**Matter 11: Have the Plan's strategic policies been informed by robust Strategic Flood Risk Assessment; does the plan seek to manage flood risk from all sources; and is sufficient provision made for flood risk management?**

Issue (i): Have the Plan's strategic (and other) policies been informed by robust Strategic Flood Risk Assessment; does the plan seek to manage flood risk from all sources; and is sufficient provision made for flood risk management?

Council Matter 11 response

11.1 Yes, the Plan's strategic policies have been informed by Merton's Strategic Flood Risk Assessment (SFRA) (15D2-7), as the evidence base for flood risk. The SFRA was undertaken in two parts, level 1 and 2 and was undertaken in partnership with a neighbouring borough, Wandsworth, and in consultation with the Environment Agency and other Risk Management Authorities.

11.2 The flood risk mapping for the SFRA is presented online via a Story Map on Merton's website and shows flood risk for the various sources of flooding. Appropriate allowances have been taken into account for the impacts of climate change. The policies in the Plan seek to manage, mitigate and reduce flooding from all sources including rivers, surface water, groundwater, reservoir and sewer flooding.

11.3 The key updates to the revised Level 1 SFRA (2020) include:

- River Wandle Climate Change Modelling (August 2017)
- Online Flood Risk Mapping (to Support the Level 1 SFRA)
- Areas at risk of perched groundwater in Merton
- Further commentary on areas to safeguard for flood risk management, the cumulative impact of development, and opportunities to reduce the causes and impacts of flooding.

11.4 The mapping to support the Level 1 Strategic Flood Risk Assessment (SFRA) is provided in the Merton SFRA Online Map

11.5 The Level 2 SFRA (15D3 and 15D4) provides (a flood risk) screening assessment of each allocated site within the borough. It provides site specific recommendations on managing flood risk, including the suitability of SuDS. This report will be used to inform development management decisions. Therefore, it is essential that developers have consideration to the SFRA when submitting site specific flood risk assessments (FRAs) and drainage strategies to support planning applications.

**1. How has the Council applied a sequential, risk-based approach to the location of proposed development, as required the Framework[134]?**

[134] At paragraph 161

Council response:

11.6 In line with Paragraph 161 of the NPPF, the Plan has followed a sequential, risk-based' approach to the identification of sites to avoid, where possible, flood risk to people and property and manage any residual risk, taking account of climate change. A Sequential and Exception Test report for the site allocations has been prepared by the London Borough of Merton as part of the Local Plan and this is provided with this Matter 11 as Appendix 1.

11.7 As previously mentioned, the Local Plan is informed by a two stage Strategic Flood Risk Assessment (SFRA). The Level 1 SFRA provides an overview of the risk of flooding from all sources across London Borough Merton, including flooding from rivers, surface water, groundwater, sewers and reservoirs, and has been used to assist in the development of policy formulation, strategic planning decisions, and in the application of the Sequential Test. The SFRA was also updated to take account of the new climate change allowances and collates the most up to date and readily available flood risk information for all sources of flooding.

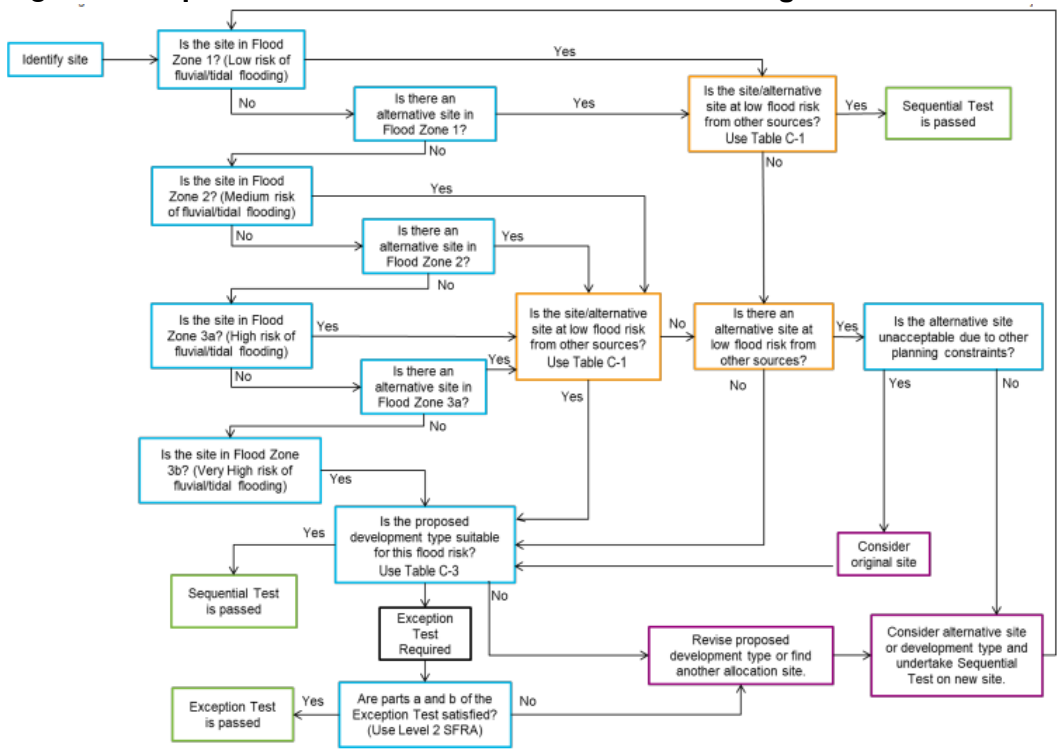
11.8 The methodology for the application of the Sequential Test, as set out in the SFRA, complies with the NPPF. The SFRA and accompanying flood risk mapping has been used to apply the Sequential Test to the site allocations throughout the formulation of the Plan, to ensure development is steered towards areas at lowest risk of flooding from all sources. In doing so, flood risk constraints are considered alongside many other planning issues when identifying suitable areas for development.

11.9 Merton has considered a range of possible sites in conjunction with the flood zone and vulnerability information from the Level 1 Strategic Flood Risk Assessment (SFRA) and applied the Sequential Test.

