



Development Management Plan (Regulation 18 stage)

Draft Sequential Test for flood risk:

Potential development sites –

- . Town Centre Sites**
- . Urban Housing Sites**
- . Sustainable Urban Extension Sites**
- . Strategic Employment Site**

July 2016

1. BACKGROUND

Introduction

- 1.1 This draft paper summarises the outcomes of Sequential Testing carried out in support of the Development Management Plan Regulation 18 consultation document.
- 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. It assesses the risk of flooding in relation to the following:
- Potential Town Centre development sites
 - Potential Urban Housing sites
 - Potential Sustainable Urban Extension (SUE) sites
 - Potential strategic employment site
- 1.3 Redhill Town centre is excluded from this report as opportunity sites for Redhill have already been sequentially tested as part of work to inform the draft Redhill Town Centre Area Action Plan (consultation draft 2011²).
- 1.4 This report is in the draft stage to support the Development Management Plan Regulation 18 consultation, and will be finalised for the Regulation 19 consultation, at which stage the preferred development site allocations will have been identified.
- 1.5 Should planning applications be submitted for any of the potential 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. Flood mitigation measures could potentially include on-site storage, provision of dry access and egress, or designing a scheme that avoids sensitive uses on the ground floor or avoids the higher risk areas within the site.

National Policy

- 1.6 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,

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

² http://www.reigate-banstead.gov.uk/info/20088/planning_policy/37/redhill_town_centre_area_action_plan

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.

1.7 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:

- 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.

1.8 Flood risk means risk from all sources of flooding – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

1.9 Table 1 shows flood risk vulnerability and Flood Zone ‘compatibility’ as identified in the Technical Guidance to the NPPF.

| 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

- 1.10 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. Climate change issues will be considered in greater detail following the Regulation 18 consultation, when this draft document will be finalised.

Local Policy

- 1.11 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) Preston regeneration area and Banstead village centre in the North Downs area
 - (b) Redhill town centre, Merstham regeneration area and Reigate town centre in the Wealden Greensand Ridge area
 - (c) the two new Horley neighbourhoods and Horley town centre in the Low Weald area.
- 1.12 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.
- 1.13 In line with the objectives and findings from the Core Strategy, potential development sites in the following areas have been identified through work to prepare the Development Management Plan Regulation 18 consultation document:
- Potential Town Centre development sites
 - Potential Urban Housing sites
 - Potential Sustainable Urban Extension (SUE) sites
 - Potential strategic employment site
- 1.14 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 potential development sites for the purposes of consultation.
- 1.15 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 review.

- 1.16 A separate detailed Sequential Testing of sites in Redhill Town Centre has been prepared. 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 have been identified through the draft Redhill Town 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 can be sustainably accommodated. Many of these sites are carried forward into the DMP Regulation 18 consultation document.
- 1.17 As sequential assessment of these individual sites has already been carried out they are not included as part of this document apart from Land at Reading Arch Road/Brighton Road. This site is included in this report due to a change in the potential use identified for the site.

2. METHODOLOGY

The Sequential Test

- 2.1 The aim of this Sequential Test is to steer new development to areas with the lowest probability of flooding, to establish which potential 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.
- 2.2 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.
- 2.3 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

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

higher flood risk land a further test referred to as an Exceptions test must be passed.

- 2.4 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

- 2.5 To pass the Exceptions 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.
- 2.6 Both elements of the test will have to be passed for development to be allocated or permitted.

3. SEQUENTIAL TEST FINDINGS

Potential Town Centre development sites

- 3.1 Table 2 below provides a summary of the Sequential Test for the potential town centre development sites – the full Sequential Test can be found in Appendix A. The Sequential Test was undertaken for the identified potential sites in Banstead, Reigate and Horley town centres as set out in the Regulation 18 DMP consultation document; a Sequential Test for Redhill town centre sites was undertaken previously in support of the Core Strategy and as noted above, potential development sites within Redhill are therefore not included within this assessment. The Environment Agency is exploring potential flood alleviation options to the benefit of Redhill town centre and upon completion the Redhill Town Centre Sequential Test may need to be updated.
- 3.2 The table illustrates that 10 of 11 sites (A, B, D – 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.
- 3.3 One site (Site C - 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 one of the two sites identified in the town centre to deliver retail floorspace to ensure that town centre remains viable and competitive.

- 3.4 The need for retail development in Reigate is supported by the Retail Needs Assessment (RNA) 2016 which identifies the need for around 21,300–22,400sqm of additional comparison retail floorspace to be developed in the borough by 2032 in order to maintain current market share. The RNA identifies that Reigate has the highest comparison sector need in the borough. It recommends (incorporating an adjustment to distribution between Redhill and Reigate taking into account capacity within Reigate), around 2,550sqm of additional comparison floorspace and 400sqm of additional convenience sector floorspace by 2027 in Reigate.
- 3.5 Retail, residential and commercial 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.
- 3.6 Residential development also represents an important part of mixed-use development, having the potential to introduce greater critical mass and vibrancy into town centres. Given its high value, the inclusion of residential is also likely to generate the economic viability required for some sites - particularly on potentially more complex sites - to come forward.
- 3.7 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 achievable, the Exceptions Test would need to be satisfied by the applicant.

Table 2: Sequential Test: summary of town centre potential opportunity sites

| Potential Development Location | Flood Zone1 | Flood Zone 2 | Flood Zone 3 | Proposed Uses | Vulnerability | Sequential Test Passed? |
|----------------------------------|-------------|--------------|--------------|--|-------------------------------------|-------------------------|
| A. 136-168 High Street, Banstead | Yes | No | No | Residential, retail/ community/ leisure | More Vulnerable & Less vulnerable | Yes |
| B. The Horseshoe, Banstead | Yes | No | No | Residential, retail/ community/ leisure/public | Highly Vulnerable More Vulnerable & | Yes |

| | | | | | | |
|---|-----|-------------|-------------|--|-----------------------------------|--|
| | | | | services | Less vulnerable | |
| C. 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 |
| D. Town hall site, Reigate | Yes | No | No | Residential Retail | More Vulnerable & Less vulnerable | Yes |
| E. High Street Car Park, Horley | Yes | No | No | Residential Retail/leisure | More Vulnerable & Less vulnerable | Yes |
| F. 39-49 High Street, Horley | Yes | No | No | Residential Retail/ community | More Vulnerable & Less vulnerable | Yes |
| G. Horley Police Station, Horley | Yes | No | No | Residential | More Vulnerable | Yes |
| H. Royal Mail site, 107 Victoria Road, Horley | Yes | No | No | Residential Retail | More Vulnerable & Less vulnerable | Yes |
| I. Library site, Victoria Road, Horley | Yes | No | No | Residential Community | More Vulnerable & Less vulnerable | Yes |
| J. 50-66 Victoria Road, Horley | Yes | No | No | Residential Retail/leisure | More Vulnerable & Less vulnerable | Yes |
| K. Telephone Exchange site, Horley | Yes | No | No | Residential Community | More Vulnerable & Less vulnerable | Yes |

Urban Housing sites

- 3.8 Table 3 below provides a summary of the Sequential Test for the potential urban housing sites identified in the Regulation 18 DMP consultation document – the full Sequential Test can be found in Appendix B. The table illustrates that nine of twelve sites identified (sites A – C, E, F, H, I, K, L) are

located wholly in Flood Zone 1 and so are sequentially preferable. For these sites, continuation with the Sequential Test is not necessary.

3.9 Parts of sites D, G and J are situated within Flood Zones 2 and 3. For sites D and G development could be directed to parts of the sites that sit in Flood Zone 1.

3.10 For site J, comprehensive development could not be accommodated on Flood Zone 1 solely and most efficient use of this piece of land should be explored to support growth objectives. The Exception Test would need to be carried out if the proposed development aspirations are pursued as this would require the development of 'more vulnerable' uses in Zones 3a.

Table 3: Sequential Test summary of potential urban housing sites

| Potential Development Location | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | Proposed Uses | Vulnerability | Sequential Test Passed? |
|--------------------------------|--------------|--------------|--------------|---------------------------|-----------------|--|
| A. Land at Kingswood station | Yes | No | No | Residential | More Vulnerable | Yes |
| B. Banstead Community Centre | Yes | No | No | Residential Community use | More Vulnerable | Yes |
| C. Quarryside Business Park | Yes | No | No | Residential Community use | More Vulnerable | Yes |
| D. Depot and Bellway House | Yes | Yes, minor | Yes, partly | Residential | More Vulnerable | Yes, development can be directed to areas of lowest risk |
| E. Hockley Business Centre | Yes | No | No | Residential | More Vulnerable | Yes |
| F. Church of Epiphany | Yes | No | No | Residential | More Vulnerable | Yes |
| G. Merstham Library | Yes | Yes, partly | Yes, partly | Residential Community | More Vulnerable | Yes, development can be directed to areas of lowest risk |
| H. Former Oakley Centre | Yes | No | No | Residential | More Vulnerable | Yes |

| | | | | | | |
|--|-----|------------|------------|------------------------|------------------------------------|------------------------------|
| I. Redhill Law Courts | Yes | No | No | Residential Education | More Vulnerable | Yes |
| J. Land at Reading Arch Road/Brighton Road | Yes | Yes, minor | Yes, minor | Residential Retail | More Vulnerable Less Vulnerable | No – Exception Test required |
| K. Albert Road North Industrial Estate | Yes | No | No | Residential Employment | More Vulnerable Less Vulnerable | Yes |
| L. Former Chequers Hotel | Yes | No | No | Residential | More Vulnerable | Yes |

Potential reserve Sustainable Urban Extensions

- 3.11 Table 4 below provides a summary of the Sequential Test for the full range of sustainable urban extension sites tested and the potential strategic employment site - the full Sequential Test can be found in Appendix C. 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. In the event that these sites are considered for allocation there would be no need to proceed further with the Sequential Test.
- 3.12 There are also fourteen sites (Site 10 – 12, 17 – 19, 22, 24 – 26, 28, 31 – 33) 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 in the event that they were considered for allocation (subject to design restricting development to Flood Zone 1).
- 3.13 The remaining five sites (Site 20 – 21, 27, 29 – 30) have no areas of Flood Zone 1 or areas of Flood Zone 1 that are too small to accommodate development. Should the site selection and Regulation 18 consultation process reveal that it is not possible to achieve the required amount of development (as set out in the Core Strategy) from the more sequentially preferable sites (e.g. due to site specific issues or delivery constraints), then these sites may need to be considered.

