

Development Management Plan (Regulation 19)

Sequential Test for flood risk: Development site allocations –

- Town Centre Sites
- Urban Sites
- Sustainable Urban Extension Sites
- Strategic Employment Site

PLEASE NOTE: The EA have completed updated modelling this Autumn (2017) and this is informing updated site specific modelling for some areas. References to 2013/14 EA mapping will be updated on the receipt of these updated flood maps that are anticipated imminently, as will some of the maps.

October 2017

1. INTRODUCTION

- 1.1 This paper summarises the outcomes of Sequential Testing carried out in support of the Regulation 19 draft Development Management Plan (DMP).
- 1.2 This Sequential Test builds on the previous Sequential Tests undertaken to support the Core Strategy¹, which sequentially tested the proposed broad strategic locations for growth as set out in Policy CS6 and Policy CS13 of the Core Strategy.
- 1.3 A draft sequential test update was also prepared for the Regulation 18 DMP consultation (July 2016)². The Regulation 18 version made it clear that this sequential test would be finalised for the Regulation 19 consultation, when the preferred development site allocations had been identified. This report assesses the risk of flooding in relation to the following:
- Town Centre development sites
 - Other Urban sites
 - Sustainable Urban Extension (SUE) sites
 - Strategic employment site
- 1.4 This report takes account of the updated Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 which has been prepared since the Regulation 18 consultation and which includes up to date flood zone mapping. The SFRA 2017 Level 1 also provides details on the potential Flood Alleviation Schemes proposed for the Borough which may in the longer term reduce some of the flood areas.
- 1.5 Should planning applications be submitted for any of the development sites considered in this report, a detailed flood risk assessment with flood mitigation measures and the Exception Test will be expected to accompany the applications where necessary.
- 1.6 Redhill town centre is the borough's main town centre location for development and is significantly affected by fluvial and surface water flood risk. The Core Strategy itself does not make detailed site allocations, but opportunity sites for Redhill had been identified through the draft Redhill Town

¹ http://www.reigate-banstead.gov.uk/downloads/download/102/core_strategy_sequential_test

² http://www.reigate-banstead.gov.uk/downloads/file/2753/draft_sequential_test_for_flood_risk_potential_development_sites

Centre Area Action Plan (consultation draft 2011³). As part of the Core Strategy process, more detailed Sequential Testing⁴ was carried out to build on the evidence in the RTCAAP Flood Risk Assessment 2011 and provide greater confidence that the scale and type of development proposed in Redhill could be sustainably accommodated. A number of these sites are carried forward into the draft Regulation 19 DMP.

- 1.7 The Regulation 18 version of this report excluded Redhill Town centre given the opportunity sites for Redhill had already been sequentially tested as part of the work to inform the draft Redhill Town Centre Area Action Plan (consultation draft 2011). However, due to updated flood modelling in the 2017 SFRA these sites are now covered in this report as well.

2. POLICY CONTEXT

National Policy

- 2.1 The National Planning Policy Framework (para 100 - 101), seeks to direct development away from areas at risk of flooding and advises that development should not be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. For this reason, irrespective of the relative vulnerability of the use, the site selection process should reflect the preference for land at lower risk of flooding or sites where development could be accommodated without encroaching on land at higher risk of flooding.
- 2.2 As such, Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk by:
- Applying the Sequential Test;
 - If necessary, applying the Exception Test;
 - Safeguarding land from development that is required for current and future flood management;
 - Using opportunities offered by new development to reduce the causes and impacts of flooding; 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 facilitate the relocation of development, including housing, to more sustainable locations.

³ http://www.reigate-banstead.gov.uk/info/20088/planning_policy/37/redhill_town_centre_area_action_plan

⁴ http://www.reigate-banstead.gov.uk/downloads/file/207/sequential_test_addendum_-_redhill_town_centre

2.3 Table 1 shows flood risk vulnerability and Flood Zone ‘compatibility’ as identified in planning practice guidance⁵. See Appendix A for further information on what uses each classification covers.

| 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 | ✗ | Exception test required | ✓ | ✓ |
| Zone 3b | Exception test required | ✗ | ✗ | ✗ | ✓ |

- ✓ Development is appropriate
- ✗ Development should not be permitted

2.4 Planning Practice Guidance states that local planning authorities should, in applying a sequential approach to site selection, take account of climate change and the vulnerability of future uses to flood risk. The updated Strategic Flood Risk Assessment has modelled climate change impacts for all the identified sites and this has informed this sequential.

Local Policy

2.5 The Core Strategy sets out the broad scale and location of growth for the borough up to 2027. The hierarchy of development locations seeks to focus this growth in the urban area of the borough first, with a focus on the following areas:

- a. The priority locations for growth and regeneration:
 - Redhill town centre
 - Horley town centre
 - Horley North East and North West sectors
 - Preston regeneration area
 - Merstham regeneration area
 - Other regeneration areas as identified by the Council and its partners

- b. The built up areas of Redhill, Reigate, Horley and Banstead:

⁵ [Planning practice guidance](#) Paragraph: 066 Reference ID: 7-066-20140306 (Table 3)

c. Other sustainable sites in the existing urban area.

2.6 Core Strategy policies CS6 and CS13 identify the need to allocate sites beyond the urban area for sustainable urban extensions, and the Core Strategy identifies the broad areas where these should be located. These sites would be released for development in the event that the Council cannot demonstrate it has a five year supply of specific deliverable sites for housing.

2.7 In line with the objectives and findings from the Core Strategy, development sites in the following areas have been identified through work to prepare the Regulation 19 draft DMP document:

- Town Centre site allocations
- Urban site allocations
- Sustainable Urban Extension (SUE) site allocations
- Strategic employment site

2.8 With regard to the SUE sites, the Sequential Test has been undertaken for the complete list of SUE sites originally identified for testing. It has informed the shortlisting process and the identification of development sites for the purposes of consultation.

2.9 This Sequential Test document should be read alongside other supporting documents which provide the background on site selection, including for SUE sites; the SUE Technical report and the Green Belt review⁶.

3. BOROUGH CONTEXT

3.1 The below summarises the variation in flood risk across the borough:

- The risk of flooding within the north of the borough is relatively limited. There is no risk of flooding from rivers; however surface water flooding and flooding from other sources, such as blocked drainage systems, can be a problem in this area.
- Redhill town centre is an area at particular risk. Redhill Brook is culverted beneath the town. This culvert system is limited in its capacity, and is susceptible to blockage. During particularly wet weather, the culvert is surcharged, resulting in overland flooding and consequently ponding within the natural 'low spots' within the town centre. This flood risk environment places limitations on the scope for the town centre to meet future

⁶ http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/761/dmp_-_evidence

development needs and support regeneration whilst directing development away from areas that are susceptible to flooding.

- A number of localised flooding issues have been identified within Reigate. Reigate is situated at the foot of the North Downs and the permeability of soils in this area is highly variable. There is a risk of fluvial flooding to some properties south of Reigate Town Centre from the Wallace Brook and to the west of the Town Centre from the Saturday Ditch.
- River flooding is a recognised risk to property in the Horley area. Horley is situated at the confluence of the River Mole and Gatwick Stream, and a short distance downstream is the confluence of the River Mole and Burstow Stream. All three rivers flow through the town in open channel, and all pose a risk of flooding to homes and businesses during events of varying magnitude and return period.
- There is also a risk of river flooding in parts of Earlswood and Merstham.

4. METHODOLOGY

The Sequential Test

- 4.1 The aim of this Sequential Test is to steer new development to areas with the lowest probability of flooding, to establish which development sites are sequentially appropriate for development and if necessary to justify, though the Exception Test, why sites with a higher risk of flooding would be considered.
- 4.2 Any sites wholly within Flood Zone 1, or predominantly in Flood Zone 1 where development can be accommodated without requiring land in higher risk zones, should be considered for development first.
- 4.3 If there is a lack of suitable alternative sites in those areas at least/low risk from flooding (Flood Zone 1), then the Sequential Test allows the local planning authority to assess and if necessary identify land for development in those areas of moderate risk from flooding (Flood Zone 2). If - having assessed all sites in low and moderate flood risk areas - the local planning authority cannot identify sufficient land for its development needs, then it may still be able to identify land for development in areas at high risk from flooding (Flood Zone 3a). However, before the local planning authority can allocate this higher flood risk land a further test referred to as an Exception Test must be passed.
- 4.4 Within each site with more than one flood zone, new development should be directed first to areas at the lowest probability of flooding and the flood

vulnerability of the intended use matched to the flood risk of the site. For example, locating higher vulnerability uses on parts of the site at lowest probability of flooding.

Exception Test

4.5 To pass the Exception test, it must be demonstrated that the site's development would:

- Provide wider sustainability and regeneration benefits to the community that outweigh flood risk
- Be safe for its lifetime, not increase flood risk elsewhere and where possible reduce flood risk overall.

4.6 The Exception Test is covered in more detail in Section 6 below.

5. SEQUENTIAL TEST FINDINGS *(note that where sites are classified in the draft DMP as 'opportunity sites' these are included in this report as 'town centre sites' or 'urban sites' as appropriate)*

Town Centre development sites

3.1 Table 2 below provides a summary of the Sequential Test for the town centre development sites – the full Sequential Test can be found in Appendix B. This Sequential Test includes only the sites that are being taken forward for allocation in the Regulation 19 draft DMP and does not include the full list of sites that were considered originally.

3.2 As identified above, the development sites within Redhill Town Centre were previously covered under another sequential test and were not included within the earlier Regulation 18 sequential test assessment. However, updated flood modelling for these sites has been undertaken as part of the revised SFRA 2017, so for completeness these sites are now included in this report. The Environment Agency is exploring potential flood alleviation options to the benefit of Redhill town centre and upon completion the Redhill Town Centre sites may need further revision.

3.3 The table illustrates that 10 of 11 sites (A – D, F – K) are located wholly in Flood Zone 1 and so are sequentially preferable for development. For these sites, continuation with the Sequential Test is not necessary.

3.4 One site (Site E - Library and Pool House, Bancroft Road, Reigate) partly lies in Flood Zone 2 and 3. Residential use (which is a more vulnerable use) is proposed for this site, in addition to the less vulnerable retail and commercial uses. This is the only site identified in Reigate town centre to deliver retail floorspace to ensure that the town centre remains viable and competitive.

3.5 Options for developing this site should be explored thoroughly given the limited options for any development in the town centre. A scheme could be designed to provide the less vulnerable uses (parking) in the Flood Zone 3 areas, which would free up the delivery of a retail and residential/commercial scheme on Flood Zones 1 and 2. Should this not be possible, due to issues with feasibility or viability the Exception Test would need to be satisfied (see Section 6 for further information on the Exception Test)

Table 2: Sequential Test: summary of town centre site allocations

| Development Location | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | Proposed Uses | Vulnerability | Sequential Test Passed? |
|--|--------------|--------------|--------------|---|--|--|
| A. BAN1: 136-168 High Street, Banstead | Yes | No | No | Residential, retail/ community/ leisure | More Vulnerable & Less vulnerable | Yes |
| B. BAN2: The Horseshoe, Banstead | Yes | No | No | Residential, retail/ community/ leisure/public services | Highly Vulnerable More Vulnerable & Less vulnerable | Yes |
| C. RTC2: 16 – 46 Cromwell Road | Yes | No | No | Residential Retail/leisure/ commercial | More Vulnerable & Less vulnerable | Yes |
| D. RTC6: Gloucester Road Car Park | Yes | No | No | Residential Commercial | More Vulnerable & Less vulnerable | Yes |
| E. REI1: Library and Pool House, Reigate | Yes | Yes, partly | Yes, partly | Residential Retail/ commercial/ leisure/ community | More Vulnerable & Less vulnerable | Yes, development can be directed to areas of lowest risk Should development be needed in higher risk areas, then Exception Test would be required |
| F. REI2: Town hall site, Reigate | Yes | No | No | Residential Commercial | More Vulnerable & Less vulnerable | Yes |
| G. HOR1: High Street | Yes | No | No | Residential Retail/leisure | More Vulnerable & | Yes |

| | | | | | | |
|--|-----|----|----|----------------------------|-----------------------------------|-----|
| Car Park, Horley | | | | | Less vulnerable | |
| H. HOR3: Horley Police Station, Horley | Yes | No | No | Residential | More Vulnerable | Yes |
| I. HOR5: Library site, Victoria Road, Horley | Yes | No | No | Residential Community | More Vulnerable & Less vulnerable | Yes |
| J. HOR6: 50-66 Victoria Road, Horley | Yes | No | No | Residential Retail/leisure | More Vulnerable & Less vulnerable | Yes |
| K. HOR7: Telephone Exchange site, Horley | Yes | No | No | Residential Community | More Vulnerable & Less vulnerable | Yes |

Other Urban sites

- 3.6 Table 3 below provides a summary of the Sequential Test for the urban site allocations identified in the Regulation 19 draft DMP document – the full Sequential Test can be found in Appendix C. The table illustrates that nine of twelve sites identified (sites A, C - F, H, J - L) are located wholly in Flood Zone 1 and so are sequentially preferable for development. For these sites, continuation with the Sequential Test is not necessary.
- 3.7 Parts of sites B, G and I are situated within Flood Zones 2 and 3. For site G development could be directed to parts of the site that sit in Flood Zone 1.
- 3.8 For sites B and I, given the need to maximise development on these sites from the perspective of both regeneration and viability, it is unlikely to be feasible for parts of the site at risk of flooding to be avoided due to the impact it would have on development capacity. Therefore, both sites will require the Exception Test to be satisfied to justify consideration of the entire site for the optimal level of development – see section 6 for further information.

Table 3: Sequential Test summary of urban sites

| Development Location | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | Proposed Uses | Vulnerability | Development sequentially compatible? |
|----------------------|--------------|--------------|--------------|---------------|---------------|--------------------------------------|
|----------------------|--------------|--------------|--------------|---------------|---------------|--------------------------------------|

| | | | | | | |
|---|-----|----------------|----------------|---------------------------------|--|---|
| A. BAN3: Banstead Community Centre | Yes | No | No | Residential Community use | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| B. RTC4: Colebrook | Yes | Yes, partly | Yes, partly | Residential Community use | More Vulnerable | No – Exception Test required |
| C. RTC5: Former Longmead centre | Yes | No | No | Residential | More Vulnerable | Yes |
| D. RED1: Quarryside Business Park | Yes | No | No | Residential Community use | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| E. RED2: Bellway House | Yes | Yes | Yes | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| F. RED4: Church of Epiphany | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| G. RED5: Merstham Library | Yes | Yes, partly | Yes, partly | Residential Community | More Vulnerable | Yes, development can be directed to areas of low risk |
| H. RED6: Former Oakley Centre | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| I. RED8: Land at Reading Arch Road/Brighto n Road | Yes | Yes, partly | Yes, partly | Residential Retail | More Vulnerable Less Vulnerable | No – Exception Test required |
| J. REI3: Albert Road North Industrial Estate | Yes | No | No | Residential Employment | More Vulnerable Less Vulnerable | Yes – site wholly in Flood Zone 1 |
| K. HOR8: Former Chequers Hotel | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| L. HOR8a: 59 – 61 Brighton Road | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |

Sustainable Urban Extensions sites

- 3.9 Table 4 below provides a summary of the Sequential Test for the full range of sustainable urban extension sites tested and the strategic employment site - the full Sequential Test can be found in Appendix D. This table illustrates that twelve of thirty-three sites (Sites 1 - 9, 13 – 14 and 23) are located wholly in Flood Zone 1 and a further two sites (Sites 15 and 16) are predominantly in Flood Zone 1 with a very small amount of land on the periphery of these site being in Flood Zones 2 and 3. All of these sites are therefore sequentially preferable for development. For these sites there would be no need to proceed further with the Sequential Test.
- 3.10 There are also thirteen sites (Site 10 – 12, 17 – 19, 22, 24 – 26, 28, 31, 32) where it appears that development could realistically be restricted to those parts of the site at lowest risk (Flood Zone 1) in which case there would be no need to proceed further with the Sequential test (subject to design restricting development to Flood Zone 1).
- 3.11 The remaining six sites (Site 20 – 21, 27, 29 – 30, 33) have no areas of Flood Zone 1 or areas of Flood Zone 1 that are too small to accommodate development. In combination with other parts of the DMP evidence base it has been concluded that these sites are not appropriate or required for allocation.

Strategic Employment Site

- 3.12 The two land parcels (Sites 22 and 23) identified as part of the strategic employment development site have areas that fall within in Flood Zone 2. However, the land parcels (when taken together) are predominantly in Flood Zone 1 and it is considered that development could be constrained to just Flood Zone 1, as areas of lowest risk, which would require no further testing. Alternatively, should it be demonstrated that additional land is required and development on the whole site is sought then the proposed office use (categorised as Less Vulnerable) would be appropriate on the site subject to appropriate mitigation.