11.10 A second stage SFRA was undertaken to inform the site allocations, where it was not possible to accommodate all the necessary development outside those areas identified to be at risk of flooding. The Level 2 SFRA was used to support the application of the Exception Test.

11.11 The sequential approach has been applied within the site allocation boundaries to inform site layout by locating the most vulnerable elements of a development in the lowest risk areas. The policies promote the use of low-lying ground in waterside areas for recreation, amenity and environmental purposes which provides an effective means of flood risk management as well as providing connected green spaces with consequent social and environmental benefits.

**Figure 1: Sequential test flowchart from Merton's Strategic Flood Risk Assessment**




**2. Do any of the allocated sites fall within areas at risk of flooding, taking into account all sources of flood risk and climate change?**

Council Response:

11.12 Yes, a number of the allocated sites do fall within an area of flood risk and these have been investigated and assessed in the level 2 SFRA (Documents 15D2, 15D3, 15D4, 15D5, 15D6 ). The Level 2 SFRA provides (a flood risk) screening assessment of each allocated site within the borough. It provides site specific recommendations on managing flood risk including the suitability of SuDS. This report will be used to inform development management decisions. Therefore, it is essential that developers have consideration to the SFRA when submitting site specific flood risk assessments (FRAs) and drainage strategies to support planning applications.

**3. Taking into account the Framework[135], what is the justification for allocating sites in such areas, and how would the Plan ensure that the risk of flooding would not be increased onsite or elsewhere as a result of proposed developments?**

Council Response:

11.13 Merton is a small borough with limited available developable land and extensive protected open space. The majority of the developable and available land in the borough is existing brownfield sites requiring re-development or regeneration and they sit within various flood risk areas. To attempt to attain the housing targets allocated to LB Merton by the GLA (9,180 homes in 10 years 2019-2029) and beyond for the 15-year Local Plan period, it is necessary for us to allow for

[135] Paragraph 164

development of brownfield sites, some of which are located within areas of flood risk. These developments would see wider sustainability benefits such as provision of much needed affordable housing, provision of infrastructure including community space, public realm improvements and, in some cases, a mix of uses that would support businesses and jobs. Of the sites within other flood risk areas, these are largely within FZ2 and partially FZ3. In our most recent Level 2 SFRA (Feb 2021- Documents 15D3 to 15D6) we have provided detailed site-specific recommendations for managing flood risk for these new developments, to ensure that at planning application stage, flood risk is not increased on or off site.

11.14 The Plan ensures that the risk of flooding would not be increased onsite or elsewhere with the inclusion of the flood management policies. Policies F15.7 Flood Risk Management and Sustainable Drainage, F15.8 Managing Local Flooding and F15.9 Sustainable Drainage Systems (SUDS) are informed by the SFRA and the development recommendations of the SFRA. We have also attached the sequential and exception test carried out for the borough and this is appended to this Matter 11.

**4. Following on from the questions immediately above, would any allocated sites located in areas at higher risk of flooding be required to locate the most vulnerable development in areas of lowest flood risk within the site, unless there are overriding reasons to prefer a different location[136]?**

Council Response:

11.15 Yes, some of the allocated sites are in areas at higher risk of flooding and will be required to locate the most vulnerable development in areas of lower flood risk on the site, in accordance with the sequential approach to site layout. An example of this is site allocation RP6 LESSA Sports Ground.

11.16 For this site, the SFRA makes recommendations on how these types of developments can be brought forward for development, reducing risk to life, reducing flood risk at site and elsewhere.

11.17 The SFRA Level 2 site appraisal for RP6 states that a sequential approach should be applied within the site, locating development entirely within those areas in Flood Zone 1 and at lower risk of surface water flooding. Development is not permitted in areas of Flood Zone 3b Functional Floodplain in the southwest part of the site, and development should be avoided in the modelled flood extent for the 1% AEP event including climate change. No ground raising should take place.

**5. Does the plan effectively take into account the potential flood risk impacts on, and of basement developments, and their potential cumulative effects?**

Council Response:

11.18 Yes, the plan effectively takes into account the potential flood risk impacts on, and of basement developments, and their potential cumulative effects. Policy

[136] Per paragraph 167(a) of the Framework

D12.11 Basements and Subterranean Design ensures that basement proposals in Merton do not increase flooding to and from the site, from all sources of flooding.

11.19 The policy requires all basement applications to be accompanied by a Basement Impact Assessment (BIA), a Drainage Strategy and an outline Construction Method Statement (CMS).

11.20 Part j. of the policy requires the basement to be designed to minimise the risk of internal flooding, such as through appropriate waterproofing techniques, non-return valves, raised thresholds etc.

11.21 Further, to reduce the impact elsewhere, the proposal must include sustainable urban drainage (SuDS) to reduce runoff rate and conserve and re-use water such as through rainwater harvesting measures.

11.22 In terms of cumulative impacts, the supporting Basement SPD requires site specific ground investigation to be undertaken to inform the supporting submission documents such as the BIA, CMS and Drainage Strategy. Mitigation measures to reduce the risk of cumulative impacts, such as groundwater level rises on or off the site, could include passive drainage measures to allow the free flow of groundwater around the basement structure.

**6. In its Regulation 19 Response, Thames Water advocates reference to the need to install suitable positively pumped devices in relation to any installations in basement proposals that would discharge to the sewerage network. Should reference be made to this issue in Policy D12.11 or its supporting text to ensure that the risk of flooding from this source would not be increased on the site or elsewhere?**

Council Response:

11.23 Further to Thames Water's Regulation 19 Response, the council held a follow up meeting with Thames Water on 5th October 2021 to discuss the comments raised. The council agrees that reference should be made to the need to install suitable positively pumped devices in relation to any installations in basement proposals that would discharge to the sewerage network. We therefore propose a modification to include this within Policy D12.11 Basements and subterranean design and is listed as modification MM12.1. This modification is required to ensure the Local plan is justified and effective.

**Proposed modification**:

Policy D12.11:

j. Basements or subterranean development must be designed to minimise the risk of internal flooding and must not increase the risk of flooding elsewhere. Proposals must include sustainable urban drainage scheme to reduce runoff rates and implement proposals to conserve and re-use water through rainwater harvesting. Where basements discharge to the sewer network, they must install suitable

positively pumped devices.