Potential Strategic Employment Site

- 3.14 The two land parcels (Sites 22 and 23) identified as part of the potential 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 so 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 potential reserve sites for development outside existing urban areas

| | Potential Development Location | Flood Zone 1 | Flood Zone 2 | Flood Zone 3 | Proposed Uses | Vulnerability | Sequential Test Passed? |
|----|--------------------------------|--------------|--------------|--------------------|---------------|-----------------|--|
| 1 | East Redhill – ERM1 | Yes | No | No | Residential | More Vulnerable | Yes |
| 2 | East Redhill – ERM2 | Yes | No | No | Residential | More Vulnerable | Yes |
| 3 | East Redhill – ERM3 | Yes | No | No | Residential | More Vulnerable | Yes |
| 4 | East Merstham – ERM4 | Yes | No | No | Residential | More Vulnerable | Yes |
| 5 | East Merstham – ERM5 | Yes | No | No | Residential | More Vulnerable | Yes |
| 6 | East Merstham – ERM6 | Yes | No | No | Residential | More Vulnerable | Yes |
| 7 | South Reigate – SSW1 | Yes | No | No | Residential | More Vulnerable | Yes |
| 8 | South Reigate – SSW2 | Yes | No | No | Residential | More Vulnerable | Yes |
| 9 | South Reigate – SSW3 | Yes | No | No | Residential | More Vulnerable | Yes |
| 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 |

| | | | | | | | |
|----|--|-----|--------------------|-------------|-------------|-----------------|---|
| 14 | South Reigate – SSW8 | Yes | No | No | Residential | More Vulnerable | Yes |
| 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 (Potential strategic Employment Site) | Yes | Yes, partly | No | Office | Less Vulnerable | Yes – development can be directed to FZ1 only. |
| 23 | South East Horley – SEH2 (Potential strategic Employment Site) | Yes | No | No | Office | Less Vulnerable | Yes |

| | | | | | | | |
|-----------|---------------------------|-----|--------------------|-------------|-------------|-----------------|---|
| 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 | Yes – development can be directed to FZ1 only. |

4. APPENDICES

Appendix A:

Town Centre potential development sites (excluding Redhill Town Centre)

A.1 - Summary table

| Site Ref. | Site Name | Location | Flood Zone (%) | | | Potential Proposed Uses | Vulnerability | Sequential Test Passed? |
|-----------|------------------------------------|----------|----------------|-----|-----|---|--|--|
| | | | FZ1 | FZ2 | FZ3 | | | |
| A. | 136-168 High Street | Banstead | 100 | 0 | 0 | Residential, retail/community/leisure | More Vulnerable & Less vulnerable | Yes |
| B. | The Horseshoe | Banstead | 100 | 0 | 0 | Residential, retail/community/leisure/public services | Highly Vulnerable More Vulnerable & Less vulnerable | Yes |
| C. | Library and Pool House | Reigate | 63 | 23 | 14 | Residential Retail/commercial/leisure/community | More Vulnerable & Less vulnerable | Yes, development can be directed to areas of lowest risk |
| D. | Town hall site | Reigate | 100 | 0 | 0 | Residential Retail | More Vulnerable & Less vulnerable | Yes |
| E. | High Street Car Park | Horley | 100 | 0 | 0 | Residential Retail/leisure | More Vulnerable & Less vulnerable | Yes |
| F. | 39-49 High Street | Horley | 100 | 0 | 0 | Residential Retail/community | More Vulnerable & Less vulnerable | Yes |
| G. | Horley Police Station | Horley | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| H. | Royal Mail site, 107 Victoria Road | Horley | 100 | 0 | 0 | Residential Retail | More Vulnerable & Less vulnerable | Yes |
| I. | Library site, Kings Road | Horley | 100 | 0 | 0 | Residential Community | More Vulnerable & Less vulnerable | Yes |
| J. | 50-66 Victoria Road | Horley | 100 | 0 | 0 | Residential Retail/leisure | More Vulnerable & Less vulnerable | Yes |
| K. | Telephone Exchange site | Horley | 100 | 0 | 0 | Residential Community | More Vulnerable & Less vulnerable | Yes |

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.

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 • Town Hall site, Castlefield Road, Reigate • High Street Car Park, Horley • 39-49 High Street, Horley • Horley Police Station, Massetts Road, Horley • Royal Mail site, 107 Victoria 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 FZ3 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 will be reflected in the DMP. Each of the town centres is unique in character and role. Reigate town centre is one</p> |

| | |
|--|---|
| | <p>of 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.</p> <p>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.</p> <p>b) Identify alternative sites that were considered and explain why they were dismissed</p> <p>Apart from REI2 Town Hall site 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 can be accommodated on these two sites alone.</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. | |
| a. Proposed uses for the entire site: | |
| | <p><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.</p> |
| 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 | <p>List the proposed uses in these classifications:</p> <p><u>Library and Pool House, Bancroft Road, Reigate:</u> <i>More Vulnerable:</i> 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)</p> <p><i>Less Vulnerable:</i> Retail (shops), commercial (offices) and leisure</p> <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 Zone 3.</i></p> |
| 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> |
| <p>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?</p> | |
| Yes | <p>Identify how the risks have been reduced:</p> <p>N/A: no highly vulnerable uses proposed</p> |
| No | <p>Explain why the development types cannot be relocated:</p> <p>N/A: no highly vulnerable uses proposed</p> |

| | |
|--|-----|
| <p>4. For sites in 'Zone 3a High Probability and Zone 3b Functional Flood Plain' of flood risk.</p> | |
| <p>a. Proposed uses for the entire site:</p> | |
| <p><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.</p> | |
| <p>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:</p> | |
| 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 there is only one other site (which is constrained itself) identified as having potential for any type of development in Reigate town centre. 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> |
| <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</p> | |
| 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> |
| <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>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>Should some development in FZ3 be required (i.e. for viability or due to layout constraints) it may be pertinent to consider replicating the existing footprint of the built form currently on site which sits within FZ3. With appropriate mitigation this could mean that the flood extent remains unchanged. Access to the residential units above could then be provided from FZ1 and FZ2 areas of</p> |

| | |
|--|---|
| | <p>the site.</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 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></p> |
| 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 there is only one other site (which is constrained itself) identified as having potential for any type of development in Reigate town centre. 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> |
| 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 | <p>Identify how the risks could be reduced:</p> <p>N/A: no highly vulnerable development types proposed</p> |
| No | N/A: no highly vulnerable development types proposed |

A.3 – Maps

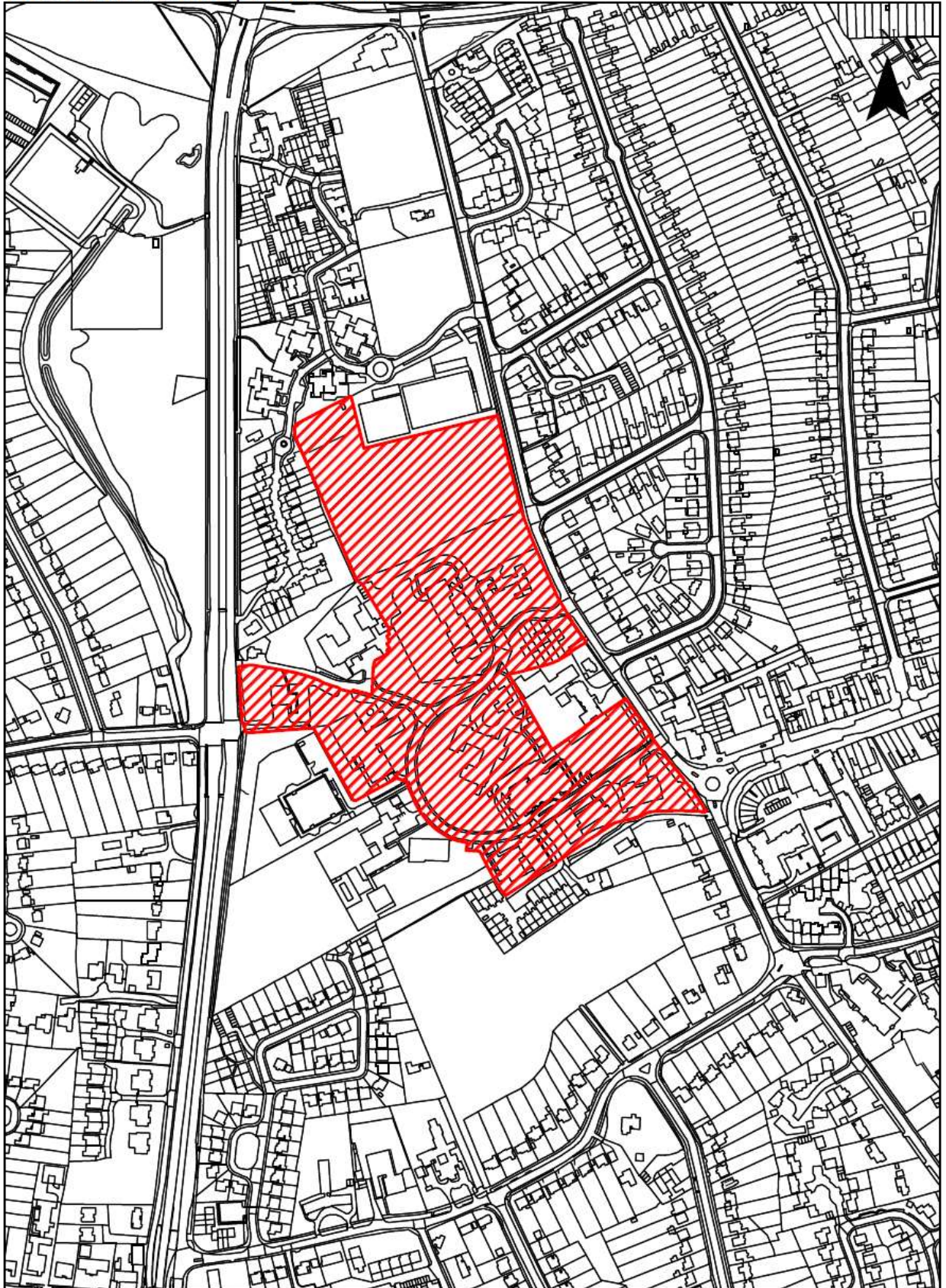
Banstead Town Centre potential development site 136 – 168 High Street, Banstead