Table 4: Sequential Test summary of sites for development outside existing urban areas (note that sites marked # are not proposed for allocation in the draft DMP)

| | Development Location | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | Proposed Uses | Vulnerability | Development sequentially compatible? |
|-----------|-------------------------------|---------------------|---------------------|---------------------|----------------------|----------------------|--|
| 1 | East Redhill – ERM1 | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 2 | East Redhill – ERM2 | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 3 | East Redhill – ERM3 | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 4 | East Merstham – ERM4 (and 4a) | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 5 | East Merstham – ERM5 | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 6 | East Merstham – ERM6 # | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 7 | South Reigate – SSW1 # | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 8 | South Reigate – SSW2 | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 9 | South Reigate – SSW3 # | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |
| 10 | South Reigate - SSW4 # | Yes | Yes, minor | Yes, partly | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 11 | South Reigate – SSW5 # | Yes | Yes, minor | Yes, partly | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 12 | South Reigate – SSW6 | Yes | Yes, minor | Yes, substantially | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 13 | South Reigate – SSW7 | Yes | No | No | Residential | More Vulnerable | Yes – site wholly in Flood Zone 1 |

| | | | | | | | |
|----|--|-----|--------------------|-------------|-------------|-----------------|---|
| 14 | South Reigate – SSW8 # | Yes | No | No | Residential | More Vulnerable | Yes - site wholly in Flood Zone 1 |
| 15 | South Reigate – SSW9 | Yes | Yes, minor | Yes, minor | Residential | More Vulnerable | Yes, sites predominantly in FZ1. Development can be accommodated on FZ1 without requiring land in FZ 2 & 3. |
| 16 | South Reigate – SW10 # | Yes | Yes, minor | Yes, minor | Residential | More Vulnerable | Yes, sites predominantly in FZ1. Development can be accommodated on FZ1 without requiring land in FZ 2 & 3. |
| 17 | North Horley – NWH1 | Yes | Yes, minor | Yes, partly | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 18 | North Horley – NWH2 | Yes | Yes, substantially | Yes, minor | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 19 | East Horley – EH1 # | Yes | Yes, partly | Yes, minor | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 20 | East Horley – EH2 # | No | Yes, substantially | Yes, partly | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| 21 | East Horley – EH3 # | No | Yes, substantially | Yes, partly | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| 22 | South East Horley – SEH1 (strategic Employment Site) | Yes | Yes, partly | No | Office | Less Vulnerable | Yes – development can be directed to FZ1 only. |
| 23 | South East Horley – SEH2 (strategic Employment Site) | Yes | No | No | Office | Less Vulnerable | Yes - site wholly in Flood Zone 1 |
| 24 | South East Horley – SEH3 # | Yes | Yes, partly | Yes, minor | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |

| | | | | | | | |
|-----------|-----------------------------|-----|--------------------|-------------|-------------|-----------------|---|
| 25 | South East Horley – SEH4 | Yes | Yes, partly | Yes, partly | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 26 | South East Horley – SEH5 # | Yes | Yes, partly | Yes, minor | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 27 | South East Horley – SEH6 # | No | Yes, substantially | Yes, minor | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| 28 | South East Horley – SEH7 # | Yes | Yes, partly | Yes, partly | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 29 | South East Horley – SEH8 # | Yes | Yes, substantially | Yes, partly | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| 30 | South East Horley – SEH9 # | Yes | Yes, substantially | Yes, partly | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| 31 | South East Horley – SEH10 # | Yes | Yes, substantially | Yes, minor | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 32 | South East Horley – SEH11 # | Yes | Yes, substantially | Yes, partly | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| 33 | South East Horley – SEH12 # | Yes | Yes, substantially | Yes, partly | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |

6. EXCEPTION TEST

- 6.1 The NPPF states that if following the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied in certain circumstances.
- 6.2 The sequential test has identified that there are 3 sites proposed for allocation where the Exception Test would apply if a particular level of development is pursued. These sites, and the allocated uses, are as follows:
- REI3: Library and Pool House, Reigate - Retail/commercial/leisure/community and residential
 - RTC4: Colebrook, Redhill – Residential and Community (community uses may include some “Non–residential uses for health services, nurseries and educational establishments” which comes under the *more vulnerable* classification)
 - RED8: Land at Reading Arch Road, Redhill – Bulky goods Retail and Residential
- 6.3 For the Exception Test to be passed, two criteria must be satisfied:
- a. it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and
 - b. a site-specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 6.4 It is considered that all three of the sites identified above meet the first part of the Exception Test due to the reasons set out below:
- 6.5 The regeneration of Redhill town centre is a Council priority as set out in the Corporate Plan. The Core Strategy identifies Redhill town centre as a key Regeneration Area and the main centre for growth in the borough recognising its comparative locational/connectivity advantages and regional designations but also the need for the town centre to grow in order for it to fulfil its potential. For Reigate, the Core Strategy states that it will be important to ensure that Town Centre remains attractive and viable, offering a good range of shops and services.
- 6.6 The pool of opportunity sites in Reigate and Redhill town centre is limited due to the physically constrained town centre. The identified sites in the DMP are

the only suitable sites (in terms of size, constraints, viability etc) either within the town centres or on the edge of the town centres, and as such play a specific role in achieving the spatial strategy for the town centres and, in the case of Redhill Town Centre, delivery of the regeneration objectives and benefits. As a result, there are no other reasonably available alternatives to those sites identified.

- 6.7 The identification of sites for retail provision is based on proximity to the primary shopping area and its contribution to and consolidation of the existing offer. Locations in close proximity to the primary shopping centre are therefore the primary consideration, consistent with national policy.
- 6.8 The implication of this is that it is therefore necessary for all of those sites identified to be taken forward for some form of development in order to deliver the amount of growth needed to support and sustain the town centres.
- 6.9 Given the specific roles for Reigate and Redhill a number of less and more vulnerable uses are important to the future growth and viability of the town centre. The specific need to locate these in Reigate and Redhill town centre and consequently the rationale as to why no other locations can be considered reasonable alternatives, is discussed below:

Retail and leisure

- 6.10 The Core Strategy notes that Redhill does not currently fulfil its potential in terms of its retail offer and range of leisure facilities. This results in the borough's residents, and potential employers, choosing to - or having to - travel or locate elsewhere. Given its strong locational advantages, Redhill is identified in the Core Strategy as the main centre for consolidation and growth.
- 6.11 The Core Strategy also states that Reigate must remain attractive and viable, offering a good range of shops and services.
- 6.12 To inform the DMP, an updated Retail and Leisure Need Assessment (RLNA) 2016 was undertaken which provided figures on retail need in the different town centre. This identified the following:
- The Retail and Leisure Needs Assessment (RLNA) 2016 identifies the need for around 12,900 sqm of additional comparison retail floorspace to be developed in the borough by 2027 in order to maintain current market share.
 - The RLNA identifies that Reigate has the highest comparison sector need in the borough and the report noted that 5,100 sqm of comparison was needed by 2027 in Reigate. However, the report

acknowledged that this could not all be accommodated in Reigate so this figure was adjusted to around 2,550sqm of additional comparison floorspace in Reigate, with the rest being accommodated in Redhill. This gives Redhill a recommended need for 7,500 sqm of comparison floor space by 2027.

- The RLNA also identified a need for 400sqm of additional convenience sector floorspace by 2027 in Reigate.
- Front loading of comparison retail provision in Redhill is proposed in order to capture the benefits from inward investment and ensure that it is more resilient to competition.
- Banstead and Horley do not have the capacity to absorb any additional retail over and above what is required anyway for natural growth, or could viably or sustainably accommodate retail development on such a scale.

6.13 It is therefore necessary to:

- try to accommodate the above identified retail need in Reigate Town Centre as far as possible without conflicting with other planning considerations such as character in order to support the function of Reigate.
- direct the identified level of retail growth to Redhill. Failure to do so would compromise regeneration of the town centre and would weaken its long-term competitiveness and viability as a retail destination.

6.14 RED8: Land at Reading Arch Road - the RLNA states "*In terms of the comparison sector, there are gaps in the provision of the main bulky goods sub-categories (furniture, carpets, DIY, electrical goods, sports and toys). However there is no scope to meet retailer requirements for large units within the centre and out of centre floorspace is limited within the borough as a whole.*" As discussed above, there are limited options for sites within Redhill Town Centre, and no sites which would be suitable in particular for the bulky retail use which is proposed on RED8. As such, this site is important to fulfil this need whilst still being accessible and well related to the Town Centre.

6.15 REI3: Library and Pool House – this site is the only site within the town centre boundary and in close proximity to the primary shopping area which provides the opportunity for additional retail space to support the vitality and viability of Reigate Town Centre.

Residential

6.16 The Council's Core Strategy sets a requirement for at least 6,900 additional homes to be delivered across the borough between 2012 and 2027, requiring

at least 280 homes within the urban area of Reigate and 1,330 homes within the Redhill area (with around 750 of this total in Redhill Town Centre.)

- 6.17 Given its accessibility and character, Redhill is the most suitable location for achieving relatively large scale housing growth with a relatively low land take by developing efficiently at higher densities. Coupled with the identified demand for smaller units in the borough, development in Redhill, particularly in and around the Town Centre, is likely to make an important contribution to housing supply.
- 6.18 In addition to the positive contribution which the town centre can make to overall housing supply, residential development in and around Reigate and Redhill town centres also represents an important part of mixed-use development, having the potential to introduce greater critical mass and vibrancy into Redhill and Reigate, which is consistent with the NPPF. Given its high value, the inclusion of residential uses is also likely to be essential to generate the economic viability required for site - particularly on some of the more complex sites - to come forward.
- 6.19 For these reasons, it is necessary - with regards to wider sustainability and to support the regeneration of the town centre - to direct residential growth to these town centres, and particularly Redhill. Whilst the two sites in Redhill (RED8 and RTC4) are not within the town centre boundary, they are directly adjacent and so would still complement and be supported by Redhill Town Centre.

Offices

- 6.20 The Economic Development Needs assessment 2016 (EDNA) recommends to meet local economic needs over the plan period and to support forecast economic growth that, as a minimum, the following additional floorspace should be provided:
- 6,500 sqm of additional industrial space
 - 11,000 sqm of additional storage and distribution space
 - 25,500 sqm of office space
- 6.21 The EDNA also identified a number of overall objectives for the borough's economy and specific sub-markets within it, including maintaining Reigate's position as a location for corporate HQs. The Core Strategy states that Reigate is a strategically important employment location in the borough particularly for office uses and there is some scope within Reigate town centre for intensification of office uses, subject to the constraints of the conservation area designation.

6.22 Out of the three sites identified above, office use is only applicable to REI1: Library and Pool House. Whilst there is some office use proposed on the Town Hall site in Reigate (DMP site allocation REI2), this is only 1,500sqm which would not accommodate the full amount of office space identified for the Reigate area in the Core Strategy, which sets out a requirement for approximately 13,000sqm across Area 2a and Area 2b (excluding Redhill town centre).

Exceptions Test summary

- 6.23 Retail, residential, commercial and community development in town centres also supports other sustainability objectives. Users would benefit from the higher levels of public transport accessibility that town centres support and access to a range of services and facilities, reducing the need for private travel.
- 6.24 Both retail and office use is sequentially preferable in town centre locations and as less vulnerable uses may be useful to consider given less vulnerable uses are appropriate in Flood zone 3a.
- 6.25 The discussion above demonstrates that it would not be possible to focus the growth proposed for Redhill and Reigate town centre on land in lower flood risk areas elsewhere in or beyond the urban area and still achieve and deliver the same objectives and regeneration benefits.
- 6.26 Therefore, whilst the flood risk constraints in the town centre are notable, there are no other reasonable or realistic alternative strategic locations in areas of lower flood risk for the type of development planned for Redhill or Reigate town centre. For this reason, directing growth to Redhill town centre is concluded to be sequentially appropriate.
- 6.27 The second part of the test requires that the development is safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall. The Strategic Flood Risk Assessment (SFRA) comprises a Level 1 and 2 assessment and provides some principles as to mitigation and alleviation measures that could be applied at development sites at risk of flooding.
- 6.28 Further compliance with this part of the test will need to be demonstrated by developers by reference to site specific flood risk assessments and the Development Management Plan includes a policy requirement to this effect. The Strategic Flood Risk Assessment 2017 Level 2 provides initial

assessment of these sites to inform the preparation of more detailed site specific flood risk assessments to accompany planning applications.

7. Conclusions

7.1 The results presented in Section 5 show that the Sequential Test has been met for the majority of development allocations proposed in the draft Development Management Plan.

7.2 The development allocations in the north of the borough are located entirely within Zone 1 and there are therefore no flood restrictions on development within these areas.

7.3 Where development locations include land within Zone 2 and 3, consideration has been given to whether development could be redirected to areas in Zone 1 in the first instance. Where this was considered not possible, Zone 2 has been considered next; in such circumstances residential development and other more vulnerable uses such as community facilities are acceptable in Zone 2 subject to demonstration that development would be safe for the users.

7.4 Only three sites would likely need to include some element of Flood Zone 3 and include more vulnerable uses. As the Sequential Test has not been met for these sites, it will be necessary for them to meet the requirements of the Exception Test.

7.5 It is considered that these development sites meet the first part of Exception Test as the development of these sites would provide wider sustainability benefits to the community that outweigh the flood risk. The second part of the test requires that the development is safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall. Compliance with this part of the test will need to be demonstrated by developers by reference to site specific flood risk assessments and the Core Strategy and DMP (Policy CCF2) include a policy requirement to this effect.

7.6 The assessment of flood risk outlined in this report supports delivery of the proposed level of growth set out in the Core Strategy and further clarified through the draft DMP. It takes account of the need to deliver this in a sustainable manner and the requirements of the NPPF have therefore been met.

8. APPENDICES

Appendix A:

Flood risk vulnerability classification

As set out in Paragraph: 066 Reference ID: 7-066-20140306 of planning practice guidance, uses are categorized as follows:

Essential infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.
- Wind turbines.

Highly vulnerable

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure').

More vulnerable

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill* and sites used for waste management facilities for hazardous waste.

- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

Less vulnerable

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.

Water-compatible development

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

* * “ Landfill is as defined in [Schedule 10 of the Environmental Permitting \(England and Wales\) Regulations 2010](#).

Appendix B:

Town Centre development sites

A.1 - Summary table

| Site Ref. | Site Name | Location | Flood Zone (%) | | | | Proposed Uses | Vulnerability | Sequential Test Passed? |
|-----------|--|----------|----------------|-----|-----|----|--|---|--|
| | | | FZ1 | FZ2 | FZ3 | | | | |
| | | | | | 3a | 3b | | | |
| A. | BAN1 - 136-168 High Street (Opportunity Site) | Banstead | 100 | 0 | 0 | 0 | Residential, retail/community/leisure | More Vulnerable & Less vulnerable | Yes |
| B. | BAN2 - The Horseshoe | Banstead | 100 | 0 | 0 | 0 | Residential, retail/community/leisure/ public services | Highly Vulnerable More Vulnerable & Less vulnerable | Yes |
| C. | RTC2 - 16 – 46 Cromwell Road | Redhill | 100 | 0 | 0 | 0 | Residential Retail/leisure/commercial | More Vulnerable & Less vulnerable | Yes |
| D. | RTC6 – Gloucester Road Car Park | Redhill | 100 | 0 | 0 | 0 | Residential Commercial | More Vulnerable & Less vulnerable | Yes |
| E. | REI1 - Library and Pool House (Opportunity Site) | Reigate | 65 | 35 | 14 | 14 | Residential Retail/commercial/ leisure/community | More Vulnerable & Less vulnerable | Yes, development can be directed to areas of lowest risk |
| F. | REI2 - Town hall site | Reigate | 100 | 0 | 0 | 0 | Residential Commercial | More Vulnerable & Less vulnerable | Yes |
| G. | HOR1: High Street Car Park | Horley | 100 | 0 | 0 | 0 | Residential Retail/leisure | More Vulnerable & Less vulnerable | Yes |
| H. | HOR3: Horley | Horley | 100 | 0 | 0 | 0 | Residential | More Vulnerable | Yes |

| | | | | | | | | | |
|----|--|--------|-----|---|---|---|----------------------------|-----------------------------------|-----|
| | Police Station | | | | | | | | |
| I. | HOR5: Library site, Kings Road | Horley | 100 | 0 | 0 | 0 | Residential Community | More Vulnerable & Less vulnerable | Yes |
| J. | HOR6: 50-66 Victoria Road (Opportunity Site) | Horley | 100 | 0 | 0 | 0 | Residential Retail/leisure | More Vulnerable & Less vulnerable | Yes |
| K. | HOR7: Telephone Exchange site (Opportunity Site) | Horley | 100 | 0 | 0 | 0 | Residential Community | More Vulnerable & Less vulnerable | Yes |

Note: Bear in mind that FZ3a and b sits within FZ2 when looking at the numbers above

Green – Completely FZ1 (or nominal FZ2/3) and in flood risk terms sequentially preferable for development

Amber – Mix of FZ1/FZ2 and FZ3, development potential to be explored.

Annex A.2 - Sequential Test Questionnaire

| 1. Are the proposed sites in 'Flood Zone 1 – Low Probability' of flood risk? | |
|--|---|
| Yes | <p>Sites wholly in Flood Zone 1:</p> <ul style="list-style-type: none"> • 136-168 High Street, Banstead • The Horseshoe, Banstead • 16 – 46 Cromwell Road, Redhill • Gloucester Road Car Park, Redhill • Town Hall site, Castlefield Road, Reigate • High Street Car Park, Horley • Horley Police Station, Massetts Road, Horley • Library site, Kings Road, Horley • 50-66 Victoria Road, Horley • Telephone Exchange site, Horley <p>Sites predominantly in Flood Zone 1 where development can be accommodated without encroachment into Zones 2 and/or 3 include:</p> <p>N/A</p> <p><i>For these sites wholly (or predominantly) in Flood Zone 1 where development can be accommodated without requiring land in higher risk zones, all development types are appropriate and there is no need to proceed further with the Sequential Test.</i></p> |
| No | <p>Sites partly, substantially or wholly in Zones 2 and 3:</p> <p><u>Library and Pool House, Bancroft Road, Reigate:</u> The northern part of the site sits in FZ2, with an area of FZ3 at the southern part of the site. Together FZ2 and FZ3a and b equate to a little less than half of the site.</p> <p><i>For sites partly, substantially or wholly within Flood Zone 2 and 3, proceed to question 2.</i></p> |

| 2. Could the proposed sites in Flood Zones 2 and 3 alternatively be located in or directed to areas in 'Flood Zone 1 Low Probability' of flood risk: | |
|--|---|
| Yes | N/A |
| No | <p>a) Explain why the proposals cannot be redirected to Zone 1:</p> <p><u>Library and Pool House, Bancroft Road, Reigate:</u> The Borough's Core Strategy sets out the retail floorspace requirements for the Borough and the Retail Needs Assessment 2016 provides an up to date assessment of retail needs for each of the town centres up to 2027, which is reflected in the DMP. Each of the town centres is unique in character and role. Reigate town centre is one of</p> |

the healthiest town centres and the Retail Need Assessment 2016 recommends that around 3,950 – 4,100 sqm of additional comparison floorspace and 600sqm of additional convenience sector floorspace is planned for by 2032 in Reigate. Reigate town centre is set within a conservation area and is further constrained by topography, the road network, surrounding residential area and Priory Park. Growth of this town centre is physically constrained and has limited site availability immediately fronting onto the high street or in close proximity to the primary shopping area. Looking further afield, site availability is minimal, and sites further afield are not sequentially preferable in retail terms, i.e. would be likely to draw trade and people away from the town centre.

The development of this site would support Reigate town centre to remain a competitive and viable centre serving the needs of the local population. This site is located within the town centre boundary and in close proximity to the primary shopping area so would play a complementary role to the high street. Connectivity to the high street is good and can be further improved upon. Should retail be delivered on this site this could result in Bancroft Road forming part of the retail frontage. Sites beyond the town centre boundary will not be able to play such a key role due to distance from the primary shopping area, and are also limited.

b) Identify alternative sites that were considered and explain why they were dismissed

REI2 Town Hall site was also considered for retail but due to site context, particularly distance from the main shopping area, was not considered appropriate for retail purposes. There are no alternative sites currently available within the Reigate Town Centre boundary to deliver the required retail growth anticipated. It is unlikely that identified growth for Reigate can be accommodated on this site alone.

If the site is in ‘Flood Zone 2 Medium Probability’ proceed to Question 3.

If the site is in ‘Flood Zone 3a High Probability’ proceed to Question 4.

If the site is in ‘Flood Zone 3b High Probability’ proceed to Question 5.

NOTE: If the site is located in more than one Flood Zone, it will be necessary to answer Questions 3, 4 and 5 as necessary for each part of the site in a different Flood Zone.

3. For sites in ‘Zone 2 Medium Probability’ of flood risk.

a. Proposed uses for the entire site:

Library and Pool House, Bancroft Road, Reigate: Mixed use including retail, leisure, residential and community uses. Likely to include retail (shops) on ground floor with either commercial (offices) or residential on upper floors.

b. Are the proposed uses in the ‘Water Compatible’, ‘Less Vulnerable’, ‘More Vulnerable’, or ‘Essential Infrastructure’ Flood Risk Vulnerability Classifications set out in Para.066 of the Planning Practice Guidance?