**MATTER 11 - APPENDIX 1**

# London Borough of Merton

# Flood Risk – Updated Sequential and Exception Test of Site Allocations

## Publication Version of the Local Plan

## 2022

(If you print this document onto paper, please use ‘scale to fit’ setting)

# 1 Introduction

1.1 This report sets out and demonstrates how the borough has applied the Sequential and Exception Tests in accordance with the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (PPG) to the site allocations within the London Borough of Merton's new Local Plan.

1.2 The Sequential Test is designed to steer development to areas at low risk from flooding, in preference to areas at higher risk, and should be applied to all prospective development areas and sites. As part of the evidence base for the Local Plan, the council is required to apply the Sequential Test. In doing so, flood risk constraints are considered alongside many other planning issues when identifying suitable areas for development.

1.3 This Sequential Test report has been prepared by the London Borough of Merton as part of the Local Plan hereby referred to as the Plan.

1.4 The sequential test, is a risk-based approach to the location of development 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, taking climate change into account.

1.5 Merton Council must demonstrate that it has considered a range of possible sites in conjunction with the flood zone and vulnerability information from the Level 1 Strategic Flood Risk Assessment (SFRA) and applied the Sequential Test, and where necessary, the Exception Test (Level 2 SFRA), in the site allocation process.

# 2 Merton's Local Plan

2.1 Merton's Local Plan seeks to promote 'Good Growth' in line with the London Plan Good Growth principles and polices. By, building strong inclusive communities, making the best use of land, creating a healthy city, building more homes and affordable housing to address the housing crisis, growing and maintaining a strong economy, increasing efficiency and resilience by moving towards a net-zero carbon city by 2050 and adapting to the impacts of climate change.

2.2 Dealing with this level of growth will be a huge challenge, putting pressure on land, housing, infrastructure and the environment. It also comes as we are and have faced other unprecedented challenges such as Brexit and Coronavirus (COVID-19) pandemic.

2.3 The Local Plan seeks to ensure that Merton's future growth is, planned in a sustainable way in accordance with the National Planning Policy framework (NPPF), London Plan and its Good Growth principles. This includes maintaining a good balance between economic, social and environmental objectives, creating liveable attractive places for people to live, study, work and visit, as well as delivering our ambition of becoming a net-zero carbon borough by 2050, and creating resilient and adaptive environments, in response to the Climate Emergency for the benefit of all in Merton.

2.4 The Local Plans states that the effects of growth will be considered, ensuring that any significant impact is avoided, or necessary mitigation measures employed. Delivering high quality, sustainable and resilient places through good design and effective master planning and/or Neighbourhood Plans will be essential for future growth in Merton.

2.5 The growth in population and jobs has not been matched by the growth in the number and type of homes, especially affordable housing to meet the needs in Merton. A major barrier to potential growth is our limited available developable land. The borough has over 1300 hectares of open space which makes up 35% of the borough. The council housing target has significantly increased, and 9,180 homes are to be built in Merton by 2029, as set out in the London Plan 2021 and to meet the Local Plan's 15-year housing needs.

2.6 Furthermore, the London Plan has identified an Opportunity Area (OA) in Merton. This OA runs from Wimbledon, South Wimbledon, Colliers Wood and Morden. The London Plan ambition for is to deliver 5000 new homes and 6000 jobs (indicative figure up to 2041). It should, be noted that these figures form the starting point and the ambition for the OA is not, predicated on the delivery of Crossrail 2. All of this with a backdrop of limited available developable land as stated earlier in this report.

# 3 Background and planning context

### Local Plan consultations

3.1 The council held a public consultation called Call for Sites, as part of this consultation the council was seeking sites for development. The council

received nominations for 68 sites to be considered for allocation and land use designation in the Local Plan. This included sites that were allocated in the previous Local Plan which were not started but are still available, suitable and deliverable. These were manly council owned sites.

3.2 The next step for the council was to assess each site for constraints such as flooding from all sources and flood zones designations. The purpose of this exercise was to establish if, a site was suitable for development. Where constraints were identified we asked could this be overcome through mitigation measures and importantly and if yes, would the site have potential to deliver sustainable benefits (economic, environmental and social).

1.

3.3 Sites that were not suitable for allocation were not taken forward. Again, at the stage 2 public consultation, a further 5 sites were proposed for allocation. The council repeated the same process as at the Call for Sites stage, reviewing the constraints and if, the site was available, suitable and deliverable. As the Local Plan developed, a number of sites dropped out of the Local Plan. The reasons were varied:

- Landowner no longer wanted the site allocated
- Unable to contact the landowner of the nominated site
- It was established the site could not be delivered within the Plan period
- Site was not suitable, available or deliverable
- A number of constraints
- Site was granted planning permission

3.4 The tables and assessments below contain all the sites that were contained in the Local Plan at Stage 3 (Regulation 19) publication between July and September 2021.

3.5 Merton's Local Plan was submitted to the Secretary of State on 2nd December 2021

# 4 Application of the Sequential Test in Plan Making

4.1 As mentioned earlier in this report, as part of the evidence base for the Local Plan the council is obliged to apply the Sequential Test where appropriate. In doing so, flood risk constraints are considered alongside many other planning issues when identifying suitable areas for development.

4.2 Merton Council, as the plan maker, must demonstrate that it has considered a range of possible sites in conjunction with the flood zone and vulnerability information from the Level 1 Strategic Flood Risk Assessment (SFRA) and applied the Sequential Test, and where necessary, the Exception Test (Level 2 SFRA), in the site allocation process.

# 5 Methodology

5.1 The flood zones as refined in the Strategic Flood Risk Assessment for the borough, provide the basis and evidence for applying the Sequential Test. The aim is to steer new development to Flood Zone 1 (areas with a low probability of river flooding).

5.2 Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river flooding), applying the Exception Test if required.

5.3 Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river flooding) be considered, considering the flood risk vulnerability of land uses and applying the Exception Test if required. In Merton, there are no areas of the borough affected by sea or tidal flooding.

