		
A	230823	Site boundary updated TF


**SITE BOUNDARY**  
 5871 sqm

**SCALE 1:1250**  




SCALE	DATE	DRAWN	CHECKED
1:1250@A3	May'23	TF	DEA

**PROJECT**  
**KARBON self storage**  
 400 Edgware Road  
 Cricklewood: NW2 6ND

**DRAWING**  
**Site Location Plan**


  
 10 MONTROSE STREET  
 GLASGOW  
 G1 1RE

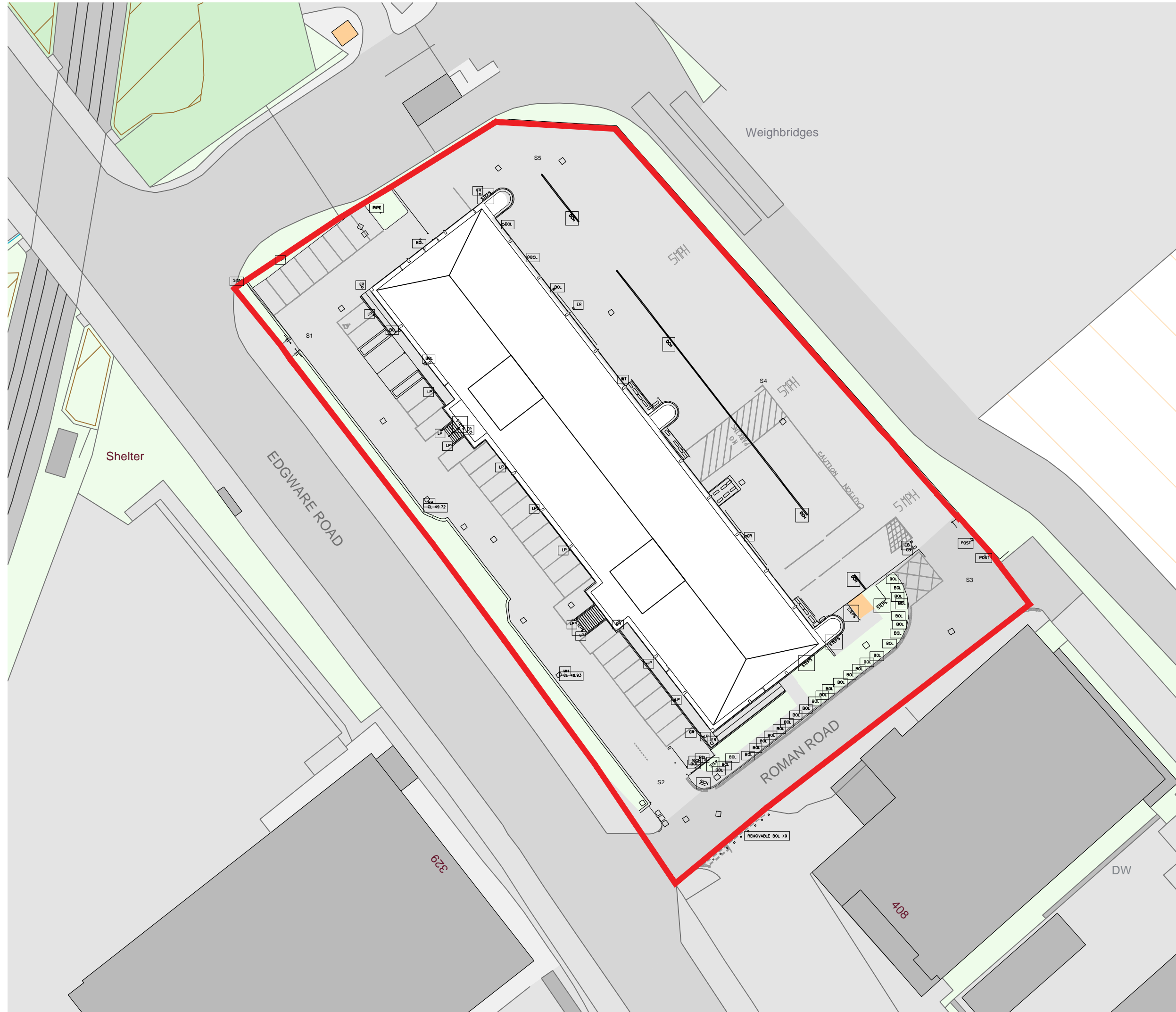
t 0141 229 7575  
 www.360architecture.com


**DRAWING No.**  
**23032GA\_10\_002A**

## Appendix B


All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately. Do not scale dimensions from this drawings. This drawing is copyright protected.