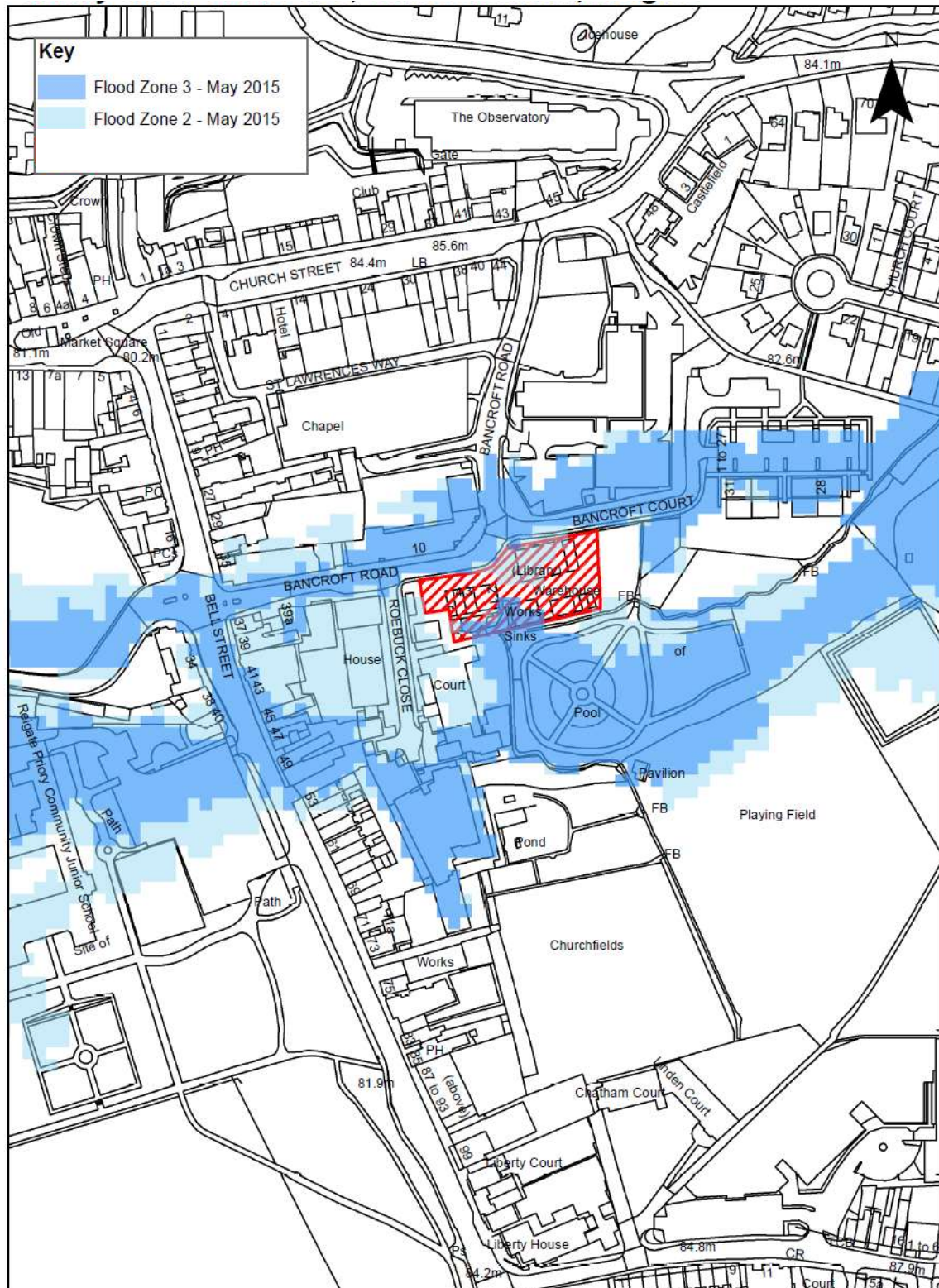
Crown Copyright Reserved. Reigate & Banstead Borough Council Licence No. 100019405

Scale 1:3,000

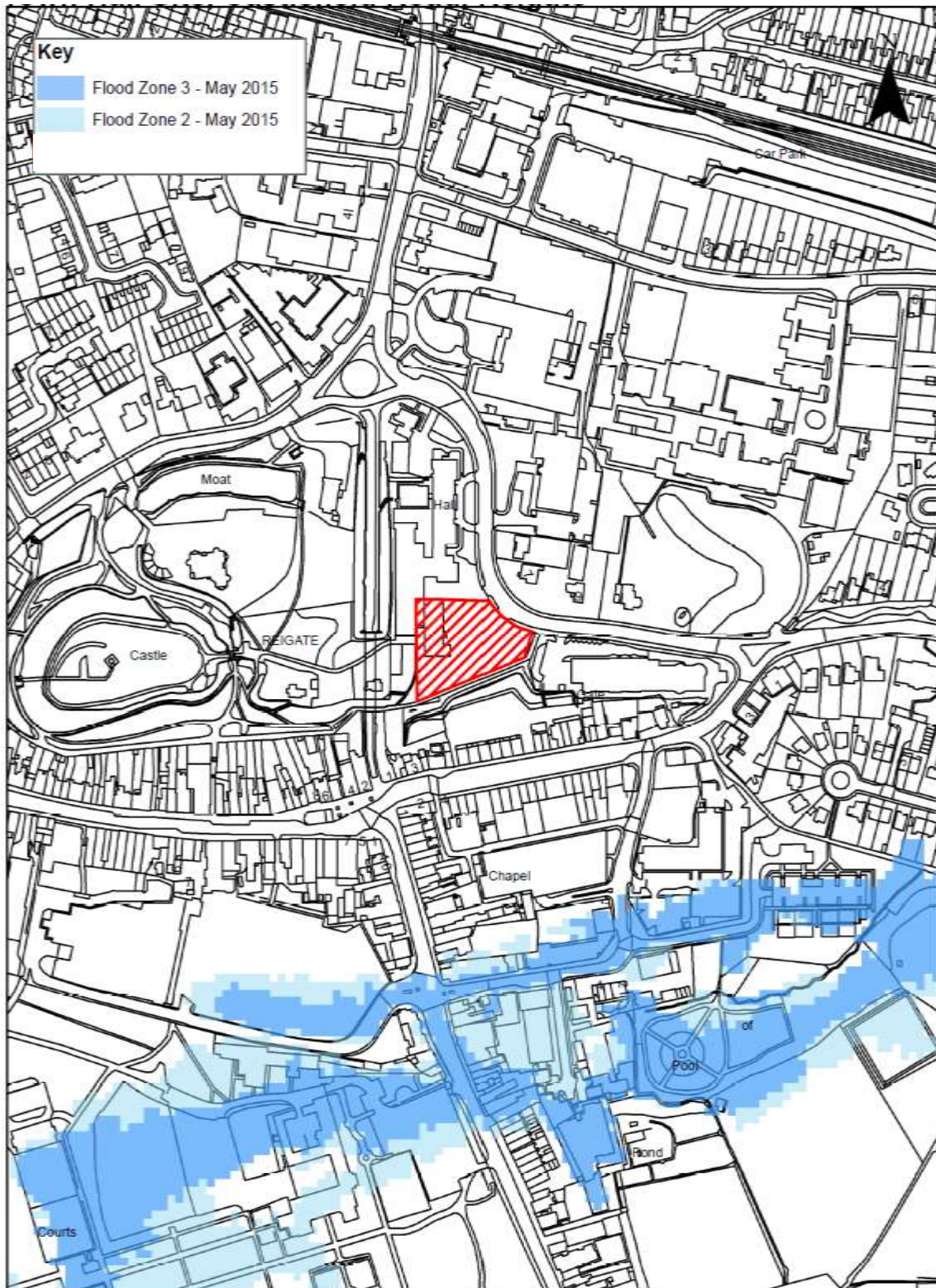
Banstead Town Centre potential development site
The Horse Shoe, Banstead



Reigate Town Centre potential development site Library and Pool House, Bancroft Road, Reigate



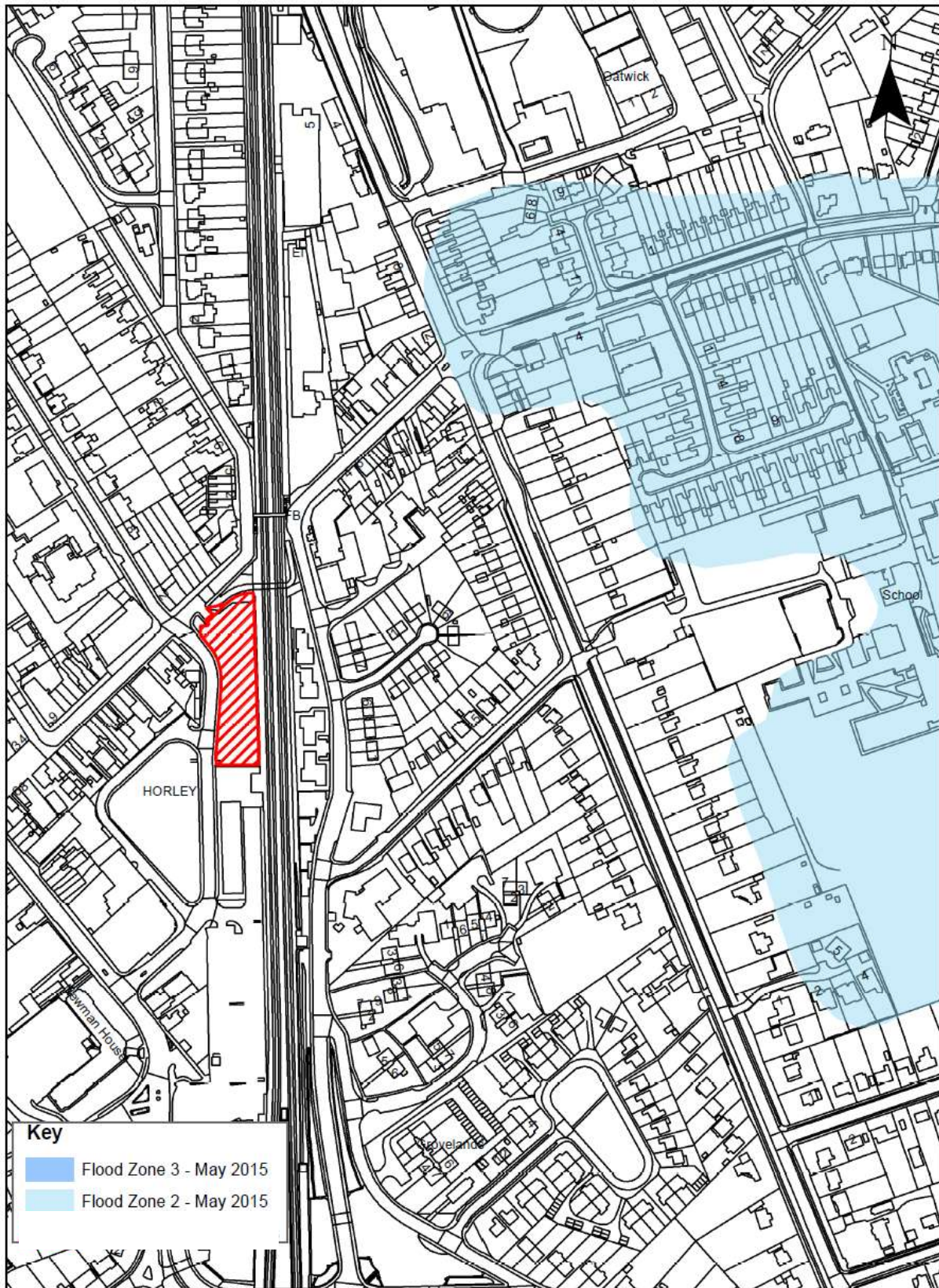
Reigate Town Centre potential development site
Town Hall Site, Castlefield Road, Reigate