5.4 Within Merton's Level 1 SFRA (Appendix C), Table C-1 shows the flood risk definitions for all sources of flooding (i.e. not only river flooding associated with flood zones) in order to support with the application of the Sequential Test. Figure C-1 in the Level 1 SFRA illustrates risk based approach and methodology for applying the Sequential Test for sites which Merton has adopted in the allocation of sites as part of the preparation of the Local Plan.

5.5 The Sequential Test requires an understanding of the flood zones in the study area and the vulnerability classification of the proposed developments. Flood zone definitions are provided in Table 4-1 or Table 5-2.

5.6 To ensure Merton uses the most up to date flood risk data and evidence, Merton developed an interactive online ArcGIS Story Map to support the Level 1 SFRA

5.7 Flood risk vulnerability classifications are defined in PPG Table 2 and are presented in Table C-2.

5.8 The Sequential Test should be undertaken by each London Borough and accurately documented to ensure decision making processes are consistent and transparent to all.

Table 1: Flood risk vulnerability classification (NNPF Annex 3)

| | |
|---|---|
| Essential Infrastructure | • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk, and strategic utility infrastructure, including electricity generating power stations and grid and primary substations. |
| Highly Vulnerable | • Police stations, Ambulance stations and Fire stations and Command Centres and telecommunications installations required to be operational during flooding.<br>• Emergency dispersal points.<br>• Basement dwellings.<br>• Caravans, mobile homes and park homes intended for permanent residential use.<br>• Installations requiring hazardous substances consent. |
| More Vulnerable | • Hospitals.<br>• Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.<br>• Buildings used for: dwelling houses; student halls of residence; drinking establishments; nightclubs; and hotels.<br>• Non–residential uses for health services, nurseries and educational establishments.<br>• Landfill and sites used for waste management facilities for hazardous waste.<br>• Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan. |
| Less Vulnerable | • Buildings used for: shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non–residential institutions not included in 'more vulnerable'; and assembly and leisure.<br>• Land and buildings used for agriculture and forestry.<br>• Waste treatment (except landfill and hazardous waste facilities).<br>• Minerals working and processing (except for sand and gravel working).<br>• Water treatment plants.<br>• Sewage treatment plants (if adequate pollution control measures are in place). |
| Water-compatible Development | • Flood control infrastructure.<br>• Water transmission infrastructure and pumping stations.<br>• Sewage transmission infrastructure and pumping stations.<br>• Sand and gravel workings.<br>• Docks, marinas and wharves.<br>• Navigation facilities.<br>• MOD defence installations.<br>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.<br>• Water-based recreation (excluding sleeping accommodation).<br>• Lifeguard and coastguard stations.<br>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.<br>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan. |

# 6 Stages for the Sequential Test for Plan Making

6.1 The information required to address many of these steps is provided in the accompanying GIS layers and maps presented in Appendix A or the Merton SFRA Online Map.

1. Identify potential development sites and assign a unique ID reference.

2. Assign each potential development with a vulnerability classification (Table C-2 of SFRA). Where development is mixed, the development should be assigned the highest vulnerability class of the development proposed.

3. Determine the Flood Zone classification of each site based on a review of Appendix A Figure 1, Merton SFRA Online Map or the Flood Map for Planning (Rivers and Sea). Where a site covers more than one flood zone, all flood zones should be noted.

4. Identify existing flood defences serving the potential development sites. (However, it should be noted that for the purposes of the Sequential Test, flood zones ignoring defences should be used).

5. Identify the design life of the potential development, to determine the time horizon over which the impact of climate change should be considered: · 100 years – up to 2120 for residential developments; and · Design life for commercial / industrial developments will be variable, however at least a 60 year design life48 should be assumed for such development, unless demonstrated otherwise.

6. Highly Vulnerable developments to be accommodated within the LPA area should be located in those sites identified as being at Low Risk (Table C-1 of SFRA). If these cannot be located in areas at Low Risk because the identified sites are unsuitable or there are insufficient sites in Low Risk areas, sites in Medium Risk (Table C-1) can then be considered. Highly Vulnerable developments in Flood Zone 2 will require application of the Exception Test. If sites at Medium Risk are inadequate, then the LPA may have to identify additional sites at Medium Risk to accommodate development or seek opportunities to locate the development outside their administrative area. Within each area Highly Vulnerable development should be directed, where possible, to the areas at lowest risk from all sources of flooding. It should be noted that Highly Vulnerable development is not appropriate in Flood Zones 3a and 3b.

7. Once all Highly Vulnerable developments have been allocated to a development site, the LPA can consider those development types defined as More Vulnerable. In the first instance More Vulnerable development should be located in any unallocated sites in a Low Risk area (Table C-1). Where these sites are unsuitable or there are insufficient sites remaining, sites at Medium Risk (Table C-1) can be considered. If there are insufficient sites in Low or Medium Risk to accommodate More Vulnerable

development, sites in High Risk can be considered. More 48 Mayor of London, 2014, Sustainable Design and Construction SPG, London Plan 2011 Implementation Framework. Level 1 Strategic Flood Risk Assessment Project number: 60620167 Prepared for: London Borough of Wandsworth AECOM 67 Vulnerable developments in Flood Zone 3a will require application of the Exception Test. As with Highly Vulnerable development, within each area More Vulnerable development should be directed to areas at lowest risk from all sources of flooding. It should be noted that More Vulnerable development is not appropriate in Flood Zone 3b.

8. Once all More Vulnerable developments have been allocated to a development site, the LPA can consider those development types defined as Less Vulnerable. In the first instance Less Vulnerable development should be located in any remaining unallocated sites in Low Risk areas (Table C-1), continuing sequentially with Medium Risk (Table C-1), then High Risk (Table C-1). Less Vulnerable development types are not appropriate in Flood Zone 3b – Functional Floodplain.

9. Essential Infrastructure should be preferentially located in the lowest flood risk zones, however this type of development may be located in Flood Zones 3a and 3b, provided the Exception Test is satisfied.

10. Water Compatible development has the least constraints with respect to flood risk and it is considered appropriate to allocate these sites last. The sequential approach should still be followed in the selection of sites; however, it is appreciated that Water Compatible development by nature often relies on access and proximity to water bodies.