Yes List the proposed uses in these classifications:

Library and Pool House, Bancroft Road, Reigate:
More Vulnerable: Residential and community uses (specific uses are not known at this moment but it is recognised that with regard to community use, non-residential uses for health services, nurseries and educational establishments are included in the more vulnerable category which would need to be addressed as appropriate within any planning application)

Less Vulnerable: Retail (shops), commercial (offices) and leisure

These proposals are appropriate if located in Flood Zone 2 and there is no need to proceed with the Exception Test for the parts of the site in Flood Zone 2. Proceed to Question 4 for the parts of the site in Flood Zone 3.

No List the proposed uses not in these classifications:

N/A: There are no ‘highly vulnerable’ uses planned on any of the identified sites.

c. Can the more flood sensitive development types (‘highly vulnerable’) be directed to parts of the site where the risks are lower for both the occupiers and the premises themselves?

Yes Identify how the risks have been reduced:

N/A: no highly vulnerable uses proposed

No Explain why the development types cannot be relocated:

N/A: no highly vulnerable uses proposed

4. For sites in ‘Zone 3a High Probability and Zone 3b Functional Flood Plain’ of flood risk.

a. Proposed uses for the entire site:

Library and Pool House, Bancroft Road, Reigate: Mixed use including retail, leisure, residential and community uses. Likely to include retail (shops) on ground floor with either commercial (offices) or residential on upper floors.

b. Could the proposed development on sites in Flood Zone 3 alternatively be located on sites in Flood Zone 1 Low Probability’ or ‘Flood Zone 2 Medium

| Probability' of flood risk: | |
|--|--|
| Yes | N/A |
| No | <p>Explain why the development types cannot be relocated</p> <p>There is limited site availability in Reigate town centre; there is identified need for additional floorspace in Reigate town centre for a variety of uses (particularly retail) but this is the only site within the town centre identified as having potential. The full potential of this site needs to be explored to deliver as much retail floorspace provision as possible to address identified need subject to viability and design issues.</p> |
| c. Are the proposed uses in the 'Water Compatible' or 'Less Vulnerable' Flood Risk Vulnerability Classifications set out in Table 2 of NPPF Technical Guidance | |
| Yes | <p>List the proposed uses in these classifications:</p> <p><i>Less Vulnerable:</i> Retail (shops), commercial (offices) and leisure</p> |
| No | <p>List the proposed uses not in these classifications:</p> <p><u>Library and Pool House, Bancroft Road, Reigate:</u> <i>More Vulnerable:</i> Residential, and potentially community uses</p> <p>Specific uses for this site are not known at this moment, but proposed potential uses include community uses. It is recognised that with regard to community use, non-residential uses for health services, nurseries and educational establishments are included in the more vulnerable category which would need to be addressed as appropriate within any planning application.</p> <p><i>For these proposed uses proceed to Question 4d and 4e</i></p> |
| d. Can the 'more vulnerable' or 'essential infrastructure' development types be directed to parts of the site where the Flood Zone is compatible with their vulnerability and risks to both occupiers and premises are reduced? | |
| Yes | <p>Identify how the risks could be reduced:</p> <p>Depending on the configuration of the proposal, development could be focussed on the area of the site that sits in FZ1 and FZ2 and the area in FZ3 can be allocated for a less vulnerable use (i.e. parking). If this approach is taken, there is no need to proceed with the Exception Test.</p> <p><i>It will be necessary to prepare a site specific Flood Risk Assessment for this development to demonstrate that an adequate standard of safety can be achieved and the development will comply with sequential and exception test if applicable (depending on proposal). Consideration</i></p> |

| | |
|--|--|
| | <i>should be made early in the planning process with respect to flood risks, mitigation and egress/access considerations and will be guided by planning policies and site specific guidance.</i> |
| No | Explain why the development types cannot be relocated: There is limited site availability in Reigate town centre; there is identified need for additional floorspace in Reigate town centre for a variety of uses (particularly retail) but this is the only site within the town centre identified as having potential. . |
| e. Can the ‘highly vulnerable’ development types be directed to parts of the site where the Flood Zone is compatible with their vulnerability and risks to both occupiers and premises are reduced? | |
| Yes | Identify how the risks could be reduced: N/A: no highly vulnerable development types proposed |
| No | N/A: no highly vulnerable development types proposed |

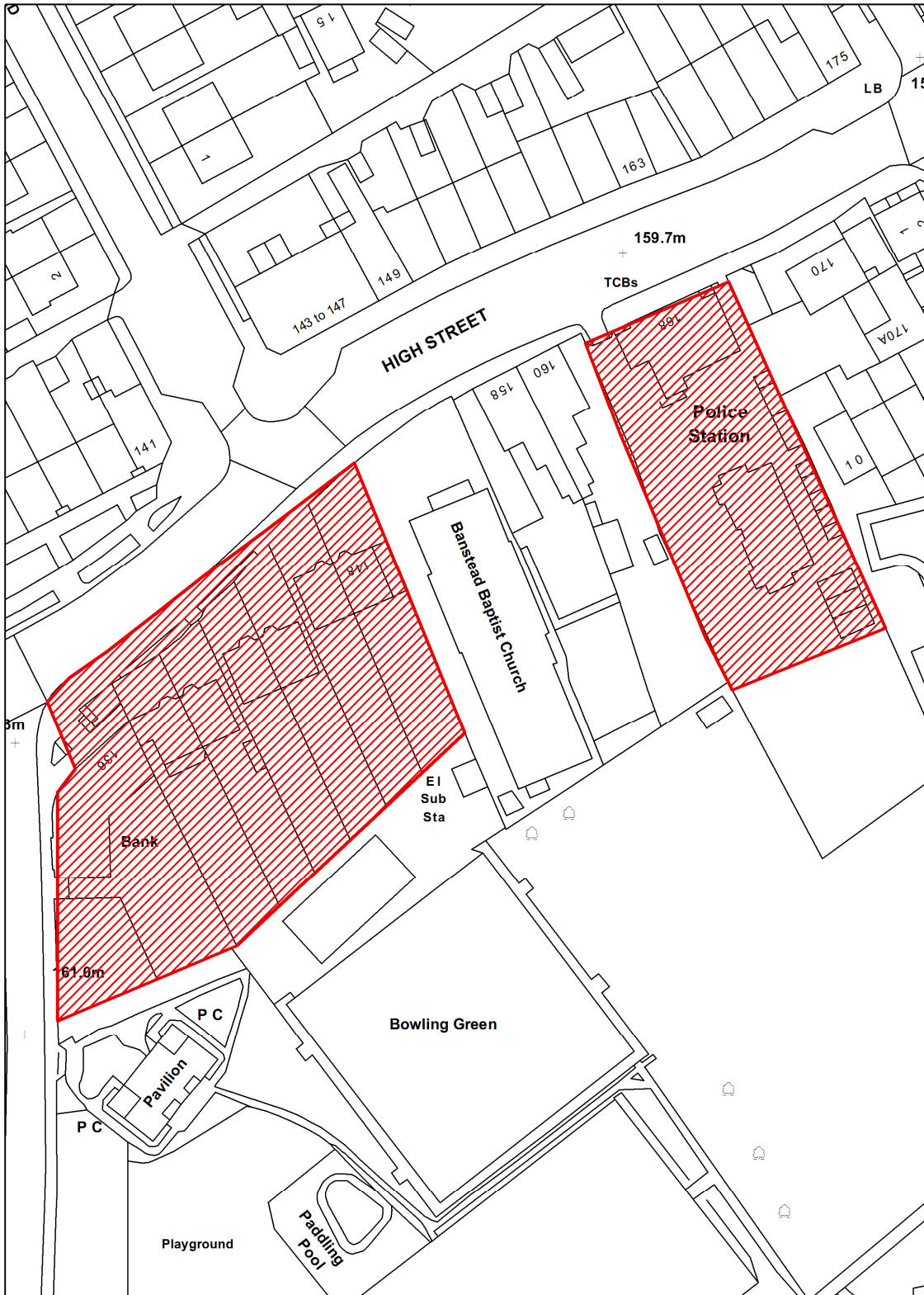
| | |
|---|---|
| 5. For sites in ‘Zone 3b The Functional Floodplain’. | |
| a. Proposed uses for the entire site: | |
| <u>Library and Pool House, Bancroft Road, Reigate:</u> Mixed use including retail, leisure, residential and community uses. Likely to include retail (shops) on ground floor with either commercial (offices) or residential on upper floors. | |
| b. Can the development proposals be redirected to ‘Zone 3a High Probability’? | |
| Yes | Depending on the configuration of the proposal, development could be focussed on the area of the site that sits in FZ1 and FZ2 and the area in FZ3 can be allocated for a less vulnerable use (i.e. parking). If this approach is taken, there is no need to proceed with the Exception Test. |
| No | |
| c. Is the development proposal in the ‘Water Compatible’ classification set out in Table 2 of NPPF Technical Guidance | |
| Yes | N/A |

| | |
|--|---|
| No | N/A |
| 5d. Can the 'essential infrastructure' development types be directed to parts of the site where the Zone is compatible with their vulnerability and risks to occupiers and the premises are reduced? | |
| Yes | Identify how the risks could be reduced: N/A |
| No | N/A <i>Proposals for 'essential infrastructure' in Zone 3b may be appropriate – proceed with the Exception Test.</i> |
| 5d. Can the 'highly vulnerable', 'more vulnerable' or 'less vulnerable' development types be directed to parts of the site where the Zone is compatible with their vulnerability and risks to occupiers and the premises are reduced? | |
| Yes | Identify how the risks could be reduced: Depending on the configuration of the proposal, development could be focussed on the area of the site that sits in FZ1 and FZ2 and the area in FZ3 can be allocated for a less vulnerable use (i.e. parking). If this approach is taken, there is no need to proceed with the Exception Test. |
| No | N/A |

A.3 – Maps

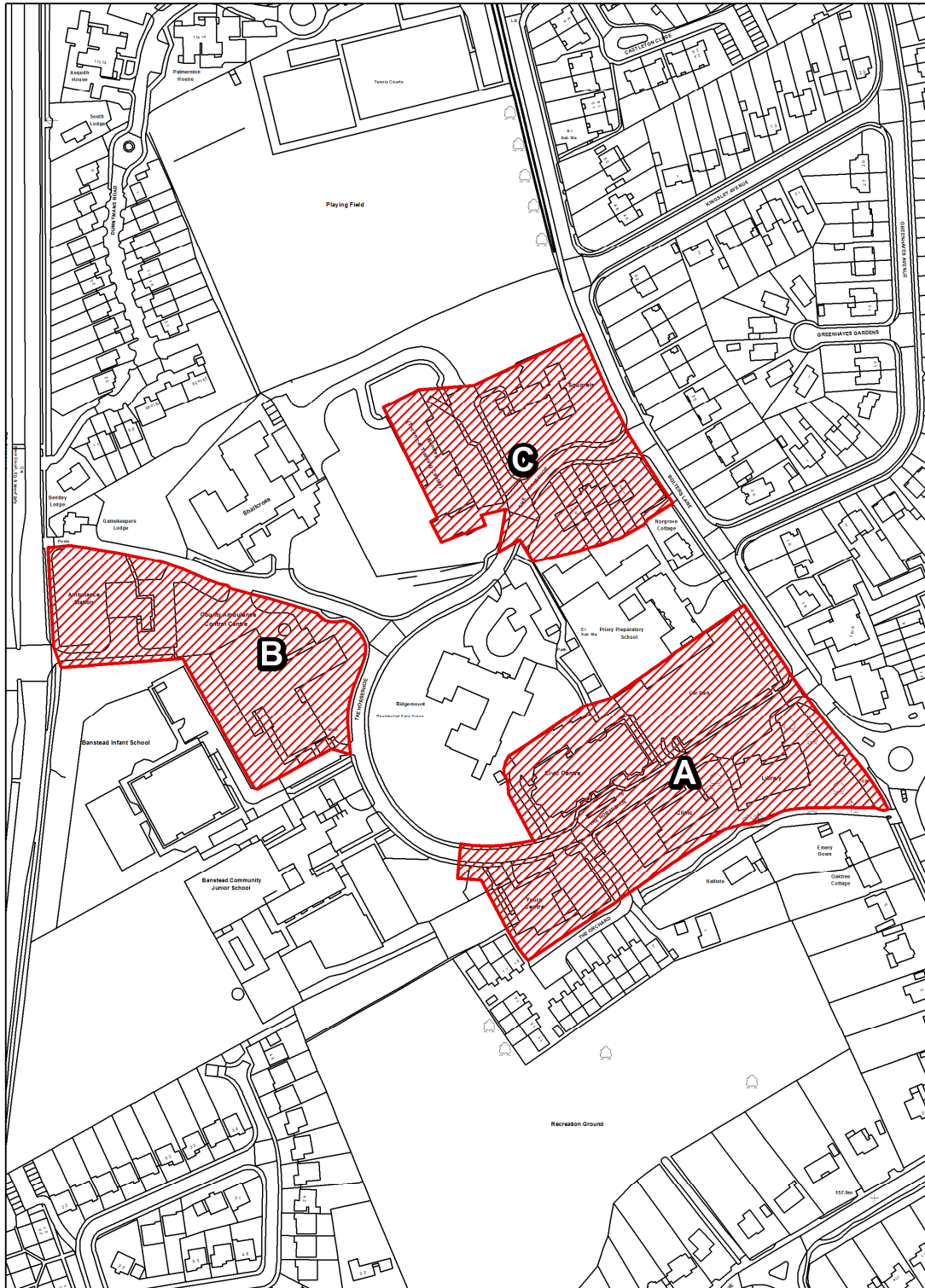
Banstead Town Centre opportunity site

BAN1 - 136-168 High Street, Banstead



Banstead Town Centre site allocation

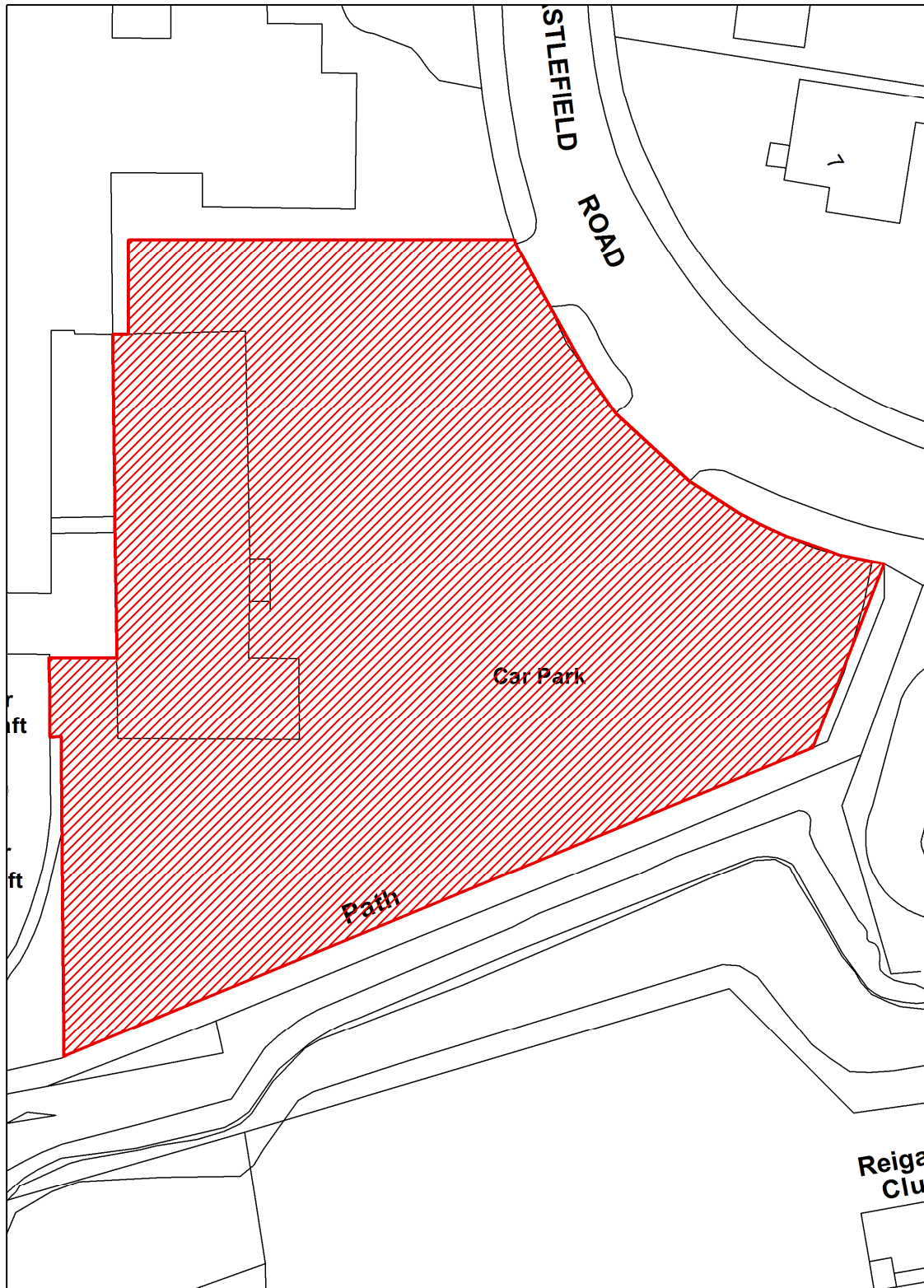
BAN2 - The Horseshoe, Banstead



Reigate Town Centre Opportunity site
Library and Pool House, Bancroft Road, Reigate

Reigate Town Centre site allocation

REI2 - Land Adjacent to the Town Hall, Castlefield Road, Reigate



**Horley Town Centre development site
High Street Car Park, Horley (Historic Flood Map)**

**Horley Town Centre development site
High Street Car Park, Horley (Model Flood Map)**

Horley Town Centre development site

Horley Police Station, Massetts Road, Horley (Historic Flood Map)

**Horley Town Centre development site
Horley Police Station, Massetts Road, Horley (Model Flood Map)**

**Horley Town Centre development site
Library Site, Kings Road (Historic flood map)**

**Horley Town Centre development site
Library Site, Kings Road (Model flood map)**

**Horley Town Centre development site
50-66 Victoria Road, Horley (Historic Flood Map)**

**Horley Town Centre development site
50-66 Victoria Road, Horley (Model Flood Map)**

**Horley Town Centre development site
Telephone Exchange Site, Horley (Historic Flood Map)**

**Horley Town Centre development site
Telephone Exchange Site, Horley (Model Flood Map)**

Appendix B:

Urban site allocations

B.1 – Summary table

| Site Ref. | Site Name | Location | Flood Zone (%) | | | | Proposed Uses | Vulnerability | Sequential Test Passed? |
|-----------|---|----------|----------------|-----|------|------|------------------------------|------------------------------------|--|
| | | | FZ1 | FZ2 | FZ3a | FZ3b | | | |
| A. | BAN3: Banstead Community Centre | Banstead | 100 | 0 | 0 | 0 | Residential Community use | More Vulnerable | Yes |
| B. | RTC4: Colebrook | Redhill | 38 | 62 | 34 | 0 | Residential Community use | More Vulnerable | No – Exception Test required |
| C. | RTC5: Former Longmead centre | Redhill | 100 | 0 | 0 | 0 | Residential | More Vulnerable | Yes |
| D. | RED1: Quarryside Business Park | Redhill | 100 | 0 | 0 | 0 | Residential Community use | More Vulnerable | Yes |
| E. | RED2: Bellway House | Merstham | 100 | 0 | 0 | 0 | Residential | More Vulnerable | Yes |
| F. | RED4: Church of Epiphany | Merstham | 100 | 0 | 0 | 00 | Residential | More Vulnerable | Yes |
| G. | RED5: Merstham Library | Merstham | 64 | 11 | 25 | 0 | Residential Community | More Vulnerable | Yes, development can be directed to areas of lowest risk |
| H. | RED6: Former Oakley Centre | Merstham | 100 | 0 | 0 | 0 | Residential | More Vulnerable | Yes |
| I. | RED8: Land at Reading Arch Road/Brighton Road | Redhill | 31 | 69 | 53 | 21 | Residential Retail | More Vulnerable Less Vulnerable | No – Exception Test required |
| J. | REI3: Albert Road North | Reigate | 100 | 0 | 0 | 0 | Residential Employment | More Vulnerable Less Vulnerable | Yes |

| | | | | | | | | | |
|----|---|--------|-----|---|---|---|-------------|-----------------|-----|
| | Industrial Estate (Opportunity site) | | | | | | | | |
| K. | HOR8: Former Chequers Hotel | Horley | 100 | 0 | 0 | 0 | Residential | More Vulnerable | Yes |
| L. | HOR8a: 59 – 61 Brighton Road | Horley | 100 | 0 | 0 | 0 | Residential | More Vulnerable | Yes |

Note: Bear in mind that FZ3a and b sits within FZ2 when looking at the numbers above

Green – Completely FZ1 (or nominal FZ2/3) and in flood risk terms sequentially preferable for development

Amber – Mix of FZ1/FZ2 and FZ3, development potential to be explored.