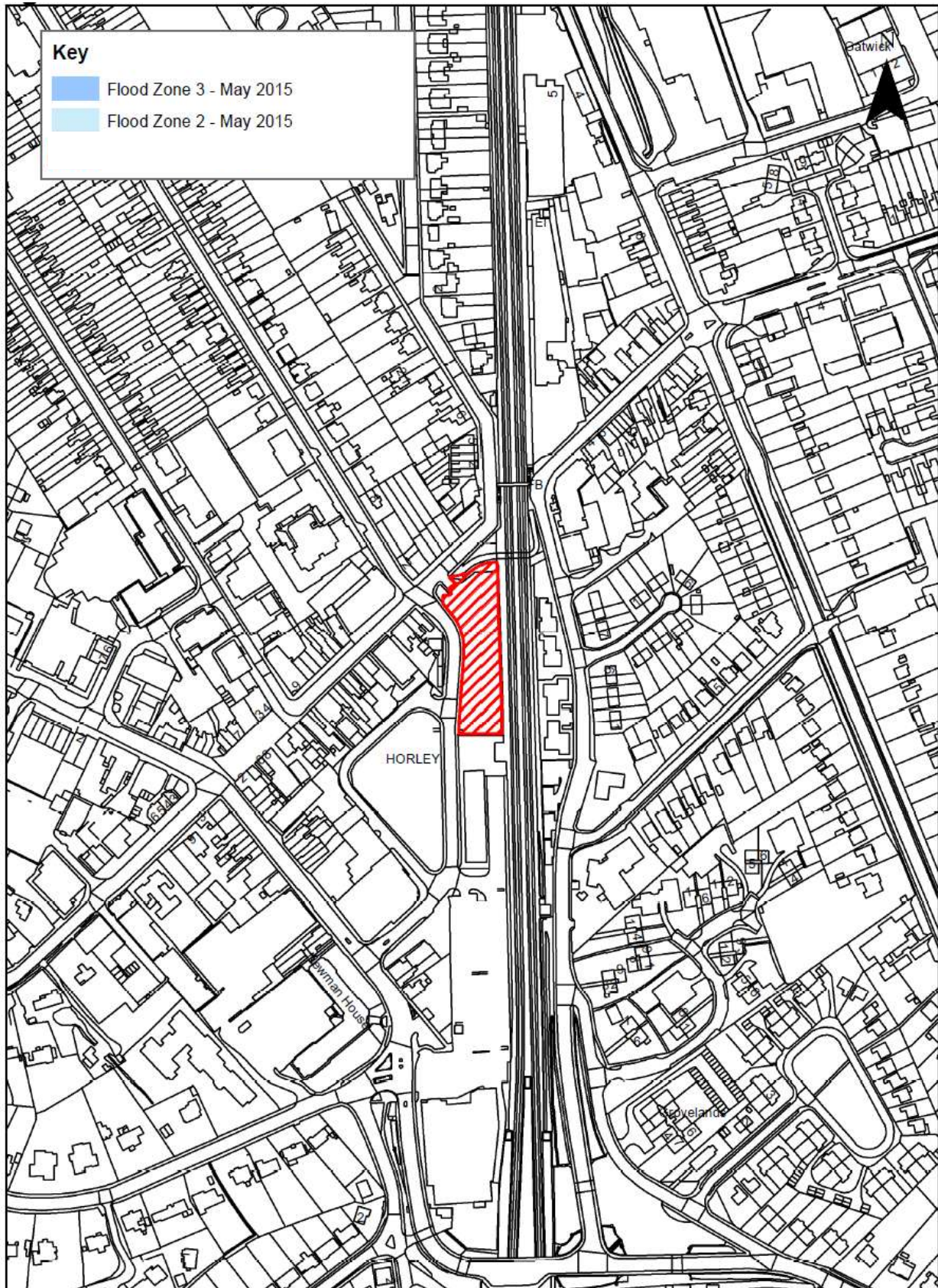
Crown Copyright Reserved. Reigate & Banstead Borough Council Licence No. 100019405

Scale 1:3,000

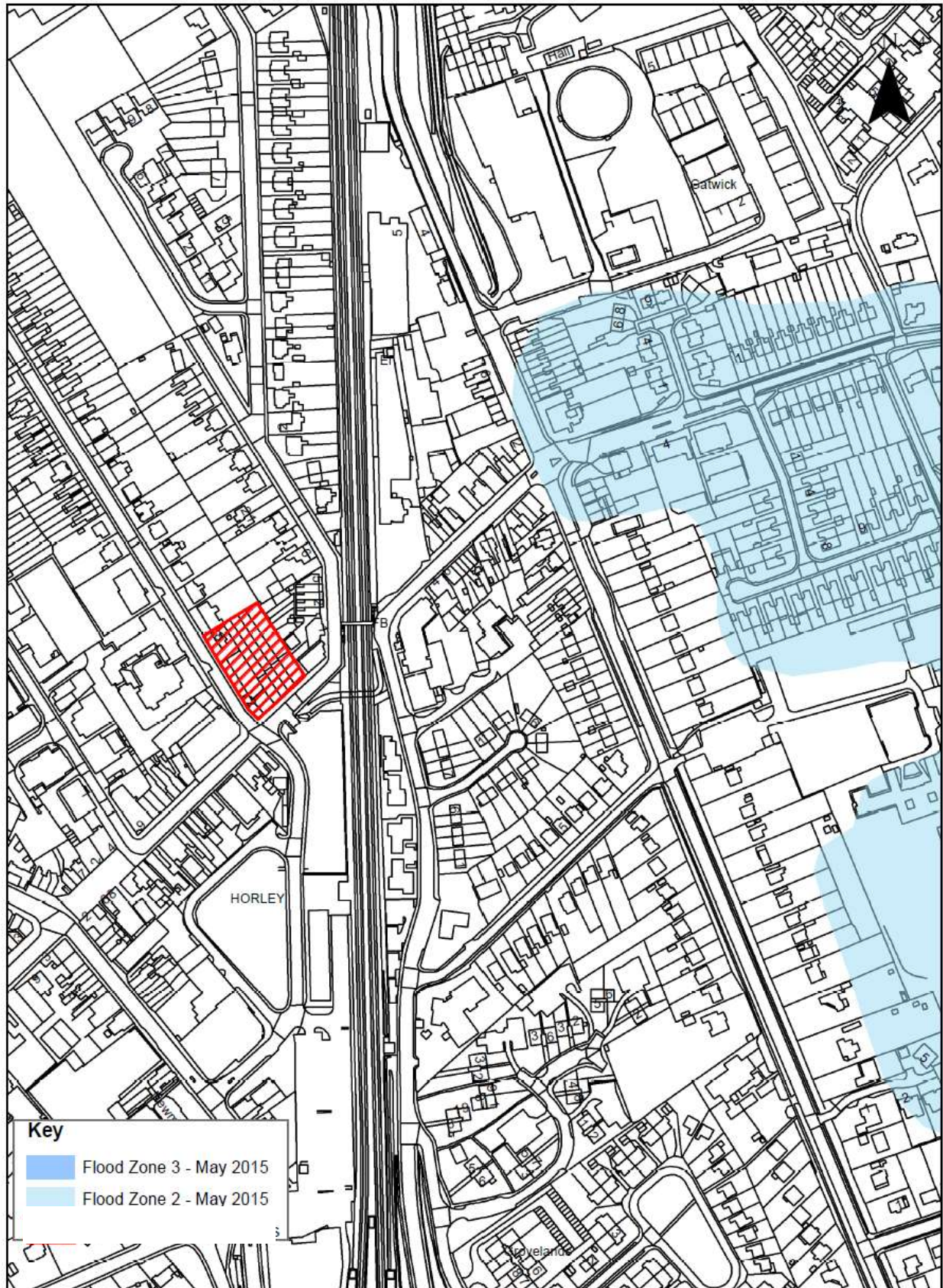
**Horley Town Centre potential development site
High Street Car Park, Horley (Historic Flood Map)**



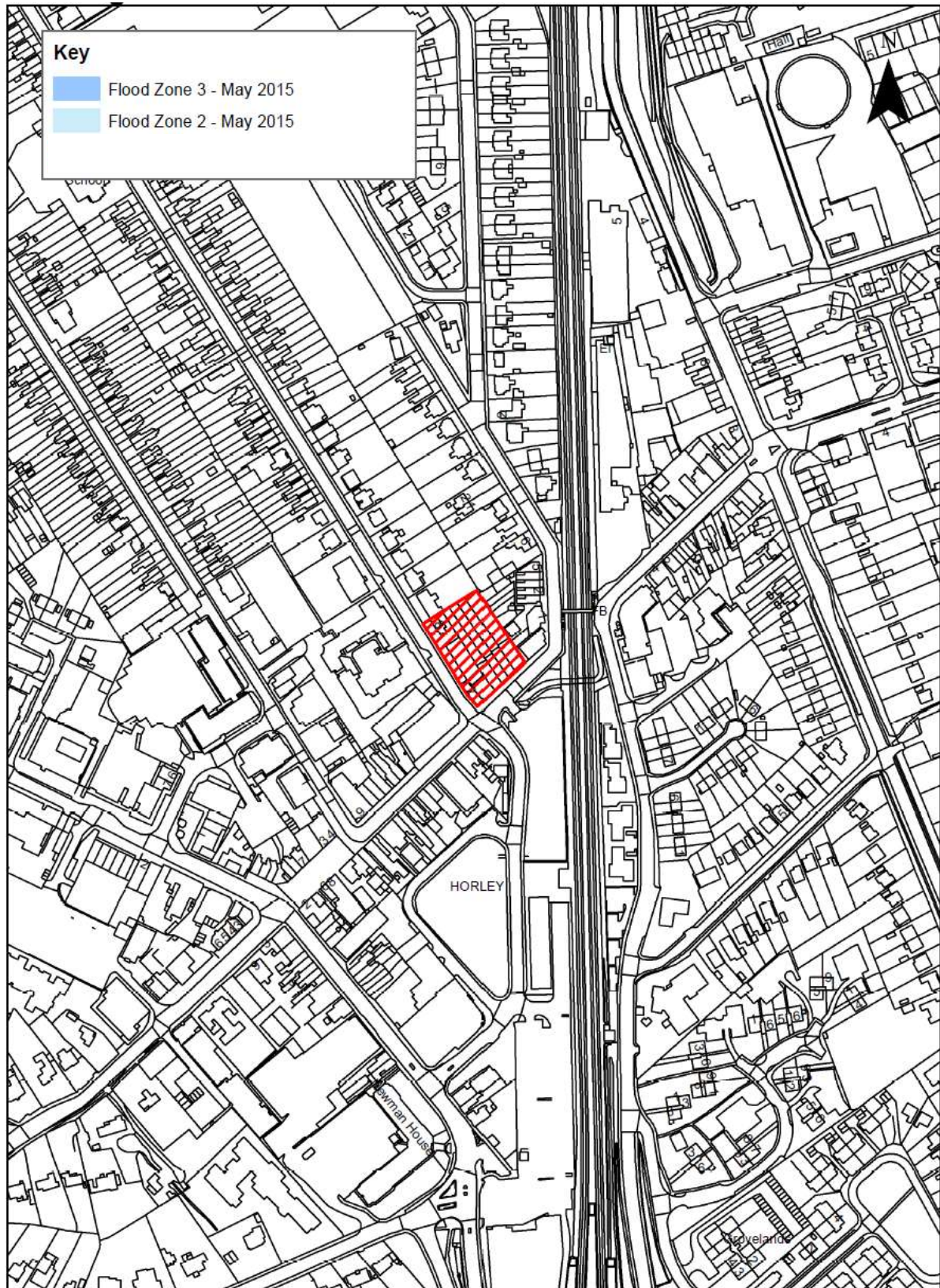
**Horley Town Centre potential development site
High Street Car Park, Horley (Model Flood Map)**