REVISION			
A	18.08.23	Roof plan added	HP GA
B	230823	Site boundary updated	TF



 SITE BOUNDARY  
5871 sqm

SCALE 1:500



SCALE	DATE	DRAWN	CHECKED
1:500@A3	May'23	TF	DEA

PROJECT  
**KARBON self storage**  
 400 Edgware Road  
 Cricklewood: NW2 6ND

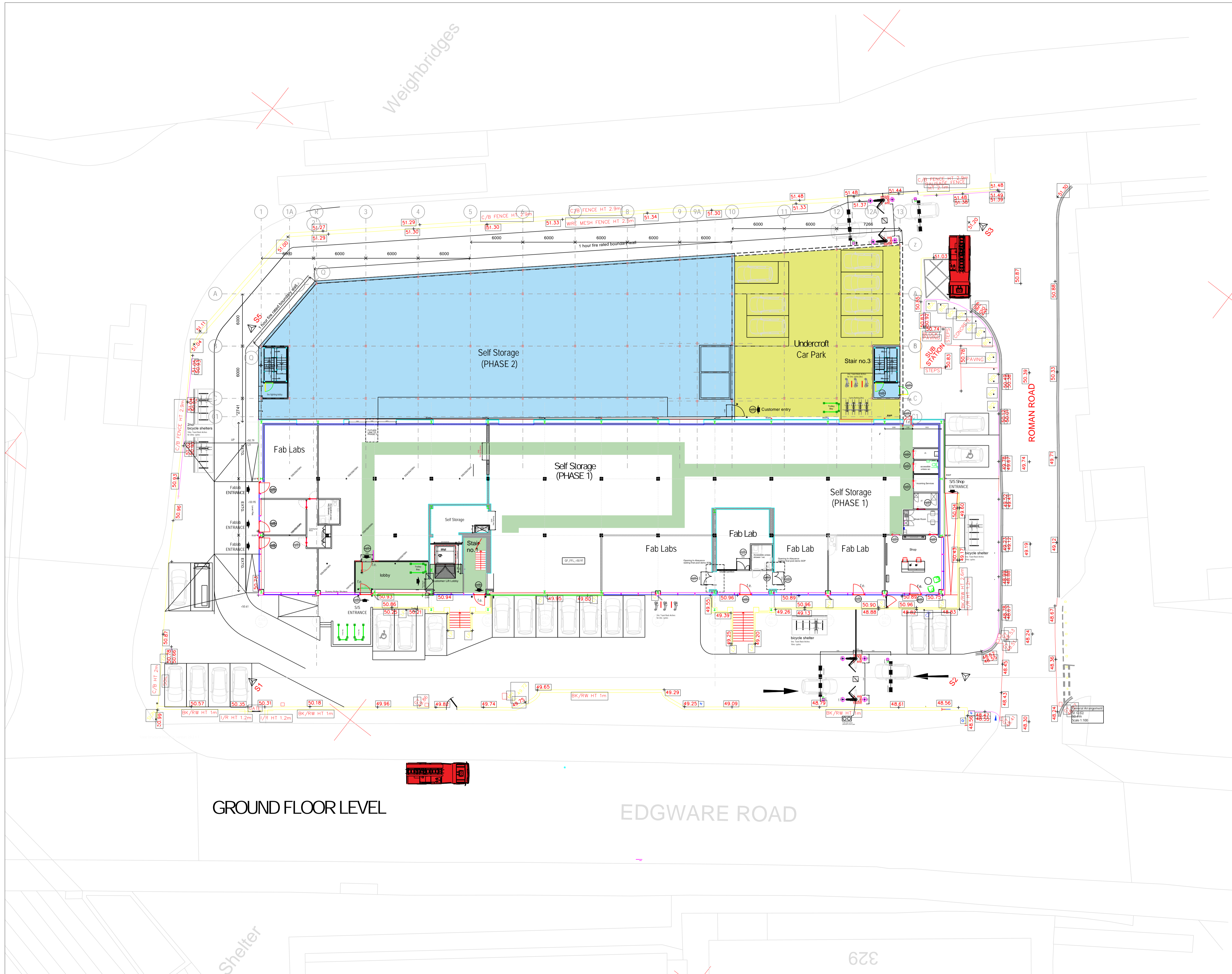
DRAWING  
**Site Plan**  
 as existing

 **Threesixty Architecture**  
 10 MONTROSE STREET  
 GLASGOW  
 G1 1RE t 0141 229 7575  
www.360architecture.com

DRAWING No.  
**23032GA\_10\_003B**

All levels and dimensions to be checked on site prior to construction / fabrication; report discrepancies immediately. Do not scale dimensions from this drawings. This drawing is copyright protected.

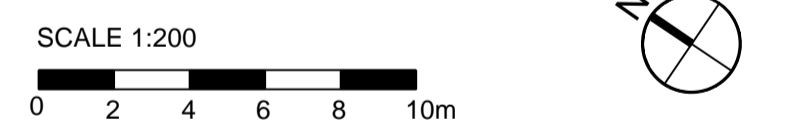
REVISION



EXTENSION

Gross Internal Area	SS GIA
Ground Floor	900msq
Level 01	0msq
Level 02	1243msq
Total	2,143 msq

- Undercroft within Extension
- Proposed Extension
- Existing Building
- Site Boundary - 5871 sqm



**PLANNING**

SCALE	DATE	DRAWN	CHECKED
1:200@A1	JAN'24	HM	TF

PROJECT  
**EQT EXETER**  
 400 Edgware Road,  
 Cricklewood, London: NW2 6ND

DRAWING  
**Proposed Ground Floor Plan**  
 (Extension to existing building)

**Threesixty Architecture**  
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 G1 1RE  
 0141 229 7575  
 www.360architecture.com

DRAWING No.  
**23032GA\_D\_303**