Annex B.2 - Sequential Test Questionnaire

| 1. Are the proposed sites in 'Flood Zone 1 – Low Probability' of flood risk? | |
|--|---|
| Yes | <p>Sites wholly in Flood Zone 1 are:</p> <ul style="list-style-type: none"> • Banstead Community Centre, Banstead • Former Longmead Centre, Redhill • Quarryside Business Park, Redhill • Bellway House, Merstham • Church of Epiphany, Merstham • Former Oakley Centre, Radstock Way, Merstham • Albert Road North Industrial Estate, Reigate • Former Chequers Hotel, Horley • 59 – 61 Brighton Road, Horley <p>Sites predominantly in Flood Zone 1 where development can be accommodated without encroachment into Zones 2 and/or 3 include:</p> <p>N/A</p> <p><i>For these sites wholly (or predominantly) in Flood Zone 1 where development can be accommodated without requiring land in higher risk zones, all development types are appropriate and there is no need to proceed further with the Sequential Test.</i></p> |
| No | <p>Sites partly, substantially or wholly in Zones 2 and 3</p> <ul style="list-style-type: none"> • <u>Merstham Library, Merstham</u>: Around 36% of the site is within FZ2 and FZ3 which covers the south west corner/edge of the site • <u>Colebrook, Redhill</u>: Around 62% of the site is within FZ2 and FZ3a • <u>Land at Reading Arch Road/Brighton Road</u>: Around 69% of the site lies within FZ2 and FZ3 a and b. <p><i>For sites partly, substantially or wholly within Flood Zone 2 and 3, proceed to question 2.</i></p> |
| 2. Could the proposed sites in Flood Zones 2 and 3 alternatively be located in or directed to areas in 'Flood Zone 1 Low Probability' of flood risk: | |
| Yes | <ul style="list-style-type: none"> • <u>Merstham Library, Merstham</u>: Development could be focussed on the area of the site that sites in FZ1 (north-western to eastern parts of the site). The presence of flood zones have been taken into account in coming to the DMP consultation document proposed figures and the suggested number of units could be accommodated on FZ1 only. |

The above sites could accommodate development on FZ1 without the need to use land on FZ2 and FZ3, as such there is no need to continue with the sequential test for these sites.

No

a. Explain why the proposals cannot be redirected to Zone 1:

Redhill Town Centre is the largest town centre in the Borough and has the highest potential and opportunity for growth. A significant amount of growth is planned for this town centre in order for it to achieve its regional and local roles, to capitalise on its transport links and to secure regeneration objectives. Whilst these sites are not in the town centre they are adjacent to it.

Development in this location is required in order to support the regeneration of the town centre and to enable it to remain a competitive and viable centre serving the needs of the local population as well as the wider sub-region. There are no reasonable alternatives within the town centre or edge of centre to deliver these objectives, so these sites directly adjacent to the town centre are the next most sequentially suitable. This is in line with national policy which requires main town centre uses, where they need to be accommodated outside of town centres, to be located on accessible sites that are well connected to the town centre, which these sites are.

Growth of the town centre is also physically restricted by surrounding infrastructure. This has an impact on the amount of development sites that are available. As a result, each of the sites identified for some form of development, play a specific role in achieving the spatial strategy for the town centre and delivering the regeneration objectives and benefits. Given Redhill Town Centre's susceptibility to flooding, the majority of available development sites are within flood zones. The sites identified below are in more sensitive flood zones (FZ2 & 3) and there are no other available sites that are not affected by flooding or are in FZ1 to relocate the envisaged scale of development.

- Colebrook: Redevelopment of the site provides the opportunity to consolidate the future provision of community uses whilst delivering residential uses which would be necessary to guarantee the viability of the scheme. Given the location of the site, it also represents the only realistic opportunity for the delivery of family/extra care housing in and around the town centre. Development on this site could not therefore be accommodated on or redirected to land within FZ1.
- Land at Reading Arch Road/Brighton Road: The parts of the site affected by flood zones 2 and 3 are dispersed across the site instead of being concentrated in a discrete area, which would have enabled a scheme to be built around these flood zones. This would make it difficult for comprehensive and efficient development to be achieved on solely FZ1. Given the constrained nature of the town centre, growth

| | |
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| | <p>opportunities outside its existing limits need to be explored. The Reading Arch Road site, adjacent to the town centre boundary, is considered to be the most suitable location for future comparison bulky retail (if necessary), being located close and physically well related to the town centre core. There are no other sites which have been identified as being capable or realistically available to deliver this type of use in such an appropriate location. Development on this site could not therefore be accommodated on or redirected to land within FZ1.</p> <p>b. Identify alternative sites that were considered and explain why they were dismissed.</p> <p>The scope of available sites are limited, therefore no alternatives could be identified. Development of all of the identified sites is required in order to deliver the scale of development required in the town centre.</p> |
|--|--|

**If the site is in ‘Flood Zone 2 Medium Probability’ proceed to Question 3.
If the site is in ‘Flood Zone 3a High Probability’ proceed to Question 4.
If the site is in ‘Flood Zone 3b High Probability’ proceed to Question 5.**

NOTE: If the site is located in more than one Flood Zone, it will be necessary to answer Questions 3, 4 and 5 as necessary for each part of the site in a different Flood Zone.

| | |
|--|--|
| 3. For sites in ‘Zone 2 Medium Probability’ of flood risk. | |
| d. Proposed uses for the entire site: | |
| <ul style="list-style-type: none"> • <u>Colebrook</u>: Community facilities; Residential; extra care homes • <u>Land at Reading Arch Road/Brighton Road</u>: Residential and retail | |
| e. Are the proposed uses in the ‘Water Compatible’, ‘Less Vulnerable’, ‘More Vulnerable’, or ‘Essential Infrastructure’ Flood Risk Vulnerability Classifications set out in Para.066 of the Planning Practice Guidance? | |
| Yes | <p>List the proposed uses in these classifications:</p> <ul style="list-style-type: none"> • <u>Colebrook</u>: More vulnerable: Residential and community facilities • <u>Land at Reading Arch Road/Brighton Road</u>: More vulnerable: residential Less Vulnerable: retail <p><i>These proposals are appropriate if located in Flood Zone 2 and there is no need to proceed with the Exception Test for the parts of the site in Flood Zone 2. Proceed to Question 4 for the parts of the site in Flood</i></p> |

| | |
|---|--|
| | Zone 3. |
| No | <p>List the proposed uses not in these classifications:</p> <p>N/A: There are no 'highly vulnerable' uses planned on any of the identified sites.</p> |
| f. Can the more flood sensitive development types ('highly vulnerable') be directed to parts of the site where the risks are lower for both the occupiers and the premises themselves? | |
| Yes | <p>Identify how the risks have been reduced:</p> <p>N/A – no highly vulnerable development types are proposed</p> |
| No | <p>Explain why the development types cannot be relocated:</p> <p>N/A – no highly vulnerable uses proposed</p> |

| | |
|---|---|
| 4. For sites in 'Zone 3a High Probability and Zone 3b Functional Flood Plain' of flood risk. | |
| a. Proposed uses for the entire site: | |
| <ul style="list-style-type: none"> • <u>Colebrook</u>: Community facilities; Residential; extra care homes • <u>Land at Reading Arch Road/Brighton Road</u>: Residential and retail | |
| b. Could the proposed development on sites in Flood Zone 3 alternatively be located on sites in 'Flood Zone 2 Medium Probability' of flood risk: | |
| Yes | N/A |
| No | <p>Explain why the development types cannot be relocated</p> <p>Development of all of the identified sites is required in order to deliver the scale of development required in (or in close proximity to) the town centre.</p> <p>The rationale for the proposed mix of uses for each site has been discussed in Q2a above. There is no scope to develop any of the lesser flood risk sites for the proposed uses or without making development unacceptable with respect to other planning requirements (e.g. density, fit with character, neighbour amenity).</p> <ul style="list-style-type: none"> • |
| c. Are the proposed uses in the 'Water Compatible' or 'Less Vulnerable' Flood Risk Vulnerability Classifications set out in Table 2 of NPPF Technical Guidance | |
| Yes | List the proposed uses in these classifications: |

| | |
|---|--|
| | <ul style="list-style-type: none"> • <u>Land at Reading Arch Road/Brighton Road:</u> <i>Less Vulnerable:</i> retail |
| No | <p>List the proposed uses not in these classifications:</p> <ul style="list-style-type: none"> • <u>Colebrook:</u> <i>More vulnerable:</i> Residential • <u>Land at Reading Arch Road/Brighton Road:</u> <i>More vulnerable:</i> Residential <p><i>For these proposed uses proceed to Question 4d and 4e</i></p> |
| <p>d. Can the ‘more vulnerable’ or ‘essential infrastructure’ development types be directed to parts of the site where the Flood Zone is compatible with their vulnerability and risks to both occupiers and premises are reduced?</p> | |
| Yes | <p>Identify how the risks could be reduced:</p> <p>N/A</p> |
| No | <p>Explain why the development types cannot be relocated:</p> <p>An extensive search for suitable sites in the urban areas have been carried out but this has revealed that there is limited site availability in the urban areas. The full potential of the identified sites need to be explored to deliver as much of the required target within urban areas as possible in line with policy, subject to viability and design issues. This specifically applies to uses such as retail and community, which need to be centrally located to ensure the are accessible to residents and support the continued vitality and viability of town centres in line with national policy</p> <ul style="list-style-type: none"> • <u>Colebrook:</u> Development capacity of the site could be reduced. This would enable more vulnerable uses (residential and community) to be accommodated only on those areas where their vulnerability is compatible with the level of flood risk (i.e. FZ2 or FZ1). However, optimum development could not be accommodated on site without encroaching upon flood zone 2 and 3a, particularly given flood zone 3a is not all contained in one discrete area. • <u>Land at Reading Arch Road/Brighton Road:</u> <p>Given the constrained nature of the town centre, growth opportunities for bulky good retail provision outside its existing limits need to be explored. The Reading Arch Road site is considered to be the most suitable location for future comparison retail expansion (if necessary), being located reasonably close and physically well related to the town centre core. There are no other sites which have been identified as being capable or realistically available to deliver this.</p> |

| f. Can the 'highly vulnerable' development types be directed to parts of the site where the Flood Zone is compatible with their vulnerability and risks to both occupiers and premises are reduced? | |
|--|---|
| Yes | Identify how the risks could be reduced: N/A – no highly vulnerable development types proposed |
| No | N/A – no highly vulnerable development types proposed |

| 5. For sites in 'Zone 3b The Functional Floodplain'. | |
|---|---|
| a. Proposed uses for the entire site: | |
| Land at Reading Arch Road/Brighton Road: Residential and retail | |
| b. Can the development proposals be redirected to 'Zone 3a High Probability'? | |
| Yes | |
| No | The rationale for the proposed mix of uses for each site has been discussed in Q2a above. There is limited scope to develop any of the lesser flood risk sites for the uses proposed in areas of higher flood risk without conflicting with the strategy for Redhill to which this site contributes. There is limited scope to develop any of the lesser flood risk sites for the proposed uses or without making development unacceptable with respect to other planning requirements (e.g. density, fit with character, neighbour amenity). |
| c. Is the development proposal in the 'Water Compatible' classification set out in Table 2 of NPPF Technical Guidance | |
| Yes | N/A |
| No | N/A |
| 5d. Can the 'essential infrastructure' development types be directed to parts of the site where the Zone is compatible with their vulnerability and risks to occupiers and the premises are reduced? | |
| Yes | Identify how the risks could be reduced: N/A |
| No | N/A <i>Proposals for 'essential infrastructure' in Zone 3b may be appropriate – proceed with the Exception Test.</i> |
| 5d. Can the 'highly vulnerable', 'more vulnerable' or 'less vulnerable' development types be directed to parts of the site where the Zone is compatible with their | |

vulnerability and risks to occupiers and the premises are reduced?

Yes

Identify how the risks could be reduced:

Land at Reading Arch Road/Brighton Road: Development could be directed to only those parts of the site in Zones 3a or lower. However, optimum development could not be accommodated on site without encroaching upon flood zones which are incompatible with the uses proposed.

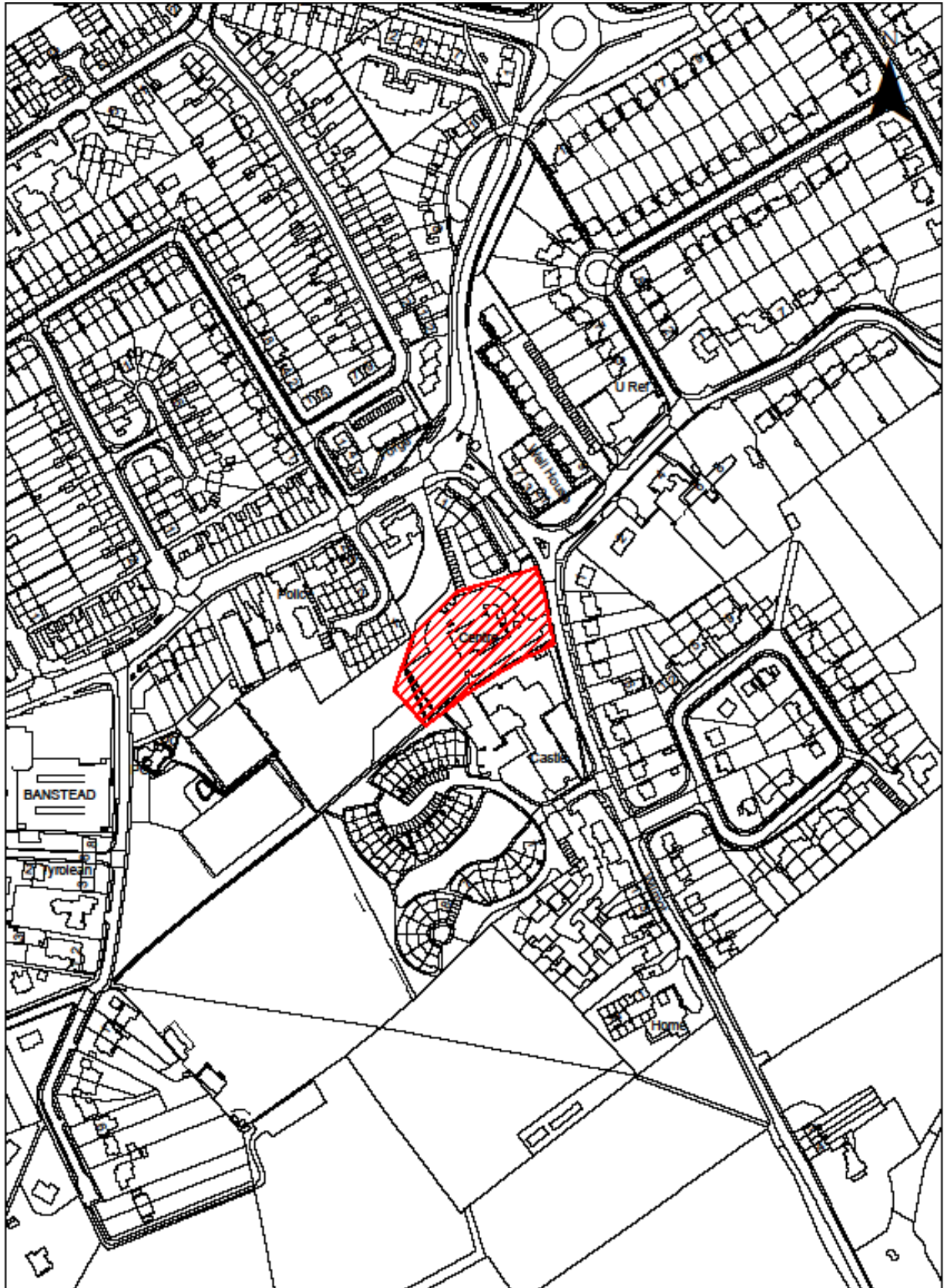
More vulnerable residential uses could be located above less vulnerable uses with dry access and egress, therefore reducing risks to premises and occupiers; however, this would still require the Exception Test to be satisfied – particularly in respect of demonstrating the safety of users for the lifetime of the development.