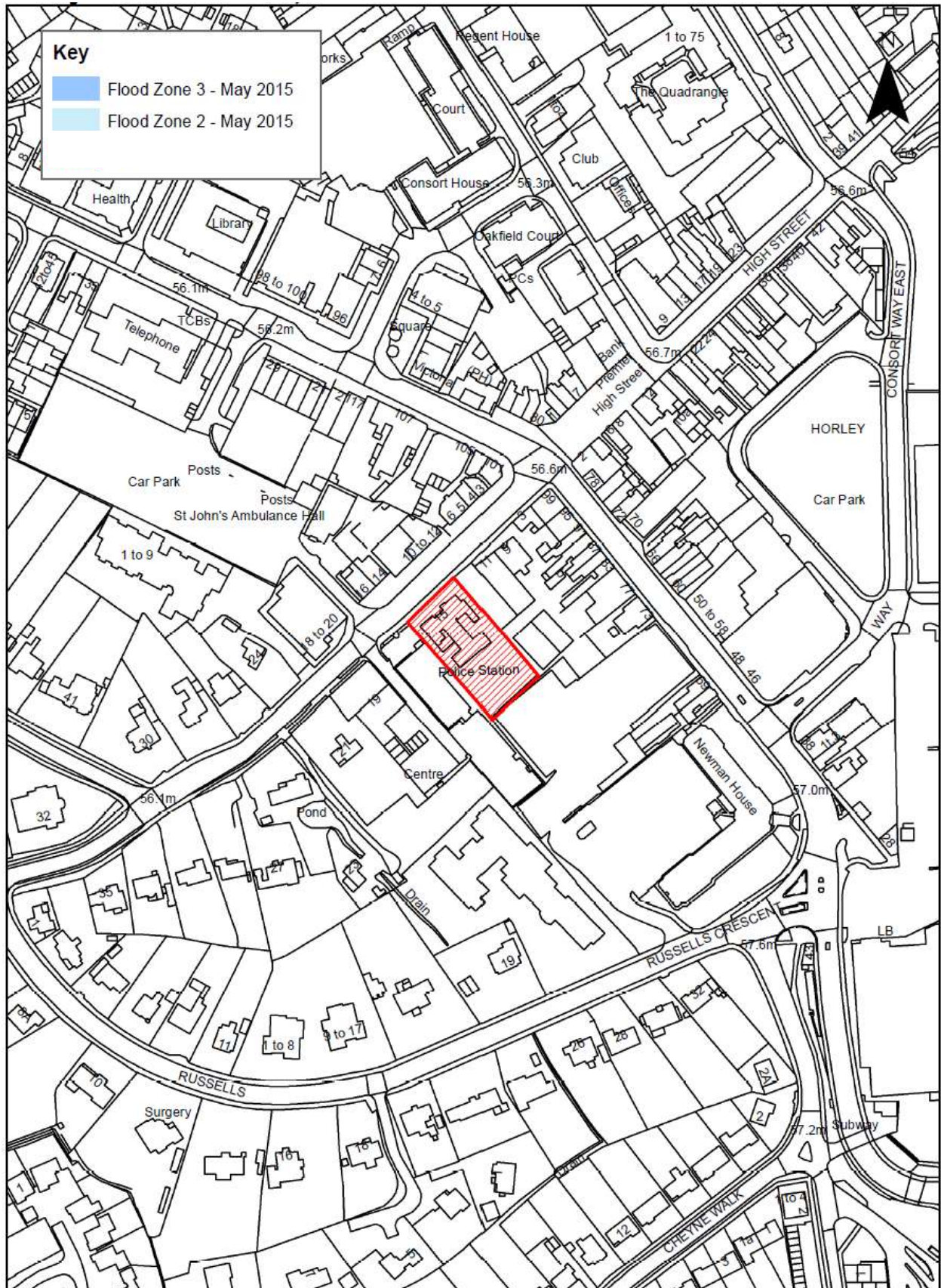
**Horley Town Centre potential development site
39-49 High Street, Horley (Historic Flood Map)**



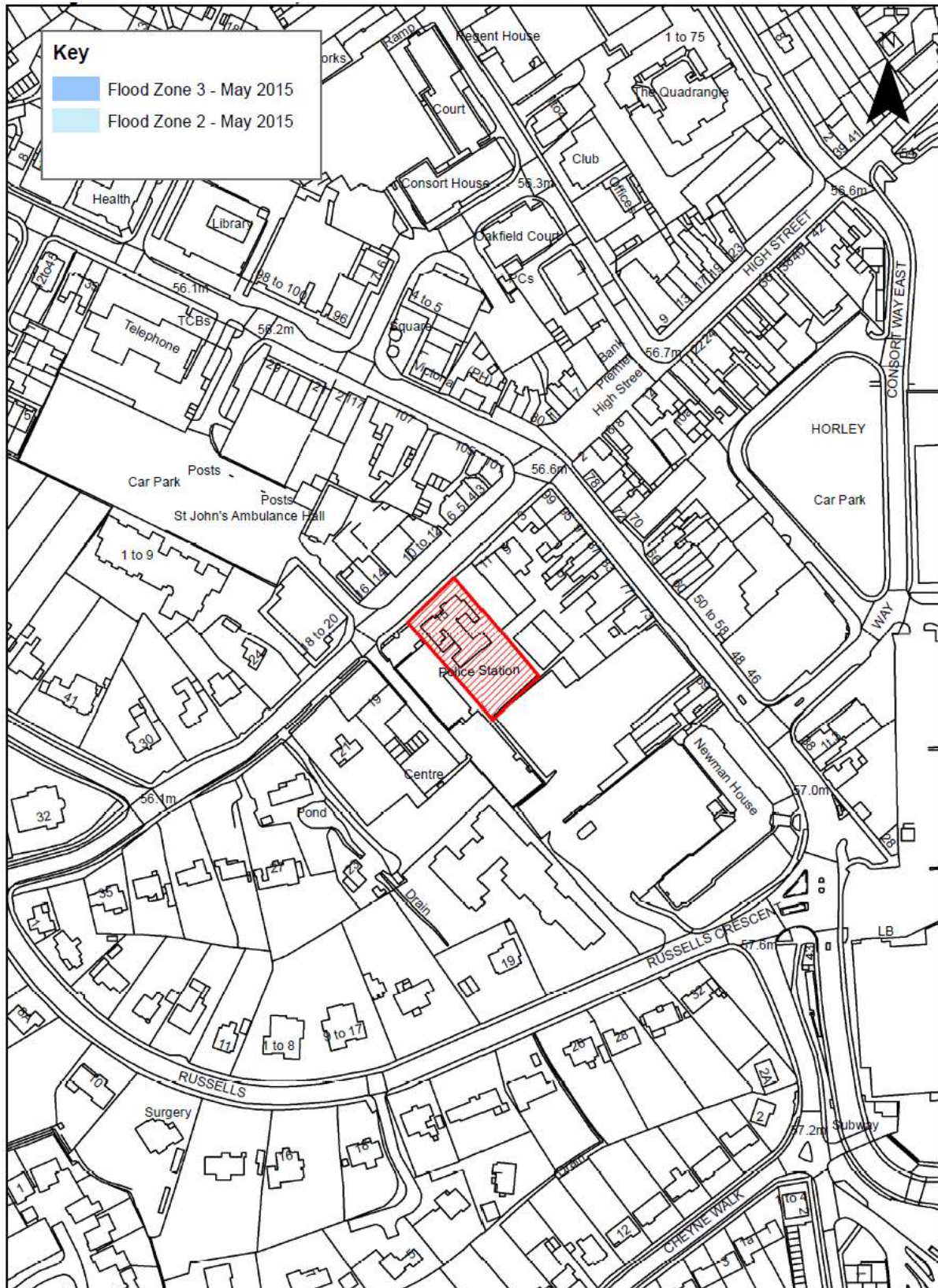
**Horley Town Centre potential development site
39-49 High Street, Horley (Model Flood Map)**



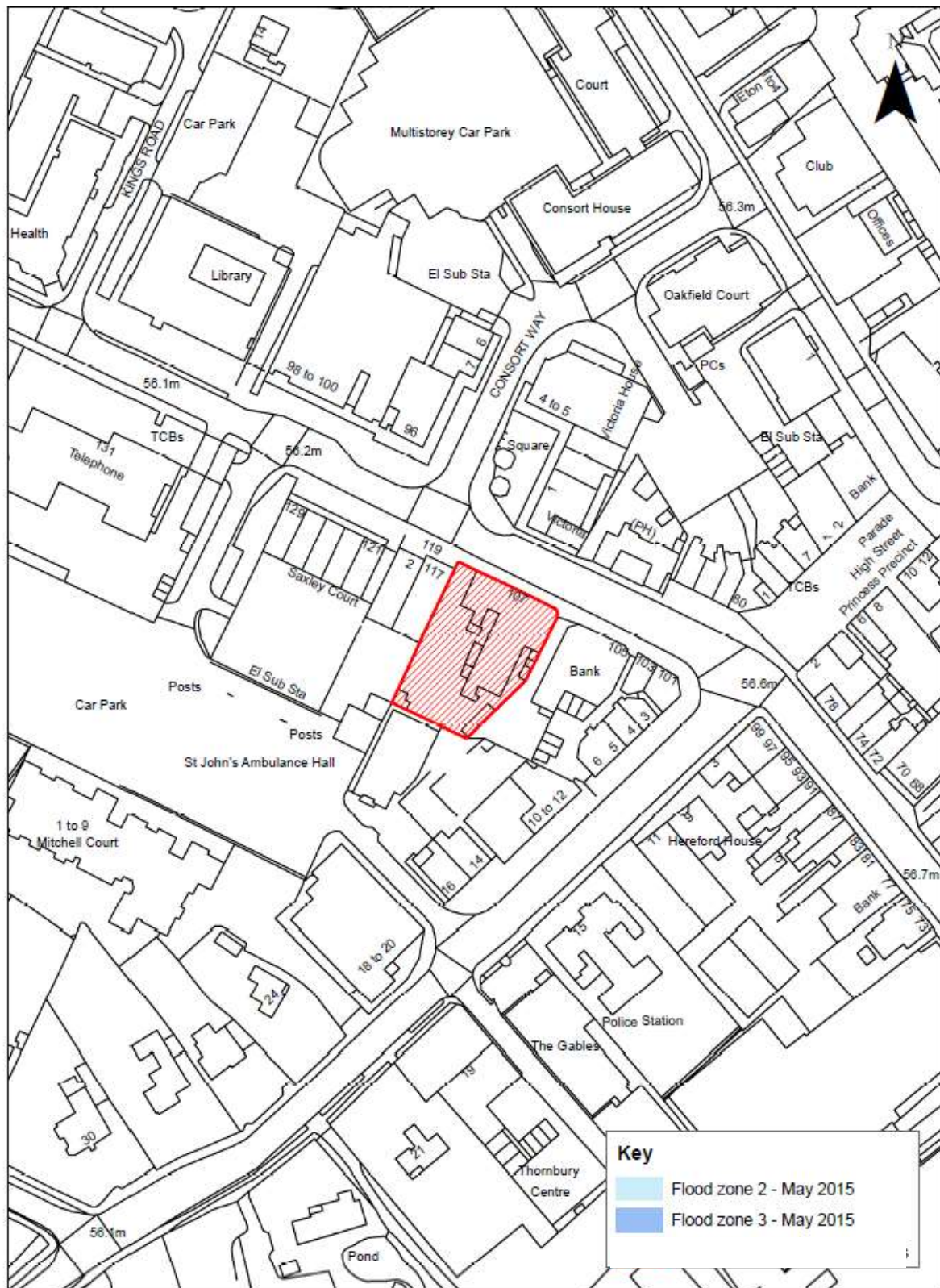
Horley Town Centre potential development site Horley Police Station, Massetts Road, Horley (Historic Flood Map)