11. Where the development type is Highly Vulnerable, More Vulnerable, Less Vulnerable or Essential Infrastructure and a site is found to be impacted by a recurrent flood source (other than tidal or fluvial), the site and flood sources should be investigated further regardless of any requirement for the Exception Test.

# 7 Exception Test

7.1 Having completed the Sequential Test, the Exception Test aims to provide a method of managing flood risk whilst still allowing necessary development to occur in the interests of sustainable development.

7.2 The National Planning Policy Framework set out the Government's planning policies for England and how these are expected to be applied. The NPPF clearly states the purpose of the planning system is to contribute to the achievement of sustainable development.

7.3 There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- *an economic role* – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- *a social role* – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- *an environmental role* – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

7.4 The purpose of the Exception Test is to ensure that where it may be necessary to locate development in areas at risk of flooding, new development is only permitted in Flood Zone 2 and Flood Zone 3 where the flood risk is clearly outweighed by other sustainability factors and where the development will be safe during its lifetime, considering climate change.

7.5 For the Exception Test to be passed there are two elements to the Exception Test, both of which need to be passed:

1. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared
2. A site-specific Flood Risk Assessment (FRA) must demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flooding elsewhere and where possible reducing flood risk overall

**Flood risk vulnerability classification**

| Flood Zones | Essential infrastructure | Highly vulnerable | More vulnerable | Less vulnerable | Water compatible |
|---|---|---|---|---|---|
| Zone 1 | ✓ | ✓ | ✓ | ✓ | ✓ |
| Zone 2 | ✓ | Exception Test required | ✓ | ✓ | ✓ |
| Zone 3a † | Exception Test required † | ✗ | Exception Test required | ✓ | ✓ |
| Zone 3b * | Exception Test required * | ✗ | ✗ | ✗ | ✓* |

✓ Development is appropriate
✗ Development should not be permitted.

# 8 Conclusion

8.1 The Sequential Test has been applied to 53 proposed site allocations within the borough.

8.2 The conclusions drawn as a result of this report will determine whether the sites are in suitable locations in terms of flood risk and development use. The NPPF outlines that new development should be steered towards land in flood zone 1.

8.3 Out of the 53 sites tested, 38 are wholly located in flood zone 1 and are deemed suitable for all development including residential, commercial and/or industrial uses.

8.4 The remaining 15 sites are affected by one or more of flood zones 2, 3a or 3b.

8.5 Of these 15 sites, 7 are considered to be appropriate for its Flood Zone and not requiring the Exception Test.

8.6 There were no known alternative sites which are currently available in lower risk flood zones. Some of the site allocations had significant portions of the site within FZ1 and/or FZ2, hence when applying the sequential approach to site layout (as per the requirements in the SFRA level 2), the Council would deem the site allocation as being acceptable.

8.7 8 sites were deemed to require the Exception Test. The supporting information as part of the Exception Test (see table and the requirements of the SFRA Level 2 site appraisals), would allow the developments in higher risk zones to be considered suitable and therefore the Sequential Test is considered to be passed for the site allocations. The final column in the table details the Exception Test supporting information and outlines the sustainability factors that outweigh flood risk and how the development will be safe during its lifetime, considering climate change.

8.8 A Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) was carried out at each consultation stage of the Plan (including the site allocations) against the SA objectives.

8.9 A site-specific Flood Risk Assessment, assessing all forms of flood risk would need to be carried out in addition at the application stage. The information provided in this document and associated table below is to demonstrate that both parts of the Exception Text are satisfied for the purposes of plan making for all allocated sites, but that individual development sites would still need to demonstrate part two through an appropriate site-specific Flood Risk Assessment, as part of a Planning Application.

8.10 The information presented in the document does not preclude the potential for mitigation requirements that require careful consideration at the planning application stage to integrate into development proposals, nor does it guarantee that solutions can be found on individual sites that can be considered safe in accordance with part 2 of the Exception Test.

8.11 The SFRA Level 2 document provides detailed information to address part two of the exceptions test and applicants should use this information to inform their flood risk assessment.

8.12 In summary, the Council considers the Sequential Test and the Exceptions Test to be passed for all the allocated sites in the Publication Version of the Merton Local Plan.