No

N/A

B.3 – Maps

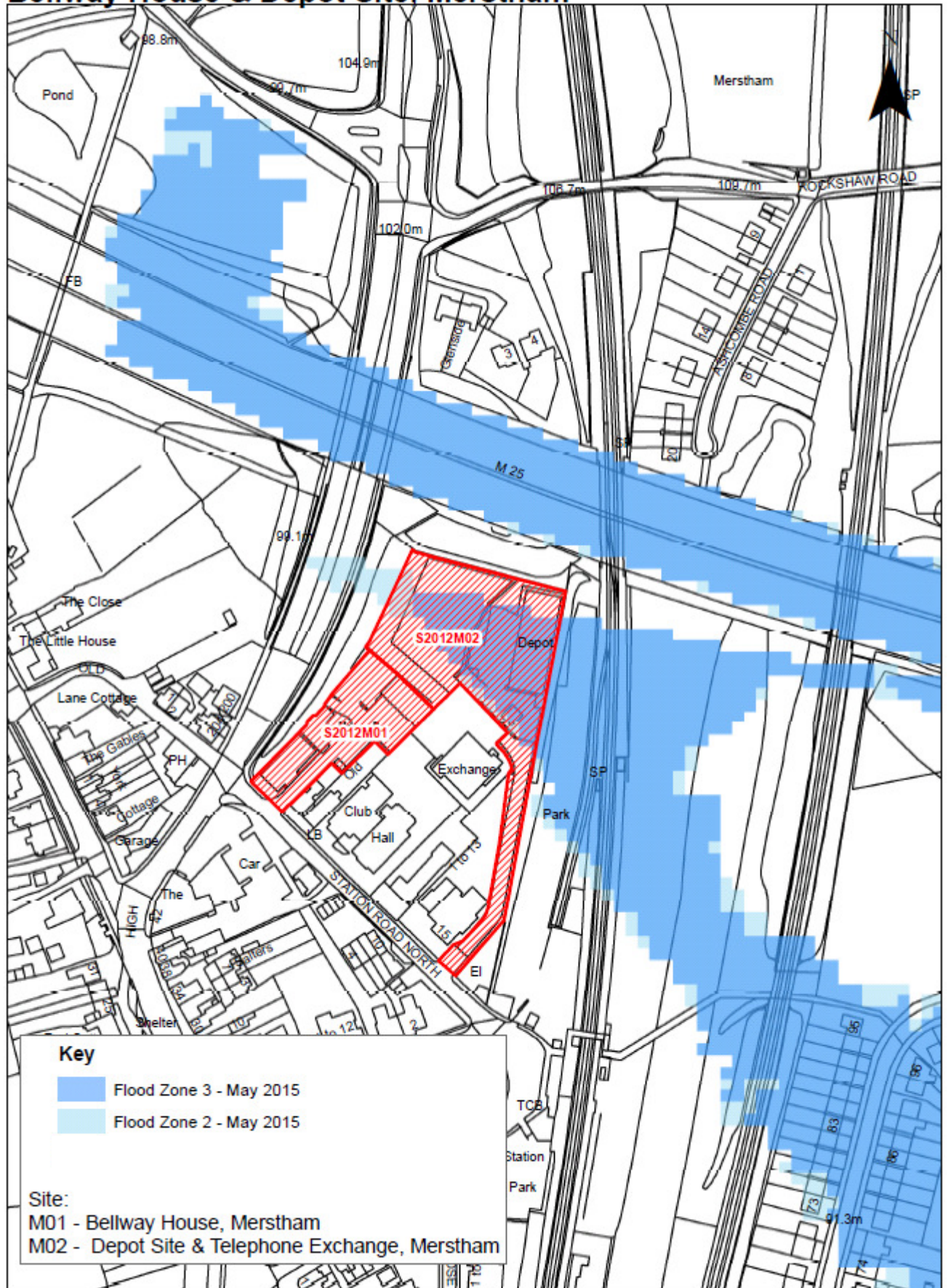
**Banstead Urban Housing Site
Banstead Community Centre**



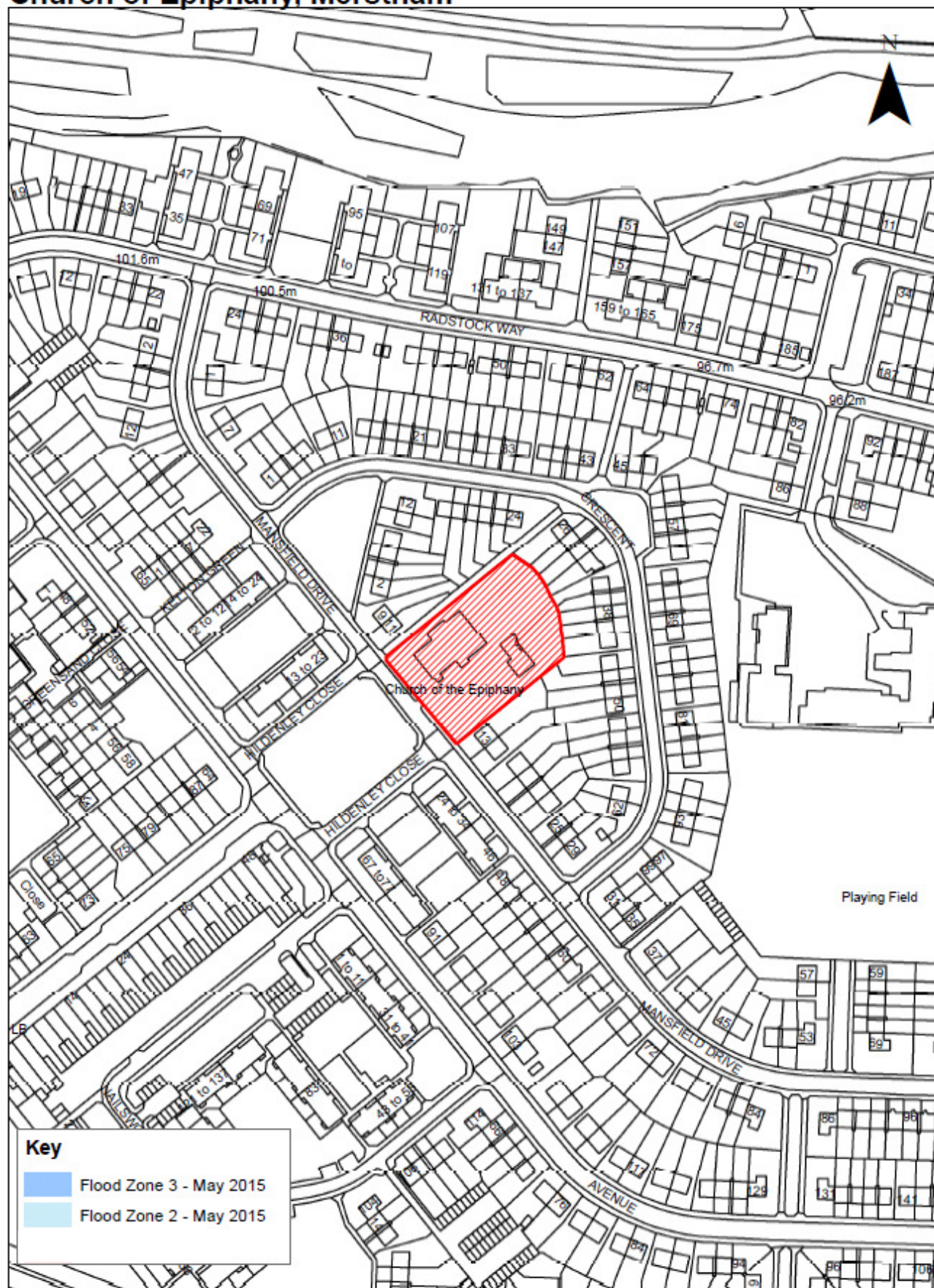
Redhill Urban Housing Site Quarryside Business Park, Redhill



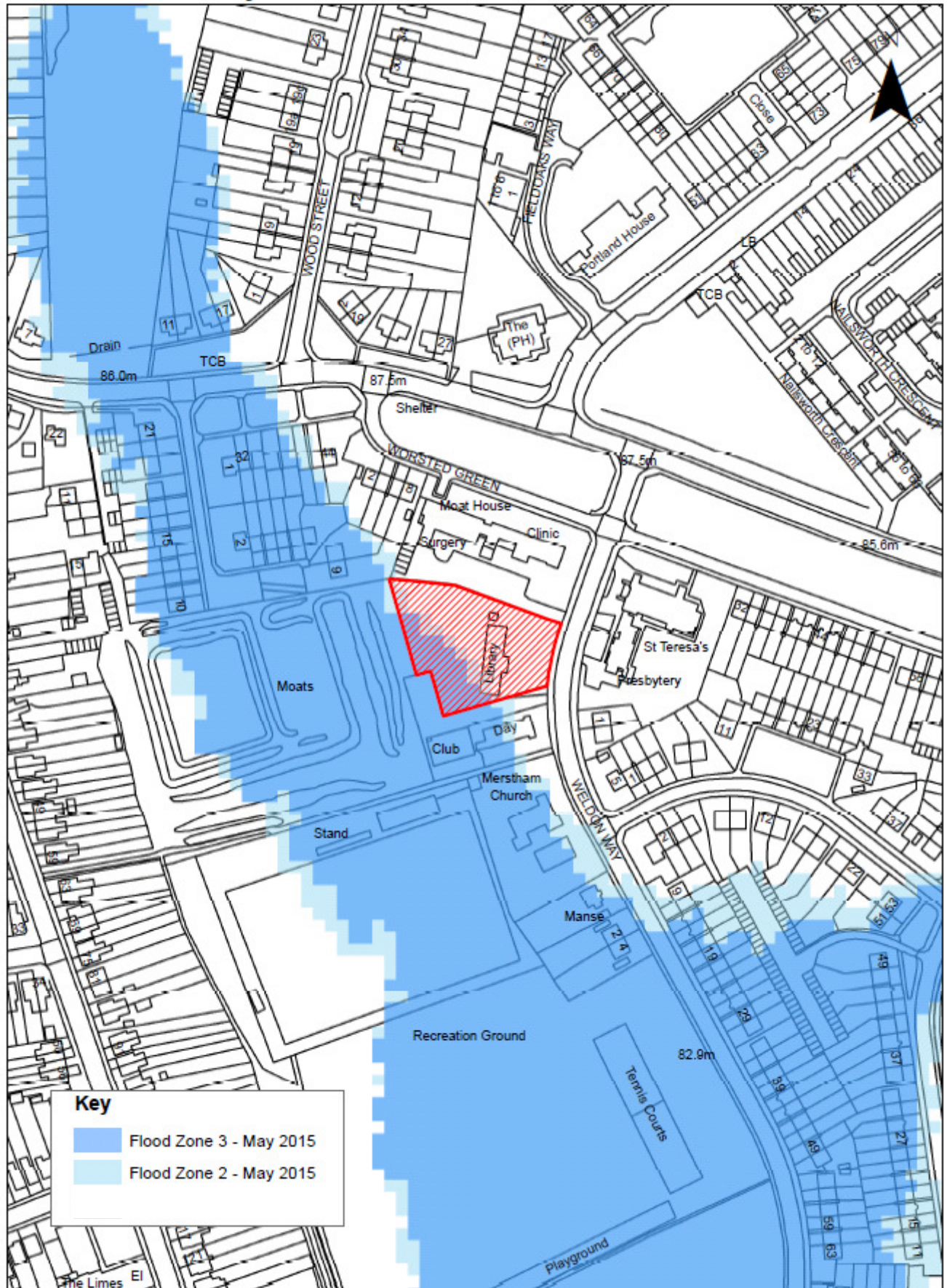
Redhill Urban Housing Site Bellway House & Depot Site, Merstham



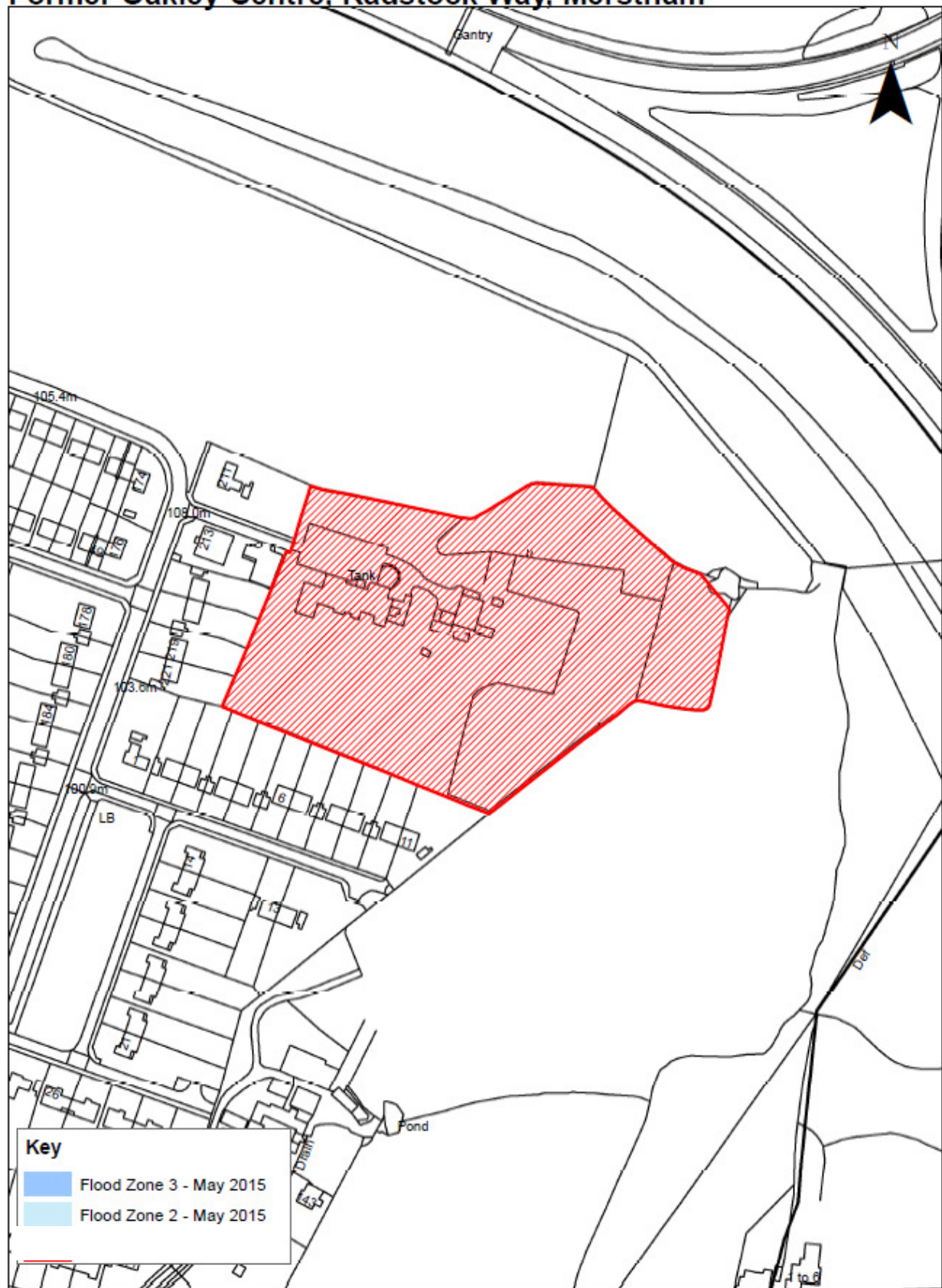
Merstham Urban Housing Site Church of Epiphany, Merstham