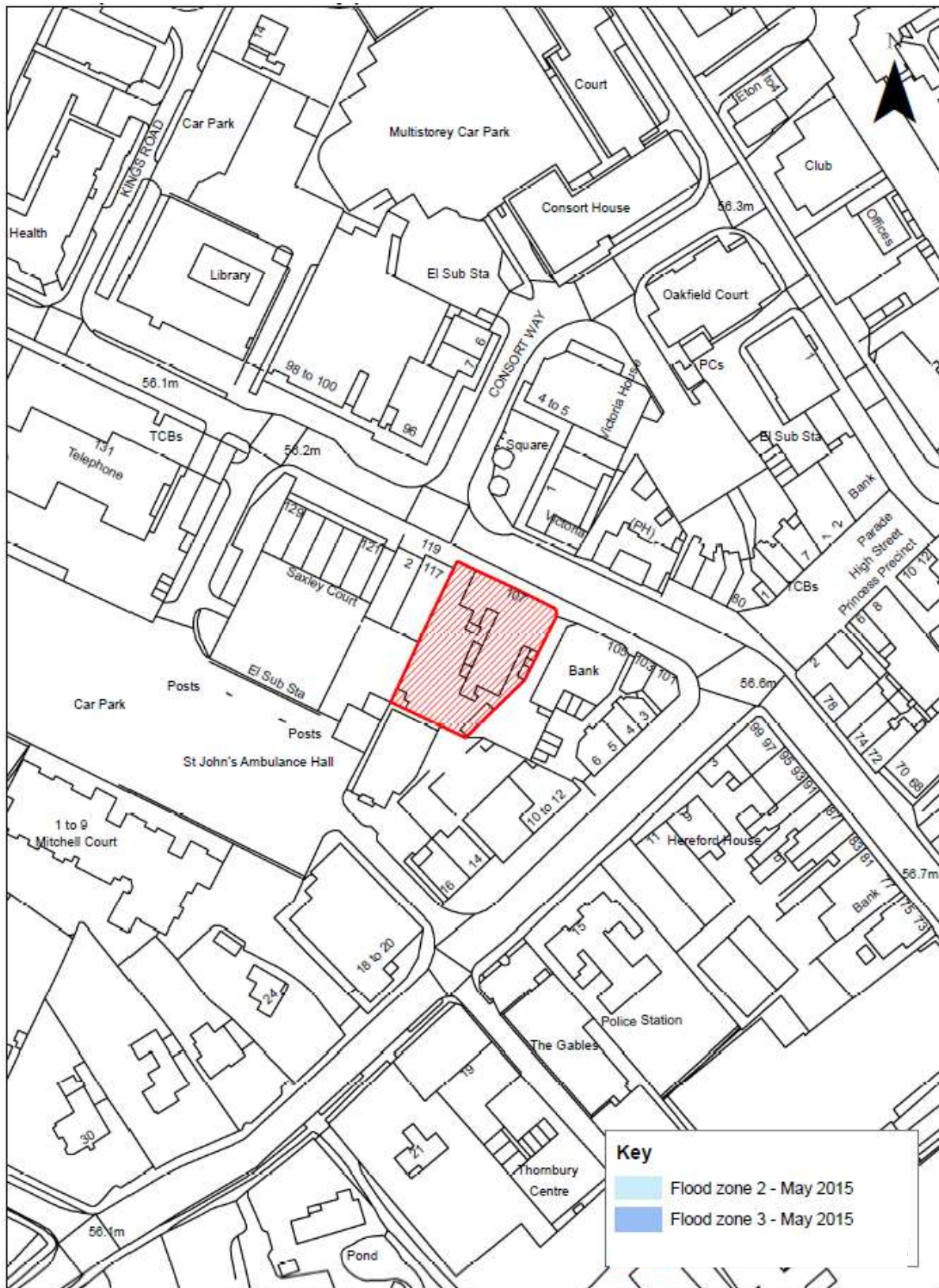
Horley Town Centre potential development site **Horley Police Station, Massetts Road, Horley (Model Flood Map)**



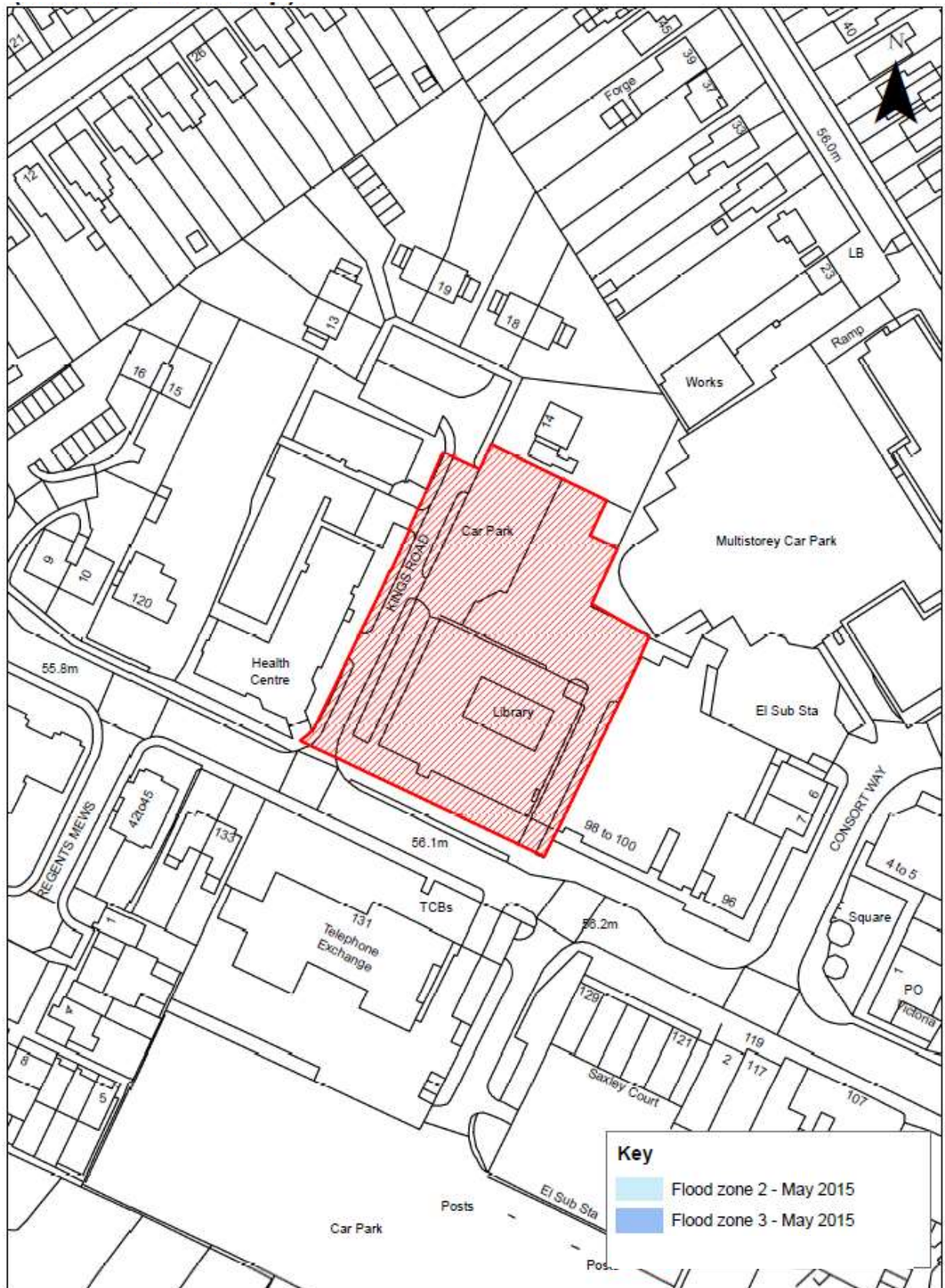
Horley Town Centre potential development site
Royal Mail Site, 107 Victoria Road (Historic flood map)



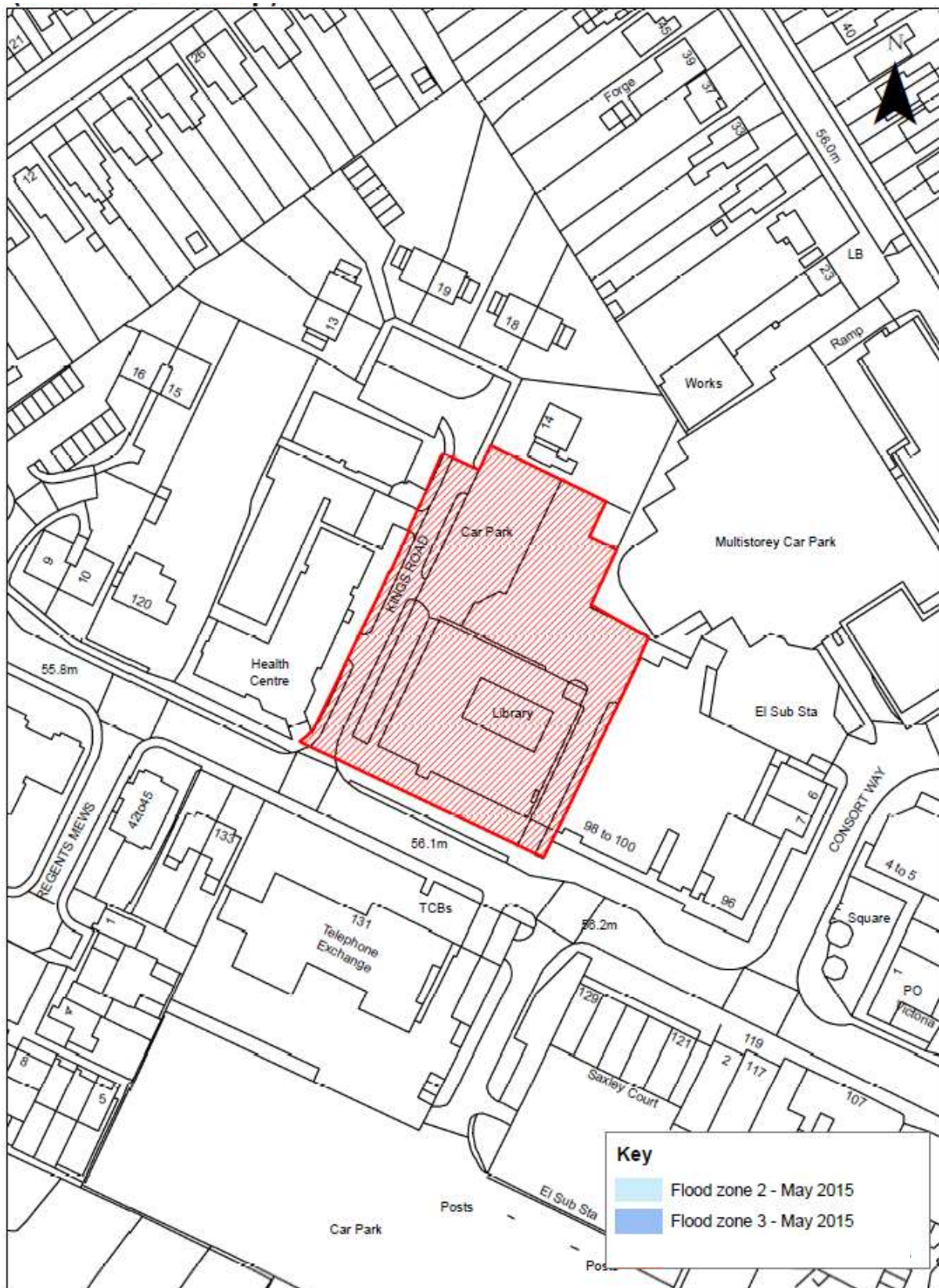
**Horley Town Centre potential development site
Royal Mail Site, 107 Victoria Road (Model flood map)**