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | **Colliers Wood neighbourhood** | | | | | | | | | | | | | | | | | | |
| CW1 | Baltic Close | | x | | | Brownfield site (Hardstanding/Fenced off) | Residential and commercial mixed-use scheme | More Vulnerable /Less Vulnerable | | ✓ | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| CW2 | Brown & Root Phase 2, Car Park South of Britannia Point | x | x | x | | Vacant Brownfield site(Hardstanding) | Mixed use development; residential on upper floors with a mix of town centre uses on ground floor (financial and professional services, food and drink, office, assembly, health/day centre) | Less Vulnerable / More Vulnerable | ✓ | ✓ | ET | | | | 98% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout i.e. locating the development in the lower risk portion of the site, this site allocation can continue to be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | 98% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout i.e. locating the development in the lower risk portion of the site, this site allocation can continue to be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | Exception test Required | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | Development in area with established good transport links<br>All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br>It will enhance the appearance of the area.<br>Improvements will be made to the public realm.<br>It will make the area a more vibrant place to live.<br>Community facilities will be improved in the area.<br>The Level Two Strategic Flood Risk Assessment outlines the site-specific recommendations for managing, mitigating and reducing flood risk for development in this site allocation. Some of these recommendations are:<br>- A sequential approach should be applied within the site steering development towards those areas where the hazard rating is lower and at lower risk of surface water flooding.<br>- Finished floor levels for More and Less Vulnerable to be set 300mm above the 1% AEP flood level including 35% climate change.<br>- safe access and egress away from the site in the event of flooding from the River Wandle<br>- A Flood Warning and Evacuation Plan<br>*Planning permission submitted January 2021* |
| CW3 | Colliers Wood Community Centre | x | x | | | Community Centre | Mixed-use community Residential. | Less Vulnerable / More Vulnerable | ✓ | ✓ | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | submitted with any planning application). | |
| CW4 | Colliers Wood Station | x | x | | | Station and commercial premises. | Retail, Financial and professional, Restaurant or café, Community uses Residential on upper floors. | Less Vulnerable / More Vulnerable | ✓ | ✓ | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | |
| CW5 | Priory Retail Park | x | x | x | x | Retail sheds and surface car park. | Town centre uses on ground/lower floors (shops financial and professional services, food and drink, office, assembly, health/day centre or other sui generis use), Residential on upper floors and public space. | Less Vulnerable / More Vulnerable | ✓ | ✓ | ET | ET | | | While this site spans across all flood zones, 95% of it sits within the lower flood zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | While this site spans across all flood zones, 95% of it sits within the lower flood zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | Exception test Required | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | Development in area with established good transport links<br>All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br>It will enhance the appearance of the area.<br>Improvements will be made to the public realm.<br>It will make the area a more vibrant place to live.<br>Community facilities will be improved in the area.<br>There will be improvements to the local street and road network.<br><br>The Level Two Strategic Flood Risk Assessment outlines the site specific recommendations for managing, mitigating and reducing flood risk for development in this site allocation. For example, some of the site specific requirements are:<br>- 2% of the site is in FZ3b and 35 in FZ3a. There will be no development in these areas of the site. Development will be in FZ1 and FZ2 and these will be less and more vulnerable which is acceptable in these areas. In addition the following requirements will apply:<br>- Finished floor levels for More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including 35% allowance for climate change.<br>- Arrangements should be made for safe access and egress away from the site in the event of flooding from |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | | the River Wandle.<br>- A Flood Warning and Evacuation Plan. |
| | **Mitcham Neighbourhood:** | | | | | | | | | | | | | | | | | | |
| Mi1 | Benedict Wharf | x | | | | Waste facility | Residential, community uses | More Vulnerable<br>Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi2 | Birches Close | x | | | | Healthcare | Healthcare with community and enabling residential development | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | any planning application). | |
| Mi3 | Burn Bullock and Mitcham Cricket Pavilion | x | | | | Public house (currently closed) car park, Sports facility | Residential, Sports facility | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi4 | Elm Nursery Car Park | x | | | | Car Park | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi5 | Land at Canons | x | | | | Vacant | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi6 | 326 and 328 London Road | x | | | | Offices | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| Mi7 | 370 London Road | x | | | | Outdoor car wash | Residential Retail | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi8 | 1 to 12 Majestic Way | x | | | | residential, retail, office community and car park | Residential, retail, businesses, food and drink and community services | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi9 | Former Mitcham Fire Station | x | | | | Fire station | Residential, Healthcare Community Uses | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi10 | Mitcham Library | x | | | | Library | Library, Residential | Less Vulnerable More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi11 | Raleigh Gardens car Park | x | | | | Car Park | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | need to be submitted with any planning application). | |
| Mi12 | Sibthorpe Road Car Park | x | | | | Car Park | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi13 | 30 St Mark's Road | x | | | | Residential(long term vacant) | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi14 | United Westminster Schools site | x | | | | Playing field (Vacant) | Residential Sporting facilities | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi15 | Taylor Road Day Centre | x | | | | Day care centre | Residential, Healthcare, crèches | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| Mi16 | Mitcham Gasworks Western Road | x | | | | Vacant | Residential, Healthcare, crèches, day centre | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi17 | White Hart Pub and back land London Road | x | | | | Public house (currently closed) car park | Residential Restaurant /cafe or public house | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi18 | Wilson Hospital | x | | | | Health centre | Residential Healthcare | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mi19 | Worsfold House Church Road | x | | | | Offices | Residential Education | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| | **Morden neighbourhood** | | | | | | | | | | | | | | | | | | |
| Mo1 | Chaucer Centre | x | | | | Offices | Residential, Healthcare, crèches, day centre | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | Flood Risk Assessment will need to be submitted with any planning application). | |
| Mo2 | Farm Road Church | x | | | | Religious establishment (vacant) | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| Mo3 | Imperial Sports Ground Tooting and Mitcham Hub | x | x | x | | Sports Ground | Intensification of sporting activity on the wider Tooting and Mitcham Hub site may be supported by enabling development. Residential. | Water Compatible / Less Vulnerable / More Vulnerable | ✓ | ✓ | ET | | | | The majority of this site, 94%, is located in Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | The majority of this site, 94%, is located in Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | Exception test Required | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | All new housing will meet Decent Homes standards It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs. Open spaces will be incorporated into the development.<br><br>The Level Two Strategic Flood Risk Assessment outlines the site specific recommendations for managing, mitigating and reducing flood risk for development in this site allocation. Some of these recommendations are:<br>- A sequential approach should be applied within the site, steering development away from the northern edge of the site towards those areas in Flood Zone 1 and at lower risk of surface water flooding.<br>- An ordinary watercourse is located within the site boundary and the risk of flooding from this source should be further assessed as part of a site-specific flood risk assessment. Development should be set back from the edge of the Ordinary Watercourse. Consent will be required from Merton Council as the Lead Local Flood Authority for any works affecting flow in this watercourse.<br>- Finished floor levels for More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including 35% allowance for climate change.<br>*On 20 August 2020, Merton's Planning Applications Committee resolved to grant planning permission for the development of 77 homes on the site, subject to the completion of a S106 legal agreement and conditions. This application is considered to be of potential strategic importance and therefore, as part of Stage 2 of the referral process, the Mayor of London now has to make a decision to allow the Planning Applications Committee decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority*. |