Merstham Urban Housing Site Merstham Library

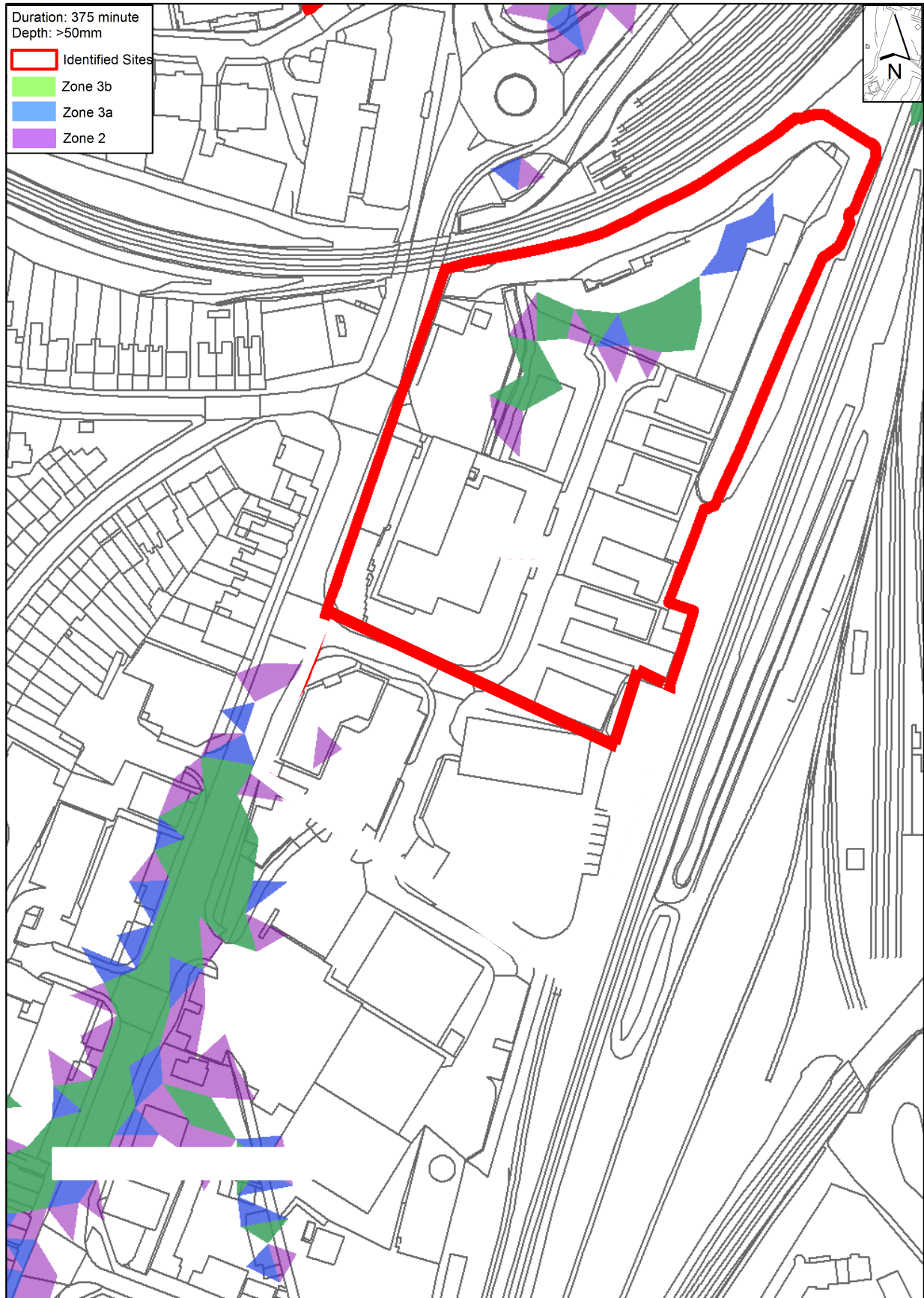


Merstham Urban Housing Site Former Oakley Centre, Radstock Way, Merstham

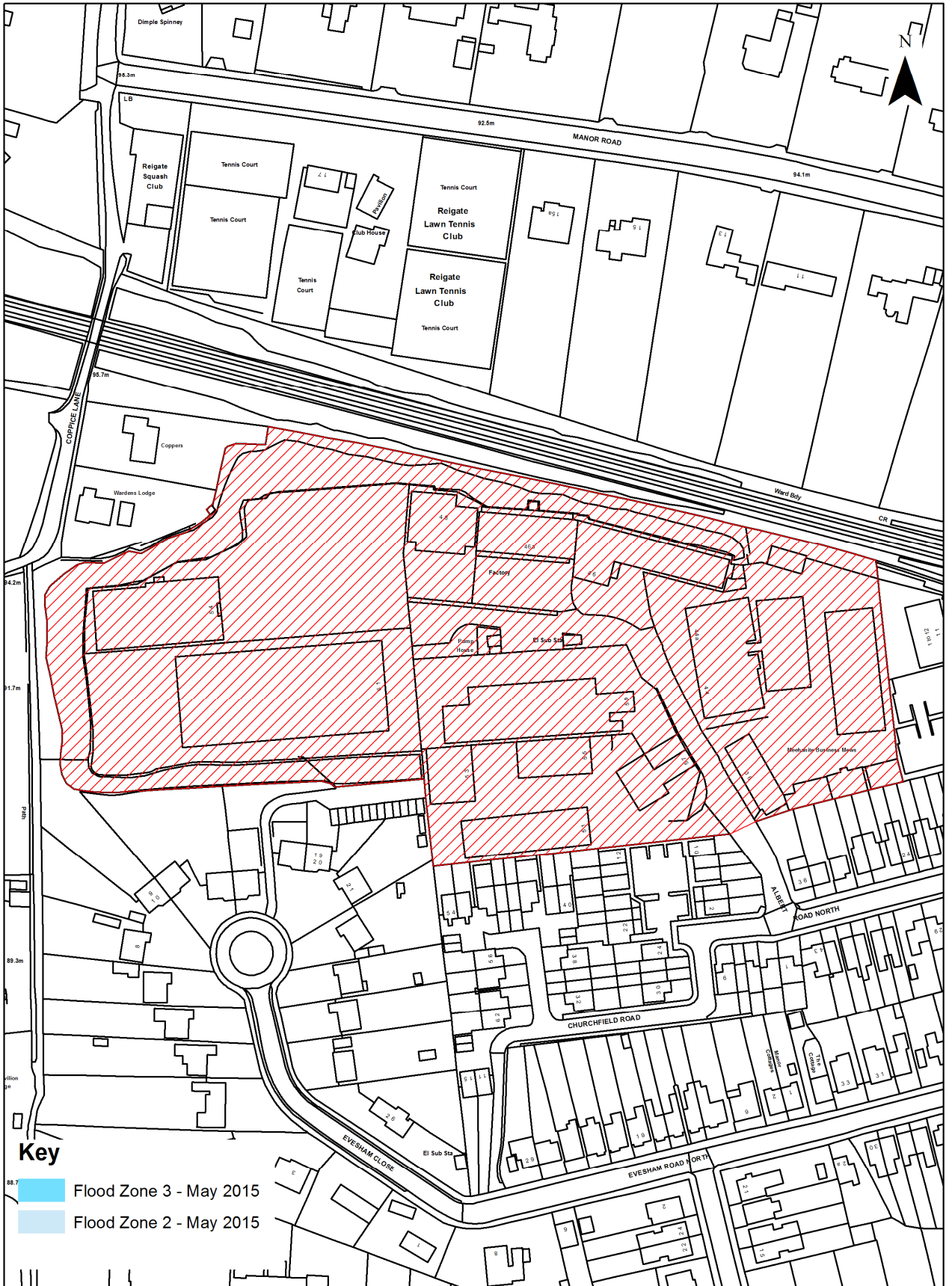


Redhill Urban Housing Site Land at Reading Arch Road/Brighton Road

(Flood map taken from the "Sequential test for flood risk: Addendum for Redhill town centre")



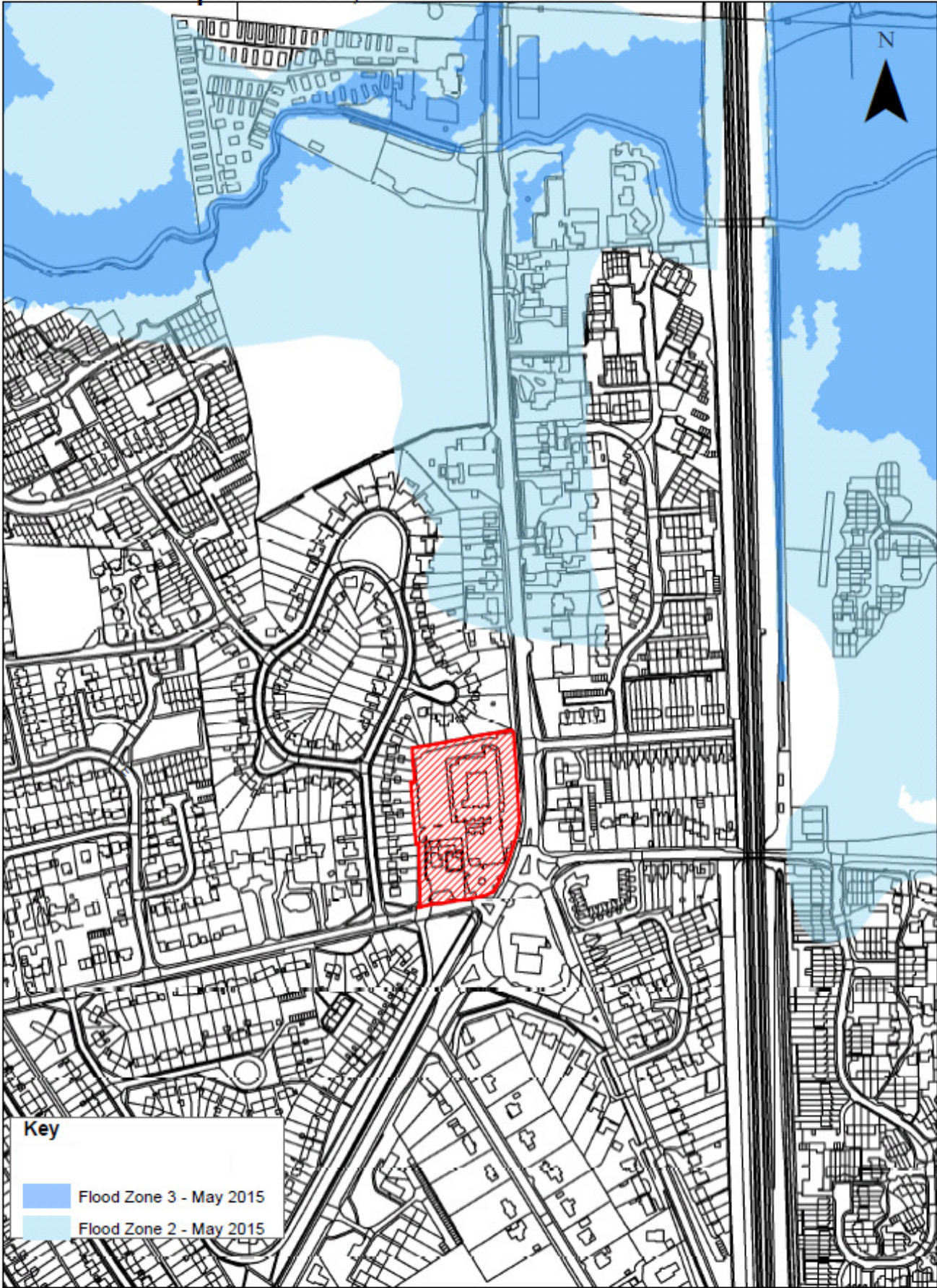
Reigate Urban Housing Site Albert Road North Industrial Estate



Key

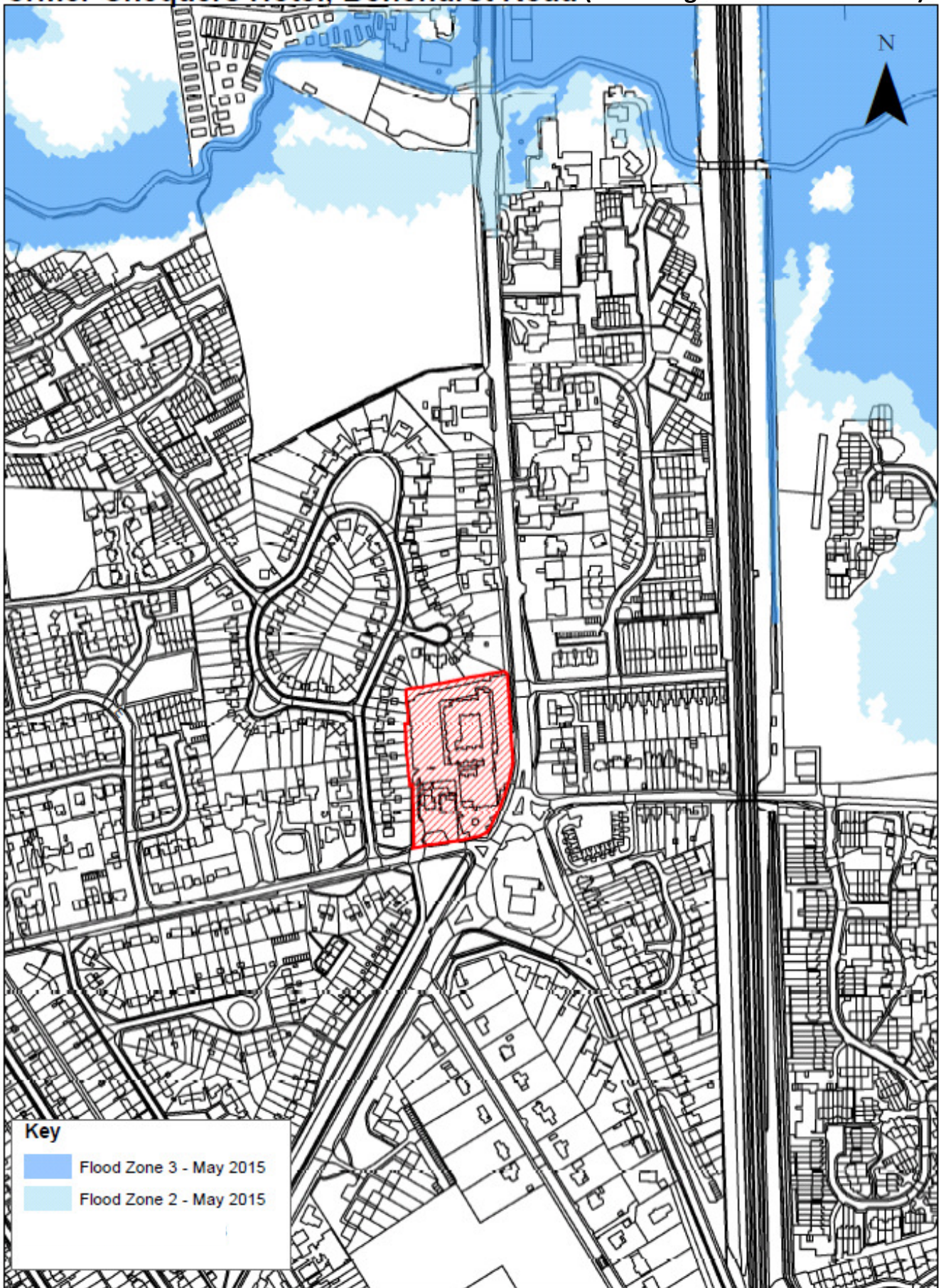
- Flood Zone 3 - May 2015
- Flood Zone 2 - May 2015

**Urban Housing Site - Horley
Former Chequers Hotel, Bonehurst Road**



Urban Housing Sites - Horley

Former Chequers Hotel, Bonehurst Road (excluding historic flood event)



Appendix C:

Development outside the existing urban area

C.1 - Summary table (note that this includes all sites assessed for development potential. Sites marked with # have not been taken forward as site allocations in the draft DMP)

| Site Ref. | Site Name | Location | Flood Zone (%) | | | Proposed Uses | Vulnerability | Sequential Test Passed? |
|------------------|---------------------------------|--------------------|----------------|-----|-----|--|--|-------------------------|
| | | | FZ1 | FZ2 | FZ3 | | | |
| ERM1 | Land at Hillsbrow | East Redhill | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| ERM2/3 | Land west of Copyhold Works | East Redhill | 100 | 0 | 0 | Residential Education/community Open space | More Vulnerable Water-compatible | Yes |
| ERM4 (and 4a) | Land south of Bletchingley Road | East Merstham | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| ERM5 | Land at Oakley Farm | East Merstham | 100 | 0 | 0 | Residential Employment Open Space | More Vulnerable Less Vulnerable | Yes |
| ERM6 | Land north of Radstock Way # | East Merstham | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| SSW1 | Land north of Park Lane East # | South Reigate | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| SSW2 | Land at Sandcross Lane | South west Reigate | 100 | 0 | 0 | Residential Commercial/retail Health Open space | More Vulnerable Less Vulnerable Water-compatible | Yes |

| | | | | | | | | |
|-------|------------------------------------|--------------------|------|-----|-----|---------------------------|-------------------------------------|--|
| | | | | | | | | |
| SSW3 | King George's Field # | South west Reigate | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| SSW4 | Clayhall Farm # | South west Reigate | 88.8 | 0.2 | 11 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SSW5 | Land south of Slipshatch Road # | South west Reigate | 82.6 | 0.4 | 17 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SSW6 | Land west of Castle Drive # | South west Reigate | 40 | 2 | 58 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SSW7 | Land at Hartswood Nursery | South west Reigate | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| SSW8 | Land at Hartswood Playing Fields # | South west Reigate | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| SSW9 | Land at Dovers Farm | South west Reigate | 99.3 | 0.4 | 0.3 | Residential | More Vulnerable | Yes |
| SSW10 | Land east of Dovers Green Road # | South west Reigate | 97 | 1 | 2 | Residential | More Vulnerable | Yes |
| NWH1 | Land at Meath Green Lane | North Horley | 55 | 8 | 37 | Residential Open space | More Vulnerable Water-compatible | Yes – development can be directed to FZ1 only. |
| NWH2 | Land at Bonehurst Road | North Horley | 27 | 65 | 8 | Residential Open space | More Vulnerable Water-compatible | Yes – development can be directed to FZ1 only. |
| EH1 | Land at | East Horley | 54.8 | 45 | 0.2 | Residential | More | Yes – development can be |

| | | | | | | | | |
|------|---|-------------------|-----|----|----|-------------|-----------------|---|
| | Langshott Wood # | | | | | | Vulnerable | directed to FZ1 only. |
| EH2 | Brook Wood # | East Horley | 0 | 57 | 43 | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| EH3 | Land north of Smallfield Road # | East Horley | 0 | 86 | 14 | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| SEH1 | Land at Fishers Farm and Bayhorne Farm | South East Horley | 51 | 49 | 0 | Office | Less Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH2 | Land between Balcombe Road and railway | South East Horley | 100 | 0 | 0 | Office | Less Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH3 | Land east of Balcombe Road # | South East Horley | 79 | 14 | 7 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH4 | Land at The Close and south of Haroldslea Drive | South East Horley | 74 | 14 | 12 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH5 | Land west of Burstow Stream # | South East Horley | 82 | 10 | 8 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH6 | Land at Newstead Hall # | South East Horley | 0 | 95 | 5 | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are |

| | | | | | | | | |
|-------|----------------------------------|-------------------|----|----|----|-------------|-----------------|---|
| | | | | | | | | alternative preferable sites |
| SEH7 | Land at Wilgers Farm # | South East Horley | 17 | 47 | 36 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH8 | Land at Farney View Farm # | South East Horley | 5 | 68 | 27 | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| SEH9 | Land east of Wilgers Farm # | South East Horley | 1 | 75 | 24 | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |
| SEH10 | Land east of Farney View Farm # | South East Horley | 27 | 67 | 6 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH11 | Land at Harrowsley Green Farm # | South East Horley | 29 | 53 | 18 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |
| SEH12 | Land south of Haroldslea Drive # | South East Horley | 5 | 75 | 20 | Residential | More Vulnerable | No – development could not be directed to FZ1. Site is not sequentially preferable and there are alternative preferable sites |

FZ3 sits within FZ2 so the above FZ2 figures omits any FZ2 which is also covered by FZ3 to enable a percentage of non FZ1 to be achieved.

Green – Completely FZ1 (or nominal FZ2/3) and in flood risk terms sequentially preferable for development

Amber – Mix of FZ1/FZ2 and FZ3, development potential to be explored.

Red - Completely FZ2/FZ3 (or nominal FZ1) and in flood risk terms likely to be unsuitable for development.

C.2 - Sequential Test Questionnaire

Note: The assessments for the Horley sites include a summary of the EA maps produced in the latter part of 2013 to demonstrate what the improvements in flood zones could look like. However, these summaries are only for reference at this stage for sites in Horley as the Council is taking a precautionary approach relying upon the historic EA flood mapping (on the advice of the EA), until such time as the EA flood investigations are concluded and updated modelling is produced. When updated modelling is available, the sequential test approach will be revisited in consultation with the EA.