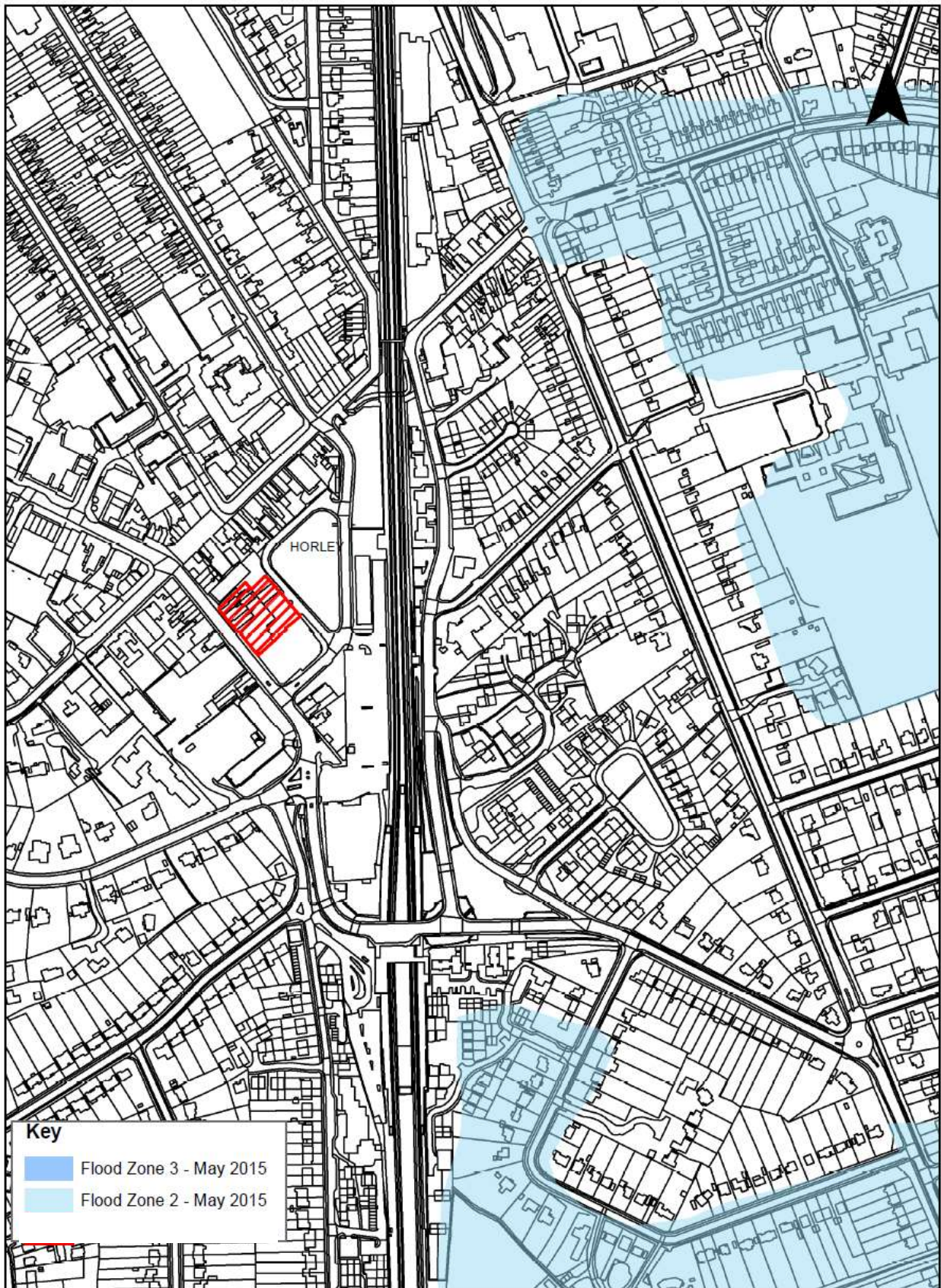
Horley Town Centre potential development site
Library Site, Kings Road (Historic flood map)



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



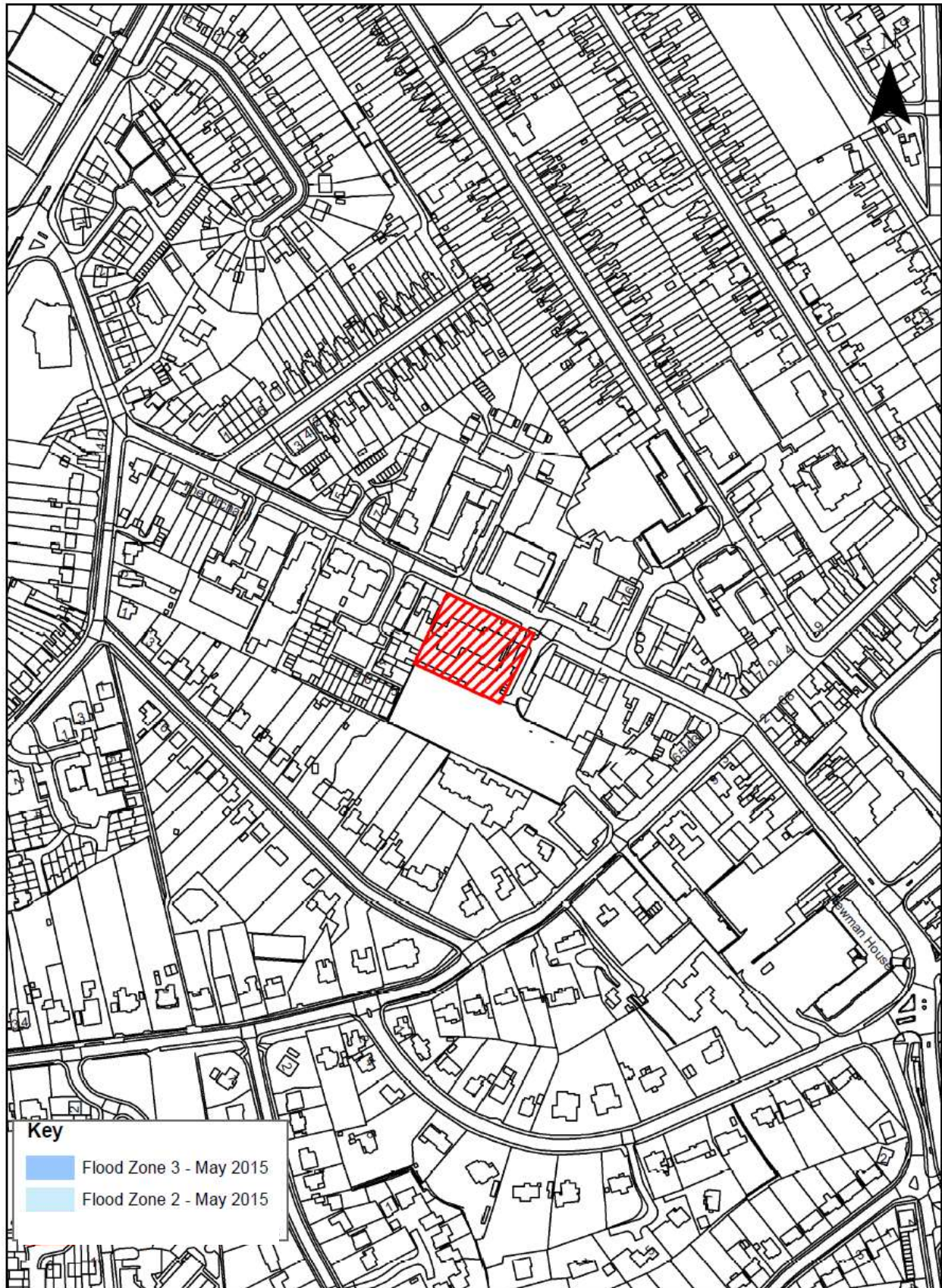
**Horley Town Centre potential development site
50-66 Victoria Road, Horley (Historic Flood Map)**