| Mo4 | Morden Regeneration Zone | x | | | | Residential, retail, office, community and leisure, public realm and transport infrastructure | Residential, retail, office, community and leisure, public realm and | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | transport infrastructure | | | | | | | | | | | need to be submitted with any planning application). | |
| Mo5 | Morden Road Clinic and Morden Hall Medical Centre | x | | | | Health centre and pharmacy | Residential Healthcare | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mo6 | York Close Car | x | | | | Car Park | Residential Car Park | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Mo7 | Gifford House | x | | | | Offices | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| | Raynes Park neighbourhood | | | | | | | | ✓ | | | | | | | | | | |
| RP1 | Amity Grove Clinic | x | | | | Health Centre (relocated elsewhere) | Residential | More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | any planning application). | |
| RP2 | 245 -247 Burlington Road. | | x | x | | Former light industrial use ; now largely derelict | mix of retail, research and development and light industrial with residential on upper floors | Less Vulnerable / More Vulnerable | | ✓ | ET | | | | 98% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | 98% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | Exception test Required | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br>It will enhance the appearance of the area. Improvements will be made to the public realm.<br><br>The Level Two Strategic Flood Risk Assessment outlines the site-specific recommendations for managing and reducing flood risk for any development in RP2. The site-specific requirements are:<br>A sequential approach should be applied within the site, steering development towards those areas at lower risk of flooding<br>from all sources<br>Finished floor levels for More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including<br>35% allowance for climate change |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| RP3 | Tesco, Burlington Road | | x | x | x | Vacant office, call centre<br>and warehouse site. Retail<br>store car parking beneath<br>'air rights' opportunity. | Supermarket, residential, landscaping and access. | Less Vulnerable / More Vulnerable | | ✓ | ET | ET | | | Merton is a relatively small London borough with limited land supply available. The site will help contribute to creating safe attractive environments, provide new homes, jobs, social infrastructure and will help increase public access in the area. The additional residences will help satisfy the demand for housing within Merton. Improved transport capacity, a new permeable network of streets and urban spaces including amenity space. All alternate available sites are already included in the site allocations so there it is not possible to locate this is a lower flood risk zone | Merton is a relatively small London borough with limited land supply available. The site will help contribute to creating safe attractive environments, provide new homes, jobs, social infrastructure and will help increase public access in the area. The additional residences will help satisfy the demand for housing within Merton. Improved transport capacity, a new permeable network of streets and urban spaces including amenity space. All alternate available sites are already included in the site allocations so there it is not possible to locate this is a lower flood risk zone | Exception test Required | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br>It will enhance the appearance of the area. Improvements will be made to the public realm. Open spaces will be incorporated into the development. Open spaces will be incorporated into the development<br><br>The Level Two Strategic Flood Risk Assessment outlines the site-specific recommendations for managing, mitigating and reducing flood risk for development in this site allocation. Some of these recommendations are:<br>Development is not permitted in Flood Zone 3b Functional Floodplain.<br>· Development should be set back from the edge of the Pyl Brook by at least 8m.<br>· A sequential approach should be applied within the site, steering development towards those areas in Flood Zone 2 and at lower risk of surface water flooding. Development should be avoided in Flood Zone 3a.<br>· Finished floor levels for More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including 35% allowance for climate change<br>*Planning permission granted on appeal in 2021* |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| RP4 | 80-86 Bushey Road. | x | x | x | x | Part vacant, part retail, office and employment use (light industrial) | Residential-led mixed use development with office and/or community use and/or retail, professional services, food and drink | More Vulnerable / Less Vulnerable | ✓ | ✓ | ET | ET | | | 97% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | 97% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | Exception test required | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br>It will enhance the appearance of the area.<br><br>The Level Two Strategic Flood Risk Assessment outlines the site specific recommendations for managing, mitigating and reducing flood risk for development in this site allocation. Some of these recommendations are:<br>· A sequential approach should be applied within the site, steering development towards those areas in Flood Zone 1 and at lower risk of surface water flooding. Development should be avoided in the south west part of the site close to Flood Zone 3b Functional Floodplain.<br>· Finished floor levels for More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including an allowance of 35% for climate change.<br>· The site is located on the southern edge of the floodplain, and dry access/egress (i.e. above the modelled flood level for the 1% AEP event including 35% climate change allowance) should be achievable on the southern edge along the A289 or to the north along Bodnant Gardens and the B282.<br>· Any increase in building footprint along the south western part of the site will need ensure no loss in floodplain storage. |
| RP5 | All England Lawn Tennis Club Community Sports Ground 216 Grand Drive | x | x | | | Tennis Courts & Facilities | Tennis Courts & Facilities | Water compatible | ✓ | ✓ | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| RP6 | Land at the former LESSA Sports Ground Grand Drive | x | x | x | x | Sports Ground | Sporting use or Residential and Community Use | Water Compatible / Less Vulnerable / More Vulnerable | ✓ | ✓ | ET | ET | | | 89% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | 89% of this site is located within Flood Zones one and two (FZ1, FZ2). With a sequential approach to the site layout, this development can be located in this area. As such, there is no need to consider alternative sites in lower flood zones. | Exception test Required | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br><br>The Level Two Strategic Flood Risk Assessment outlines the site-specific recommendations for managing, mitigating and reducing flood risk for development in this site allocation. Some of these recommendations are:<br>There will be no development within FZ3b, 4% of the site.<br>A sequential approach should be applied within the site, locating development entirely within those areas in Flood Zone 1 and<br>at lower risk of surface water flooding.<br>Development is not permitted in areas of Flood Zone 3b Functional Floodplain in the south west part of the site,<br>No ground raising should take place.<br>Finished floor levels for More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including 35% allowance for climate change.<br>A Flood Warning and Evacuation Plan<br><br>*The site has an extensive planning history. It was part of a larger site that was granted planning permission on appeal in 2009 for the redevelopment of the site to provide:*<br>*- 44 homes (along what is now Meadowview Road).*<br>*- new tennis courts and clubhouse for the relocated Raynes Park Tennis Club – sports provision (on this site proposal) offered to Merton Council or Kings College School A series of planning applications were submitted in 2020 and 2021 for sports use on part of the site and residential on the remainder. Most recent application is 21/P4063* |