5. Are the proposed sites in 'Flood Zone 1 – Low Probability' of flood risk?

Yes

Sites wholly in Flood Zone 1 are:

- East Redhill - ERM1
- East Redhill - ERM2
- East Redhill - ERM3
- East Merstham - ERM4
- East Merstham - ERM5
- East Merstham - ERM6
- South Reigate - SSW1
- South Reigate - SSW2
- South Reigate - SSW3
- South Reigate - SSW7
- South Reigate - SSW8
- South East Horley - SEH2

Sites predominantly in Flood Zone 1 where development can be accommodated without encroachment into Zones 2 and/or 3 include:

Two sites have a very minor amount of land within FZ2 and/or FZ3 and development could be accommodated in FZ1 without requiring incorporation of the land within Zones 2 and/or 3. Therefore, for the purposes of development these sites can be considered as being in Flood Zone 1. These sites are as follows:

- South Reigate - SSW9: Largely in FZ1 with a very small area to the southeast corner of the site in FZ2 and FZ3 (approx. 0.5% of the site in FZ2 and approx. 0.3% of the site in FZ3). This would not constrain or reduce the development potential of the site.
- South Reigate - SSW10: Largely in FZ1 with a very small area along the eastern border of the site in FZ2 and FZ3 (approx. 1% of the site in

| | |
|-----------|---|
| | <p>FZ2 and approx. 2% of the site in FZ3). This would not constrain or reduce the development potential of the site.</p> <p><i>For these sites wholly (or predominantly) in Flood Zone 1 where development can be accommodated without requiring land in higher risk zones, all development types are appropriate and there is no need to proceed further with the Sequential Test.</i></p> |
| No | <p>Sites partly, substantially or wholly in Zones 2 and 3:</p> <ul style="list-style-type: none"> • South Reigate - SSW4 • South Reigate - SSW5 • South Reigate - SSW6 • North Horley NWH1 • North Horley NWH2 • East Horley – EH1 • East Horley – EH2 • East Horley – EH3 • South East Horley - SEH1 • South East Horley - SEH3 • South East Horley - SEH4 • South East Horley - SEH5 • South East Horley - SEH6 • South East Horley - SEH7 • South East Horley - SEH8 • South East Horley - SEH9 • South East Horley - SEH10 • South East Horley - SEH11 • South East Horley - SEH12 <p><i>For sites partly, substantially or wholly within Flood Zone 2 and 3, proceed to question 2.</i></p> |

6. Could the proposed sites in Flood Zones 2 and 3 alternatively be located in or directed to areas in 'Flood Zone 1 Low Probability' of flood risk:

| | |
|------------|---|
| Yes | <ul style="list-style-type: none"> • <u>South Reigate - SSW4</u>: The south-western part of the site has a band of FZ2 and FZ3 (approx. 11% of the site) cutting across. This leaves approx. 89% of the site in FZ1. |
|------------|---|

- South Reigate - SSW5: The southern border of the site is in FZ3 (approx. 17% of the site), so approx. 83% of the site is within FZ1.
 - South Reigate - SSW6: The north west part of the site lies within FZ2 and 3 (approx. 60%), leaving approx. 40% in FZ1.
 - North Horley - NWH1: Approximately half of the site sits in FZ1 with the remainder predominantly in FZ3 (approx. 46% of the site) with a small amount of FZ2 in the centre of the site (approx. 9% of the site).
The Environment Agency provided an update of the flood maps in 2013/14, which do not reduce the extent of flood zones on the site.
 - North Horley - NWH2: The northern and south east part of the site lies in FZ2 (approx. 63% of the site) with a band of FZ3 along the north western border of the site (approx. 7% of the site). The south eastern part of the site lies within FZ1 (approx. 30% of the site)
The updated EA maps show FZ2 significantly reduced and concentrated along the northern part of the site. FZ3 remains restricted to the north western parts of the site.
 - East Horley – EH1: The site is approx. 45% in FZ2 leaving around half of the site in FZ1.
The Environment Agency provided an update of the flood maps in 2013/14, which removes all of the FZ2 apart from very minor incursions along the northern boundary of the site.
 - South East Horley - SEH1: Approx. half of the site is in FZ2 (northern and southeastern corner) and the rest is in FZ1.
The updated EA maps show the entire site being in FZ1.
 - South East Horley - SEH3: Almost a quarter of the site is in FZ2 (approx. 14% of the site) and FZ3 (approx. 7% of the site) in a band cutting across the site from north to south. Just over three quarters of the site is within FZ1.
The Environment Agency provided an update of the flood maps in 2013/14, which do not show a reduction in the extent of the flood zones on the site.
- South East Horley - SEH4: The western border of the site is affected by FZ2 (approx. 14% of the site) and FZ3 is concentrated along the boundary (FZ3 accounting for approx. 12% of the site). Around 74% of the site is within FZ1.
The Environment Agency provided an update of the flood maps in 2013/14, which shows a slight reduction in FZ2 coverage of the site.
- South East Horley - SEH5: Approx. 10% of the site is in FZ2 (largely the northern edge of the site) and FZ3 accounts for around 8% of the site largely in the south-eastern corner of the site. This leaves around 82% of

| | |
|----|---|
| | <p>the site within FZ1. <i>The Environment Agency provided an update of the flood maps in 2013/14, which do not show a reduction in the extent of flood zones on the site.</i></p> <ul style="list-style-type: none"> • <u>South East Horley - SEH7</u>: approximately 83% of the site sits in FZ2 & 3 (approx. 47% in FZ2 and 36% in FZ3). This leaves around 17% of the site in FZ1. <i>The Environment Agency provided an update of the flood maps in 2013/14, which shows a slight reduction in the flood zones on the site – leaving the western half within FZ1.</i> • <u>South East Horley - SEH10</u>: The site is predominantly in FZ2 (approx. 67% of the site) and approx. 6% is FZ3. This leaves approx. 27% of the site in FZ1. <i>The Environment Agency provided an update of the flood maps in 2013/14, which do not indicate a substantial reduction in the extent of flood zone.</i> • <u>South East Horley - SEH11</u>: Around 2 thirds of the site sit within FZ2&3 with FZ3 concentrated along the northern border. The remaining part of the site (approx. 29% of the site) sits within FZ1. <i>The Environment Agency provided an update of the flood maps in 2013/14, which shows a marked reduction in FZ2.</i> <p><i>All of the above sites could accommodate some development on FZ1 without the need to use land on FZ2 and FZ3, as such there is no need to continue with the sequential test for these sites. Further consideration of their suitability as development sites is considered in the Sustainable Urban Extensions (Stage 2) Site Specific Technical Report.</i></p> |
| No | <p>a) Identify alternative sites that were considered and explain why they were dismissed.</p> <p>The Core Strategy sets out the broad strategic locations for growth which provided the initial parameters for site searches. All the sites that have subsequently been identified in these broad areas and have been considered have been included in this assessment. The text in red identifies why these sites were not taken forward following further testing of the sites, including conclusions from the Sustainability Appraisal and Green Belt assessment.</p> <ul style="list-style-type: none"> • <u>East Horley – EH2</u>: The site is wholly in FZ2 and 3, the latter spread across the north east side of the site. As such, development could not be directed to FZ1. Identified growth could be accommodated on more sequentially preferable sites. This site is not sequentially preferable and therefore should not be prioritised for development. <i>The Environment Agency provided an update of the flood maps in 2013/14, which shows a marked reduction in FZ2 but little to no</i> |

difference in FZ3.

- East Horley – EH3: The site is wholly in FZ2 (approx. 86%) and FZ3 (approx. 14%). As such, development could not be directed to FZ1. Identified growth could be accommodated on more sequentially preferable sites. **This site is not sequentially preferable and therefore should not be prioritised for development.**

The Environment Agency provided an update of the flood maps in 2013/14, which shows a marked reduction in FZ2 but little to no difference in FZ3.

- South East Horley - SEH6: The vast majority of the site is FZ2 (approx. 95% of the site) with a small amount in FZ3 (approx. 5% of the site), and no FZ1 land. As such, development could not be directed to FZ1. Identified growth could be accommodated on more sequentially preferable sites. - **This site is not sequentially preferable and therefore should not be prioritised for development.**

The Environment Agency provided an update of the flood maps in 2013/14, which shows a significant reduction in FZ2 – reduced to just a small part of the site along the eastern border.

South East Horley - SEH8: The site is predominantly in FZ2 & 3 (approx. 68% in FZ2 and 27% in FZ3) leaving a sliver of FZ1 on the western corner. Development could not be directed to FZ1. Identified growth could be accommodated on more sequentially preferable sites. **This site is not sequentially preferable and therefore should not be prioritised for development**

The Environment Agency provided an update of the flood maps in 2013/14, which shows a reduction in FZ2. FZ3 remains unchanged and cuts across the western part of the site.

- South East Horley - SEH9: The vast majority of the site is in FZ2 & 3 (approx. 75% in FZ2 and 24% in FZ3) and only 1% of the site is in FZ1. As such, development could not be directed to FZ1. Identified growth could be accommodated on more sequentially preferable sites. **This site is not sequentially preferable and therefore should not be prioritised for development**

The Environment Agency provided an update of the flood maps in 2013/14, which shows a slight reduction in FZ2.

- South East Horley - SEH12: The site is predominantly in FZ2 & 3 with FZ3 concentrated along the stretch of the western border. Part of the site sits within FZ1. **This site is not sequentially preferable and therefore should not be prioritised for development**

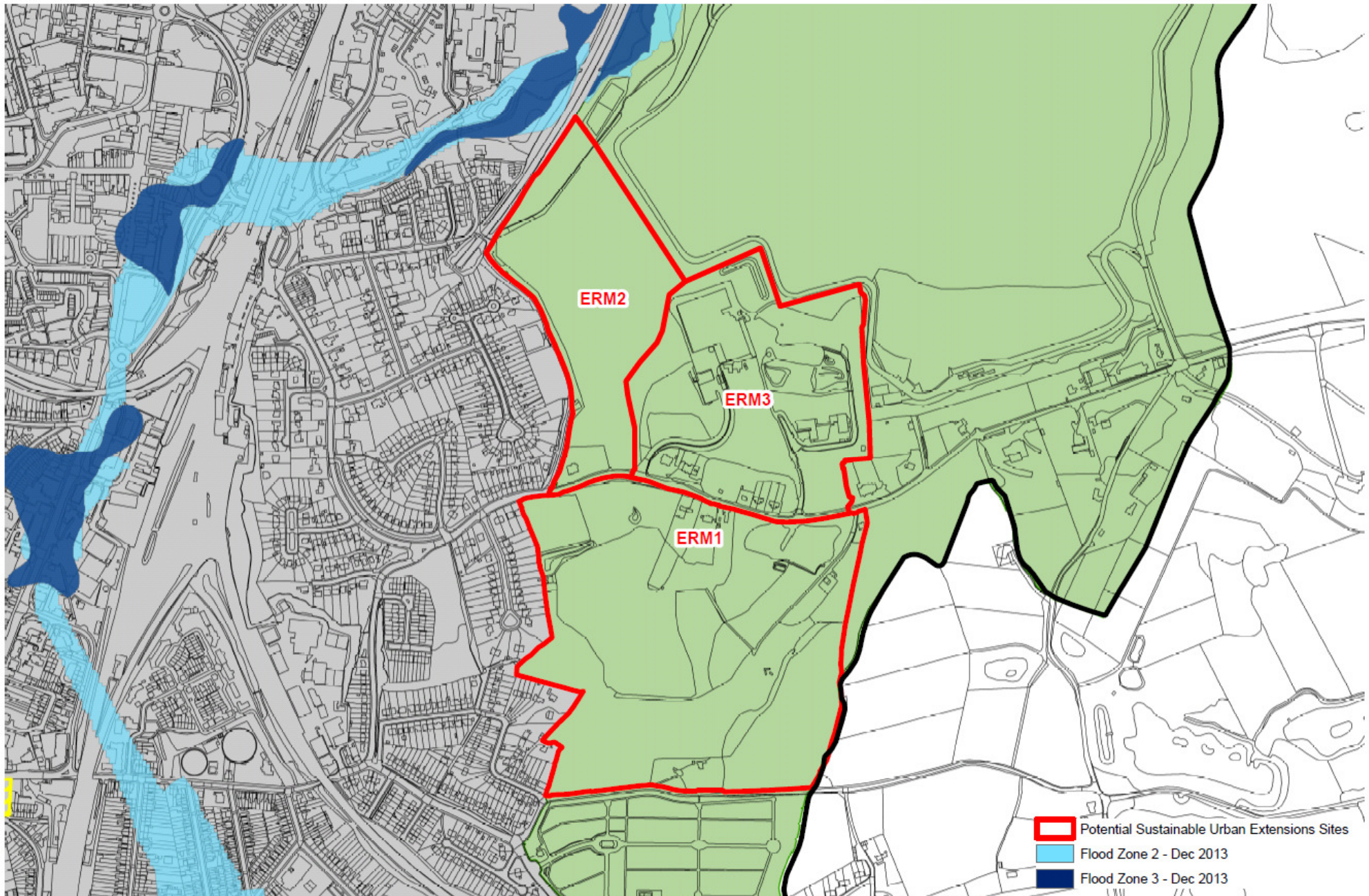
The Environment Agency provided an update of the flood maps in 2013/14, which incorporates the northern part of the site in FZ1.

b) Explain why the proposals cannot be redirected to Flood Zone 1:

| | |
|--|-----|
| | N/A |
|--|-----|

C.3 - Overarching maps

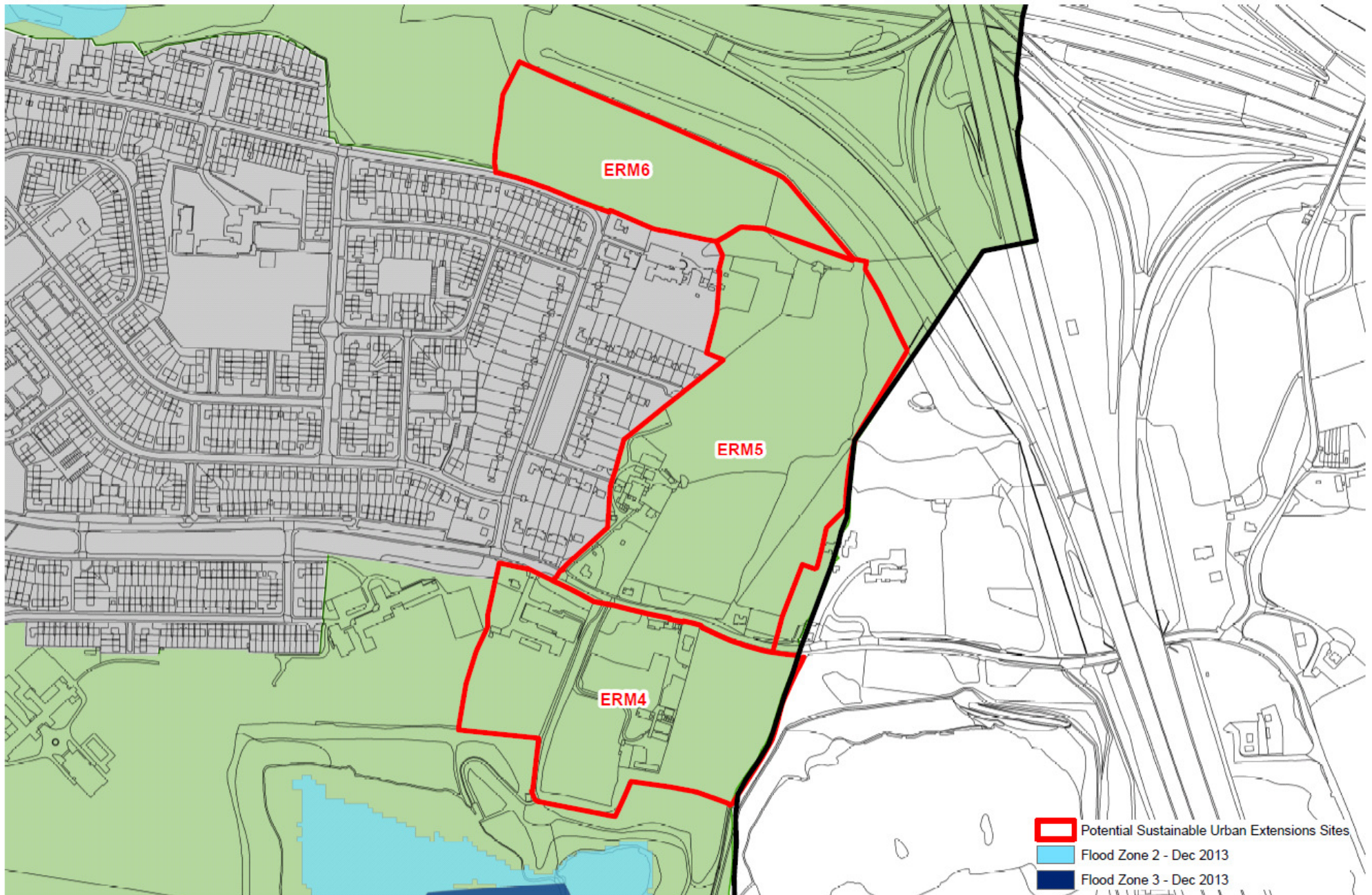
EAST REDHILL



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Identified land parcels are for options analysis and appraisal only and will be subject to public consultation and formal examination.

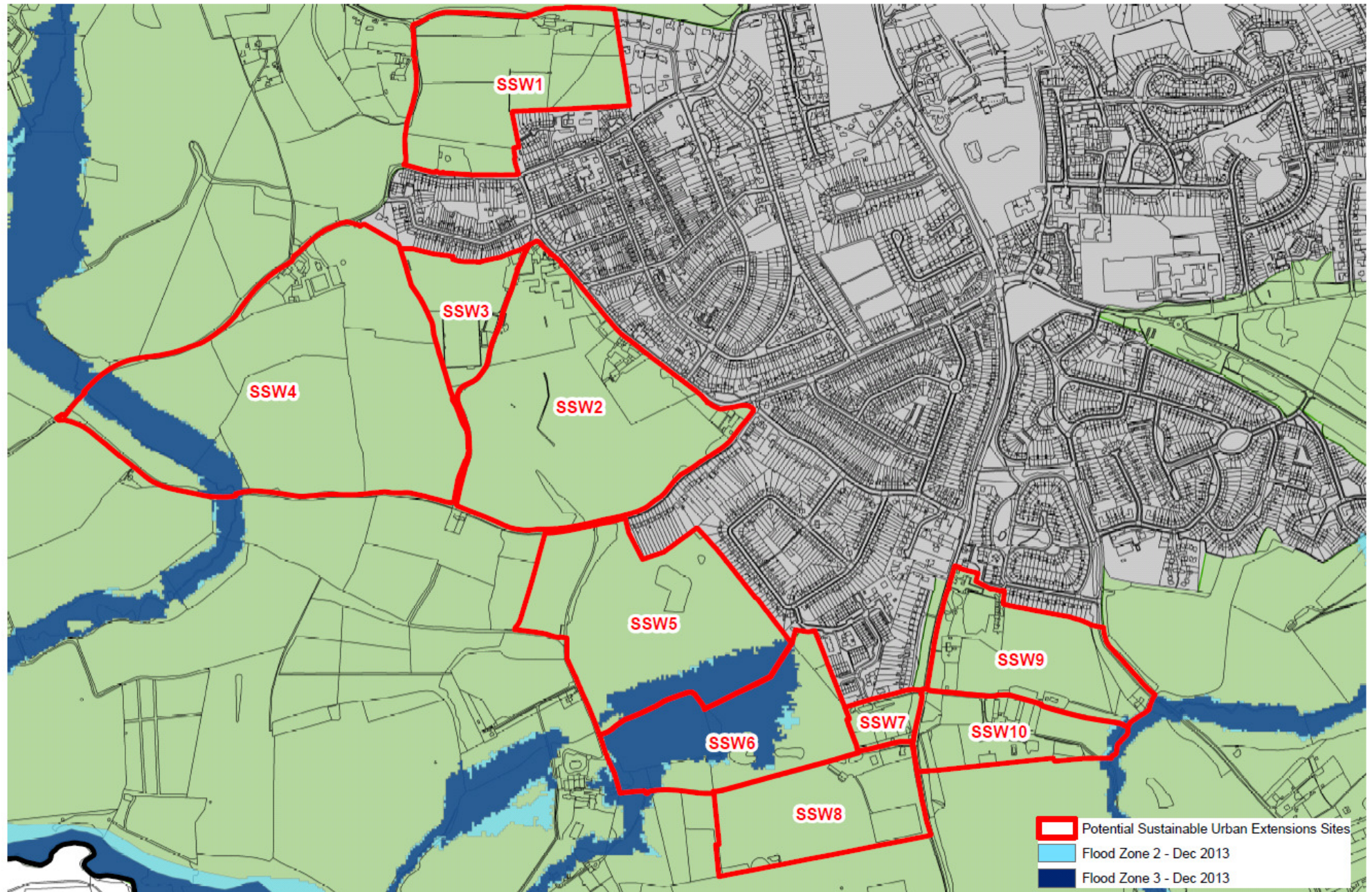
EAST MERSTHAM



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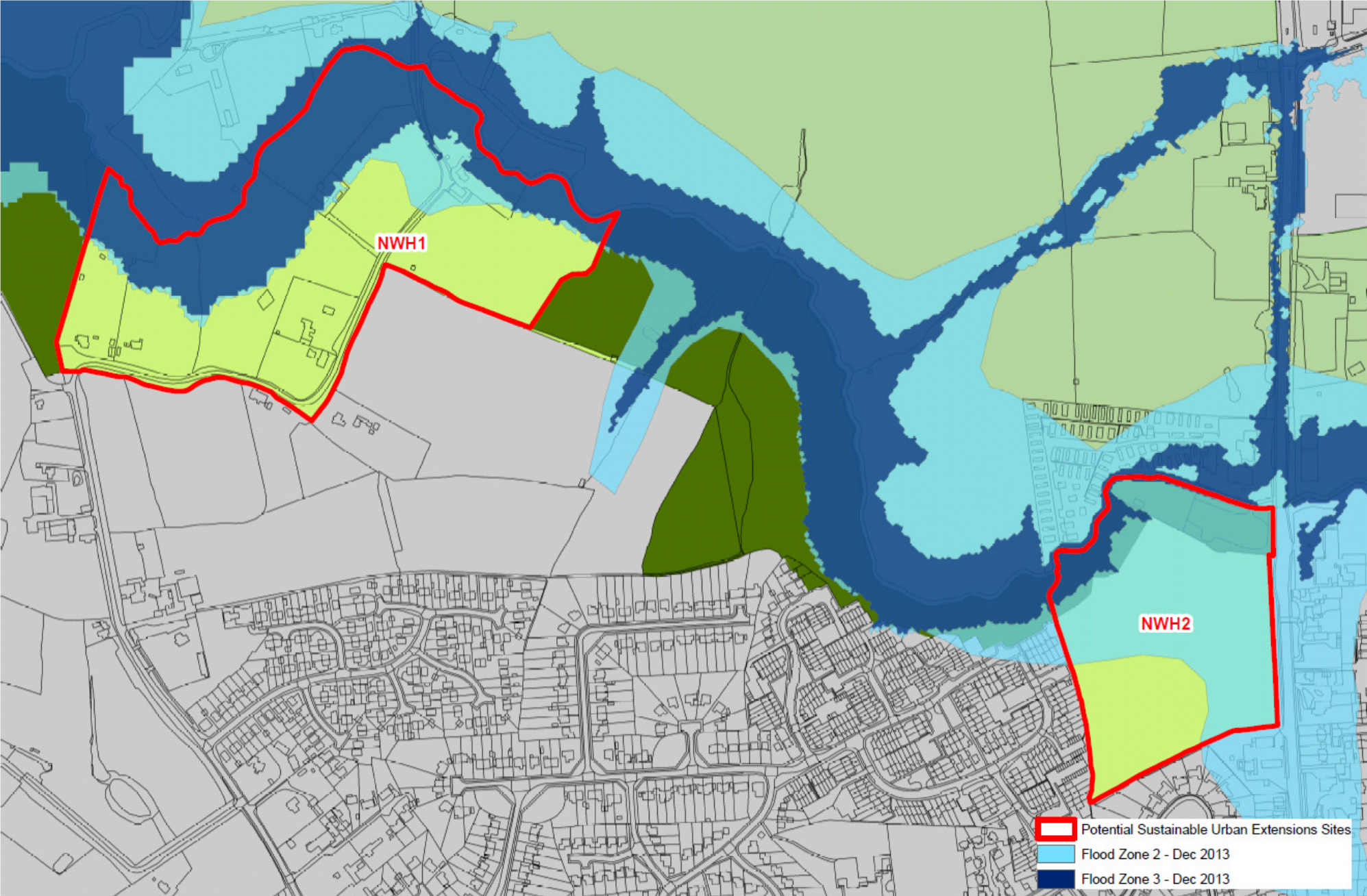
SOUTH REIGATE



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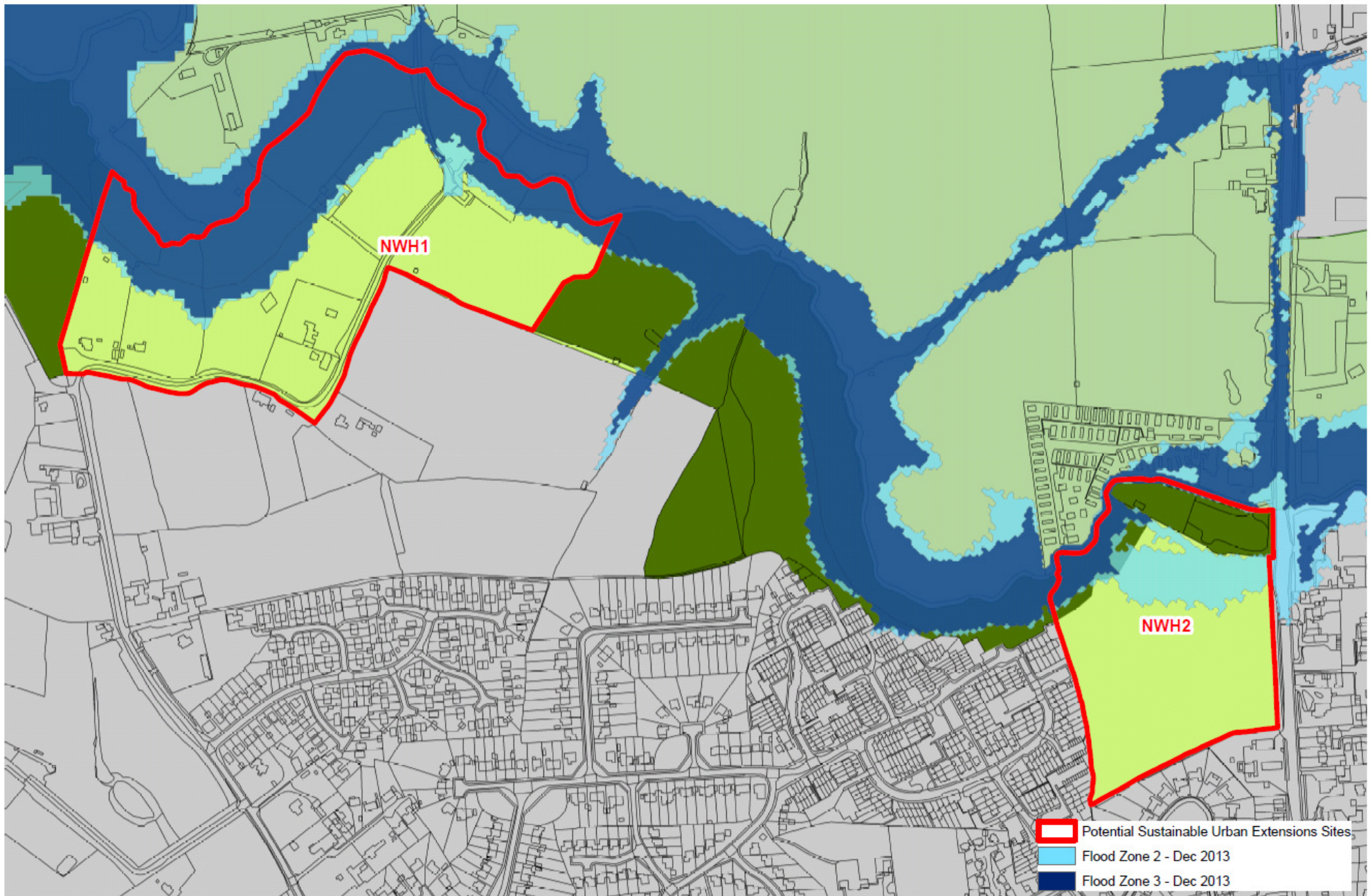
NORTH HORLEY (including historic flood event)



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NORTH HORLEY (excluding historic flood event)

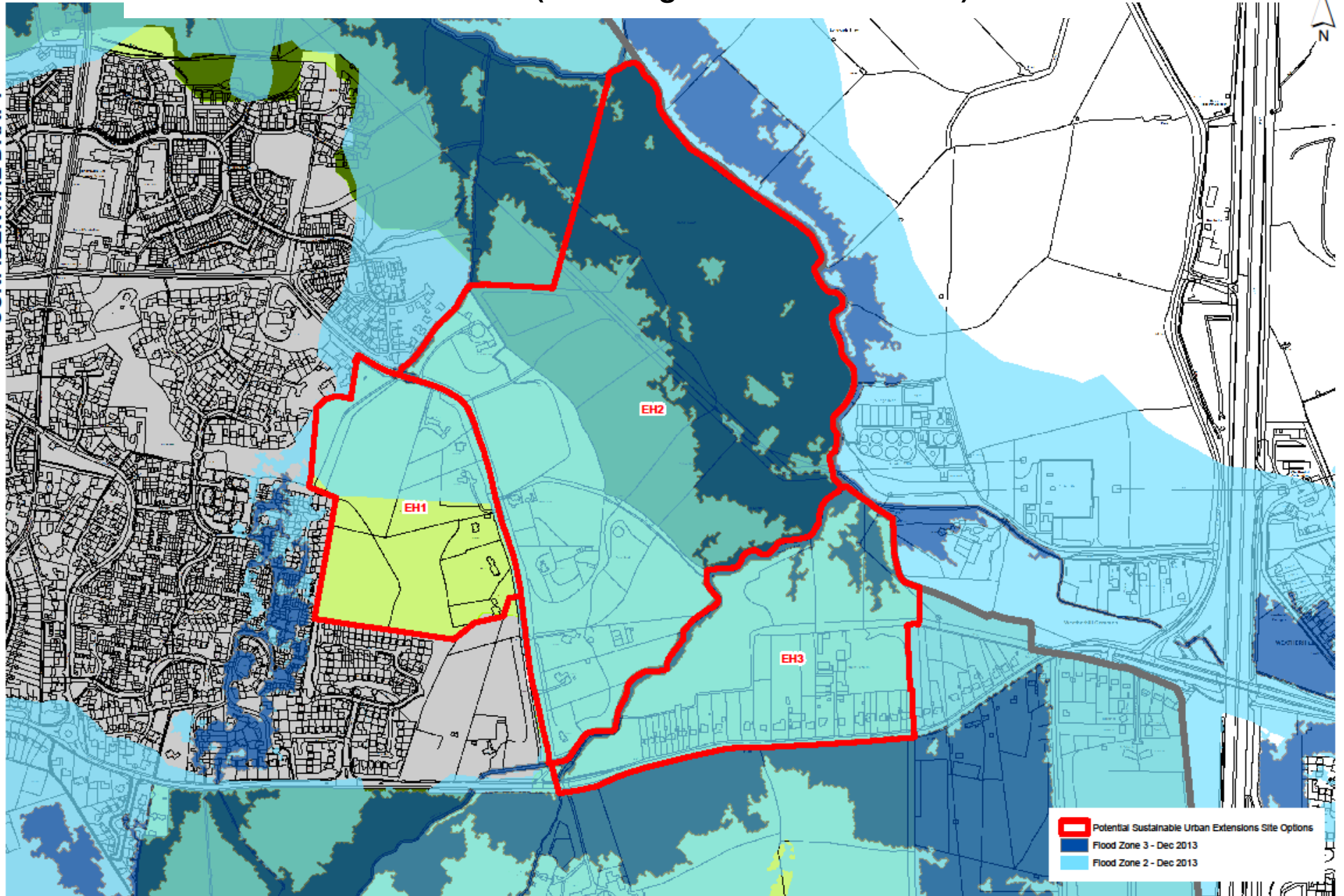


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EAST HORLEY (including historic flood event)

CONFIDENTIAL DRAFT



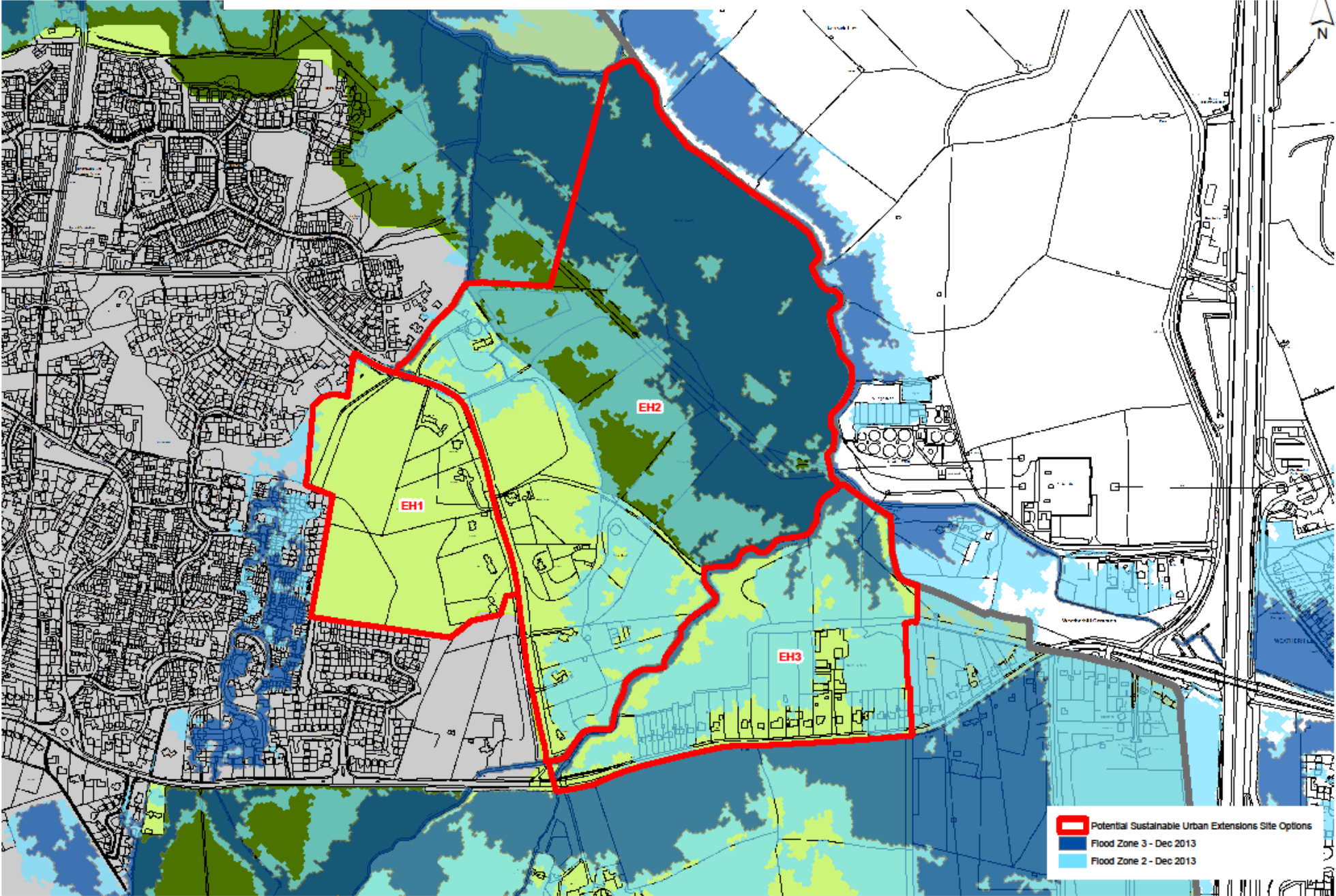
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Scale 1:5,000

EAST HORLEY (Excluding historic flood event)

CONFIDENTIAL DRAFT

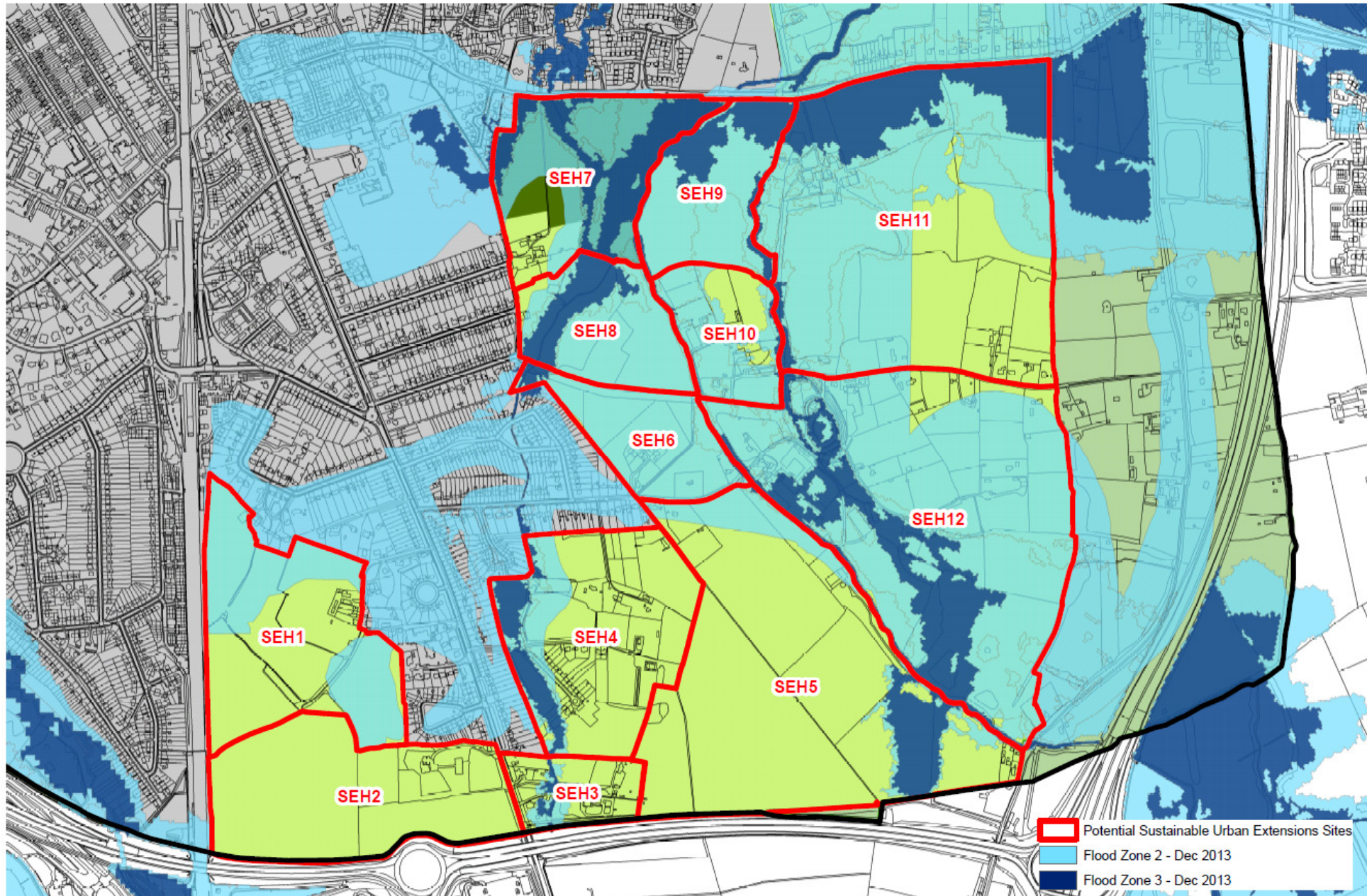


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Scale 1:5,000

SOUTH EAST HORLEY (including historic flood event)



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SOUTH EAST HORLEY (Excluding historic flood event)