| RP7 | Rainbow Industrial Estate Grand Drive | x | | | | Industrial Estate | Residential Employment led regeneration | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | submitted with any planning application). | |
| RP8 | West Barnes Library | x | x | | | Library | Library with residential on upper floors. | Less Vulnerable / More Vulnerable | ✓ | ✓ | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| | **Wimbledon neighbourhood** | | | | | | | | | | | | | | | | | | |
| Wi1 | Battle Close, North Road | x | | | | Vacant | Residential Sport and leisure | More Vulnerable Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Wi2 | Broadway Car Park, | x | | | | Car Park | Retail, café and restaurants, community, cultural, leisure and entertainment, offices and hotel. | Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Wi3 | All England Lawn Tennis Club | x | | | | Tennis Courts & Facilities | Tennis Courts & Facilities | Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | any planning application). | |
| Wi5 | Hartfield Road Car Park | x | | | | Car Park | Retail, offices, assembly and leisure and hotel | Less Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Wi6 | Highlands House, 165- 171 The Broadway | x | | | | Retail, commercial and offices | Retail, financial, restaurants, drinking establishments, offices, community, sporting/leisure use, residential and hotel. | Less Vulnerable More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Wi7 | Rufus Business Centre | | x | x | | Commercial | Mixed-use Residential and Light Industrial. | Less Vulnerable / More Vulnerable | | ✓ | ET | | | | The site is predominantly in Flood Zone 1. This means the development can be located in this area. As such, there is no need to consider alternative sites in Flood Zone 1. | The site is predominantly in Flood Zone 1. This means the development can be located in this area. As such, there is no need to consider alternative sites in Flood Zone 1. | Exception test required | A site-specific Flood Risk Assessment and a Surface Water Flood Risk Assessment will need to be submitted with any planning application. *This site is subject to a live planning application which the council is determining now*. | All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br><br>The Level Two Strategic Flood Risk Assessment outlines the site-specific recommendations for managing, mitigating and reducing flood risk for development in this site allocation. Some of these recommendations are:<br>A sequential approach should be applied within the site, steering development towards those areas at lower risk of fluvial and<br>surface water flooding.<br>Finished floor levels for all More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including 35% allowance for climate change.<br>Arrangements should be made for safe access and egress away from the site in the event of flooding from the River Wandle |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | | *Planning application submitted* |
| Wi8 | South Wimbledon Station | x | x | | | Underground station and commercial premises. | Residential or residential mixed-use retail, financial services and professional, cafes and restaurants, public house and offices. | Less Vulnerable / More Vulnerable | ✓ | ✓ | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | |
| Wi9 | 28 St George's Road | x | | | | Vacant | Community use, retail, financial and professional services, offices, hotel and residential. | Less Vulnerable / More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Wi10 | Prospect House, 30 St George's Road | x | | | | Offices | Offices Hotels | Less Vulnerable / More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Wi11 | Victoria Crescent, 39-59 The Broadway | x | | | | Retail Leisure | Retail, hotel, financial assembly and leisure | Less Vulnerable / More Vulnerable | ✓ | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | | | | | | | | | | | | any planning application). | |
| Wi12 | Wimbledon Stadium and Volante Site | x | x | x | x | Vacant and largely under construction. | Intensification of sporting activity (D2 Use Class) with supporting enabling development. | Water compatible Less Vulnerable More Vulnerable | P | P | ET | ET | | | Merton is a relatively small London borough with limited land supply available. The site will help contribute to creating safe attractive environments, provide new homes, jobs, social infrastructure and will help increase public access in the area. The additional residences will help satisfy the demand for housing within Merton. Improved transport capacity, a new permeable network of streets and urban spaces including amenity space<br><br>This site is a key estate regeneration area. As such, locating the development elsewhere would not fulfil its regeneration objectives. The site cannot be located in a lower flood risk zone | Merton is a relatively small London borough with limited land supply available. The site will help contribute to creating safe attractive environments, provide new homes, jobs, social infrastructure and will help increase public access in the area. The additional residences will help satisfy the demand for housing within Merton. Improved transport capacity, a new permeable network of streets and urban spaces including amenity space<br><br>This site is a key estate regeneration area. As such, locating the development elsewhere would not fulfil its regeneration objectives. The site cannot be located in a lower flood risk zone | Exception Test required | Yes (Although a site specific Flood Risk Assessment and a Surface Water Flood Risk Assessment will need to be submitted with any planning application) *Planning permission has been granted and the development has been constructed (14/P4361)* | All new housing will meet Decent Homes standards<br>It will increase the supply of housing in the borough, thereby contributing to the 9,180 homes to be built in Merton by 2029 as set out in the London Plan 2021 and to the Local Plan's 15-year housing needs.<br>It will enhance the appearance of the area.<br>Improvements will be made to the public realm.<br>It will make the area a more vibrant place to live.<br><br>The Level Two Strategic Flood Risk Assessment outlines the site specific recommendations for managing, mitigating and reducing flood risk for development on this site allocation. Some of these recommendations are:<br>A sequential approach should be applied within the site where possible.<br>The proposed development must not reduce the ability of the floodplain to store water<br>Floodplain compensation storage must be provided on a level-for-level and volume-for-volume basis. Given the entire site is located within the 1% AEP including 35%<br>flood extent, it will not be possible to provide compensation storage within the site itself. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.<br>Finished floor levels for More and Less Vulnerable development should be set 300mm above the 1% AEP flood level including<br>35% allowance for climate change.<br>Arrangements should be made for safe access and egress away from the site in the event of flooding from the River Wandle |
| Wi13 | 8-20 Worple Road and 20-26 St George's Road | x | | | | Supermarket with ancillary car parking, and offices | Retail, financial, restaurants, drinking establishments, offices, community, sporting/leisure | Less Vulnerable / More Vulnerable | P | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with | N/A |

| Site Allocation ID | Site Name | Flood Zone | | | | Current Use | Proposed Development Use | Flood Risk Vulnerability Classification of Proposed Use | Proposed Use Compatible in Flood Zone… | | | | Could the Development be Allocated in a Lower Flood Risk Zone? | | | | Acceptability of Development in terms of Sequential test | Sequential Test Passed (Yes/No) | Exception Test (ET) Supporting Information |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 1 | 2 | 3a | 3b | | | | 1 | 2 | 3a | 3b | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| | | | | | | | use, residential and hotel. | | | | | | | | | | | any planning application). | |
| Wi15 | YMCA Wimbledon | x | | | | Hostel, gym, sports hall and café. | Retail, financial, restaurants, drinking establishments, offices, community, sporting/leisure use, residential and hotel. | Less Vulnerable / More Vulnerable | P | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |
| Wi16 | Centre Court Shopping Centre | x | | | | Retail, financial and professional services, offices | Retail, financial, restaurants, drinking establishments, offices, community, sporting/leisure use, residential and hotel. | Less Vulnerable / More Vulnerable | P | | | | | | | | Development is acceptable | Yes (although a Surface Water Drainage Strategy and Flood Risk Assessment will need to be submitted with any planning application). | N/A |