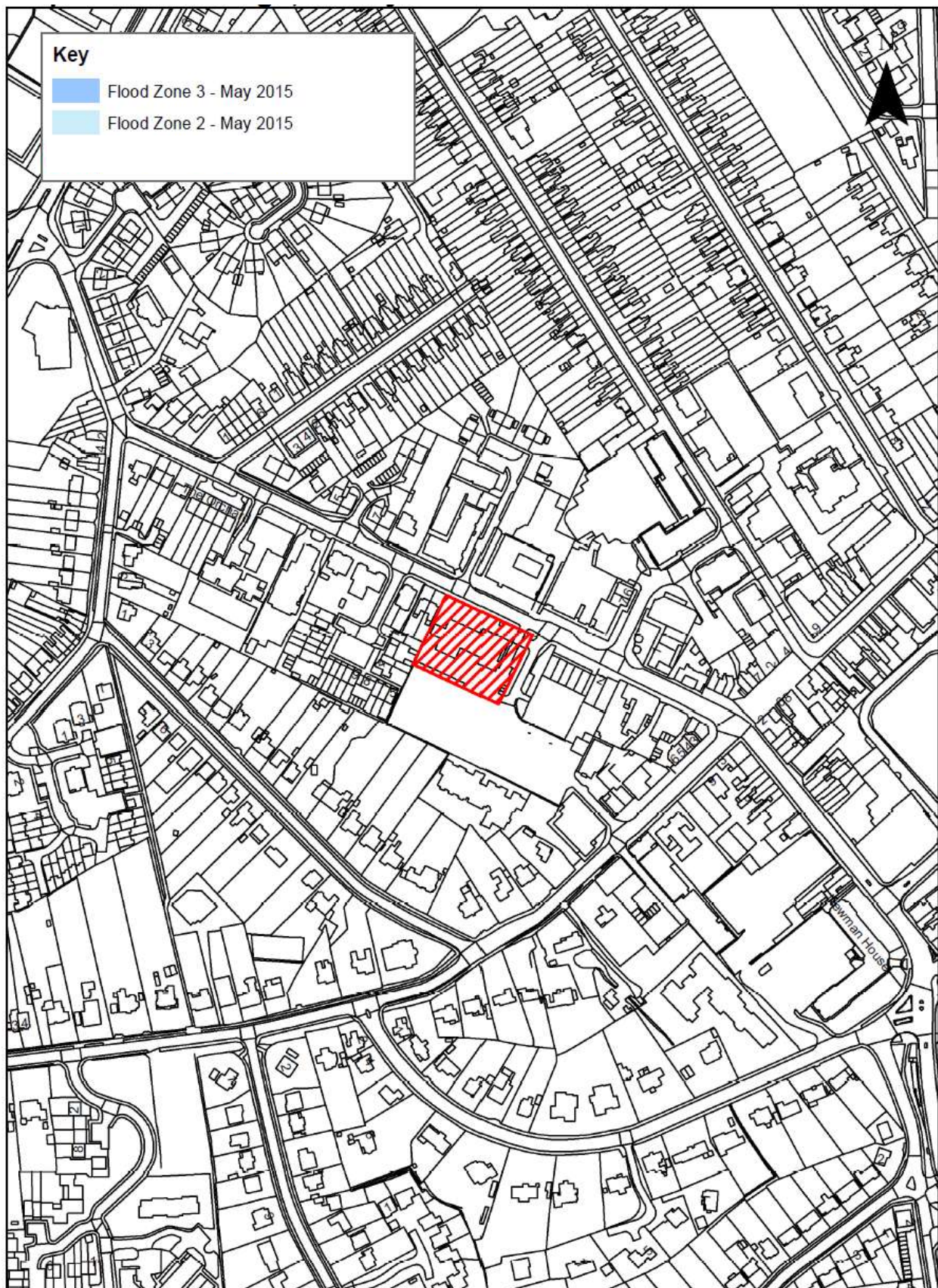
**Horley Town Centre potential development site
50-66 Victoria Road, Horley (Model Flood Map)**



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



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



Appendix B:

Urban Housing sites

B.1 – Summary table

| Site Ref. | Site Name | Location | Flood Zone (%) | | | Potential Proposed Uses | Vulnerability | Sequential Test Passed? |
|-----------|---|-----------|----------------|-----|-----|---------------------------|---------------------------------|--|
| | | | FZ1 | FZ2 | FZ3 | | | |
| A. | Land at Kingswood station | Kingswood | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| B. | Banstead Community Centre | Banstead | 100 | 0 | 0 | Residential Community use | More Vulnerable | Yes |
| C. | Quarryside Business Park | Redhill | 100 | 0 | 0 | Residential Community use | More Vulnerable | Yes |
| D. | Depot and Bellway House | Merstham | 66 | 4 | 30 | Residential | More Vulnerable | Yes, development can be directed to areas of lowest risk |
| E. | Hockley Business Centre | Redhill | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| F. | Church of Epiphany | Merstham | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| G. | Merstham Library | Merstham | 64 | 11 | 25 | Residential Community | More Vulnerable | Yes, development can be directed to areas of lowest risk |
| H. | Former Oakley Centre | Merstham | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| I. | Redhill Law Courts | Redhill | 100 | 0 | 0 | Residential Education | More Vulnerable | Yes |
| J. | Land at Reading Arch Road/Brighton Road | Redhill | 92 | 2 | 6 | Residential Retail | More Vulnerable Less Vulnerable | No – Exception Test required |
| K. | Albert Road | Reigate | 100 | 0 | 0 | Residential | More Vulnerable | Yes |

| | | | | | | | | |
|----|-------------------------|--------|-----|---|---|-------------|-----------------|-----|
| | North Industrial Estate | | | | | Employment | Less Vulnerable | |
| L. | Former Chequers Hotel | Horley | 100 | 0 | 0 | Residential | More Vulnerable | Yes |

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.

Annex B.2 - Sequential Test Questionnaire

| 5. 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"> • Land at Kingswood station, Kingswood • Banstead Community Centre, Banstead, • Quarryside Business Park, Redhill • Hockley Business Centre, Redhill • Church of Epiphany, Merstham • Former Oakley Centre, Radstock Way, Merstham • Redhill Law Courts, Redhill • Albert Road North Industrial Estate, Reigate • Former Chequers Hotel, Horley <p>For sites in Horley, the Council is taking a precautionary approach by relying upon the historic EA flood mapping (on the advice of the EA), until such time the current EA flood investigations conclude and updated modelling has been undertaken. At this stage, the approach taken will be revisited in consultation with the Environment Agency.</p> <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>Bellway House & Depot site, Merstham:</u> Around 34% of the northern part of the site lies in FZ3 and FZ2. • <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>Land at Reading Arch Road/Brighton Road:</u> Around 8% of the site lies within FZ2 and 3. <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>Bellway House & Depot site, Merstham:</u> Development could be concentrated on parts of the site in FZ1. 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. • <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. <p><i>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.</i></p> |
| No | <p>a) Explain why the proposals cannot be redirected to Zone 1:</p> <ul style="list-style-type: none"> • <u>Land at Reading Arch Road/Brighton Road:</u> Although the majority of the site is in flood zone 1, parts of the site affected by flood zones 2 and 3 are dispersed across the site instead of being concentrated in a discrete area. This would make it difficult for comprehensive and efficient development to be achieved on solely FZ1. Sites for retail and residential are limited and full potential for development is important in order to deliver the scale of development required to support the necessary growth of Redhill. <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.</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.

| | |
|--|--|
| 7. For sites in 'Zone 2 Medium Probability' of flood risk. | |
| d. Proposed uses for the entire site: | |
| <ul style="list-style-type: none"> <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>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 Zone 3.</i></p> |
| 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> |
| 8. For sites in 'Zone 3a High Probability and Zone 3b Functional Flood Plain' of flood risk. | |
| f. Proposed uses for the entire site: | |
| <ul style="list-style-type: none"> <u>Land at Reading Arch Road/Brighton Road:</u> Residential and retail | |
| g. 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 |

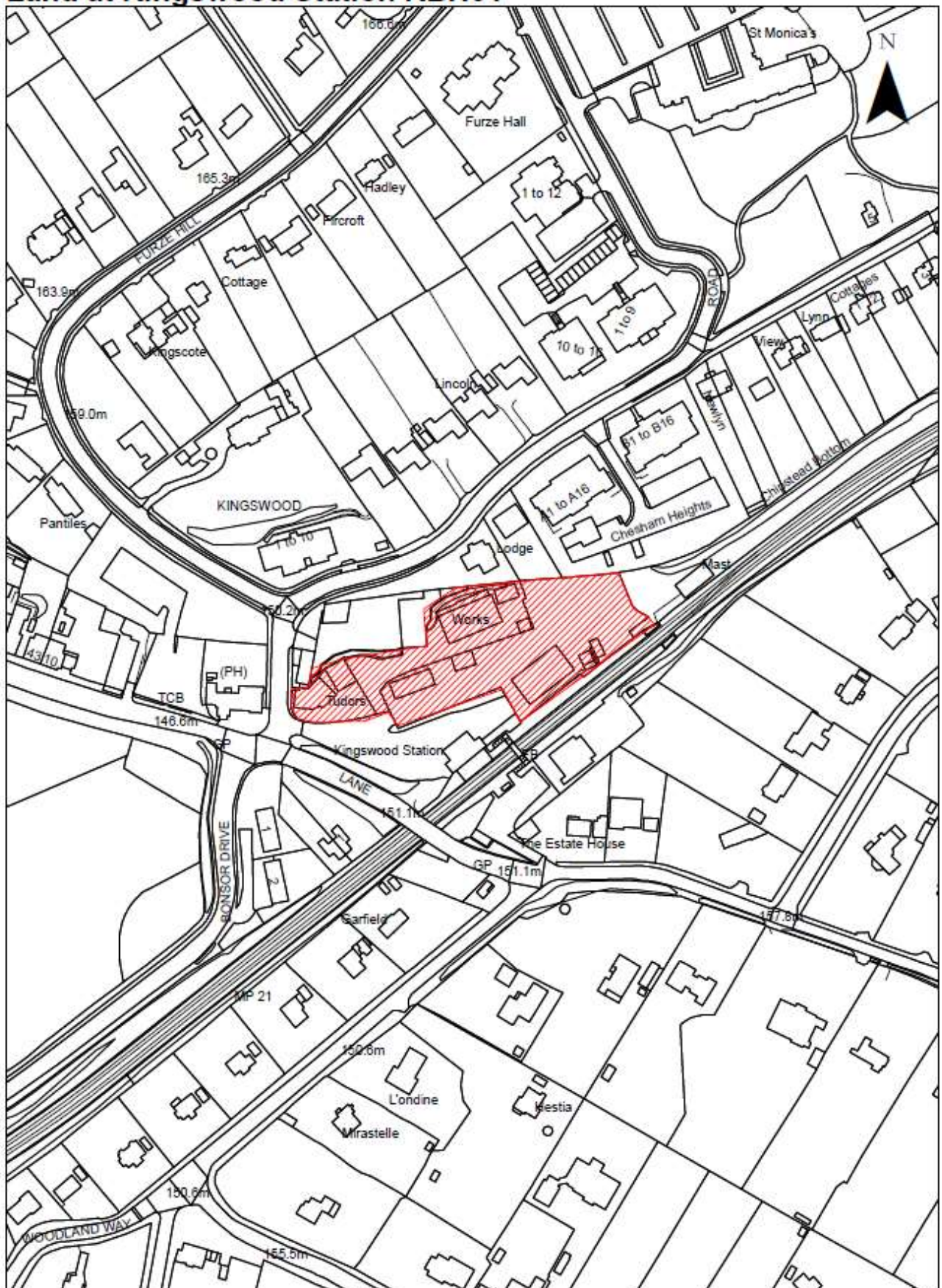
| | |
|--|---|
| No | <p>Explain why the development types cannot be relocated</p> <ul style="list-style-type: none"> <u>Land at Reading Arch Road/Brighton Road:</u> FZ2 and FZ3 are located around the centre of the site, but FZ2 only accounts for a small part of this centre area. This would make it difficult for comprehensive and efficient development to be achieved on FZ2. Sites for retail and residential are limited and full potential for development is important in order to deliver the scale of development required to support Redhill. |
| h. 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> <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>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> |
| i. 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>N/A</p> |
| No | <p>Explain why the development types cannot be relocated:</p> <ul style="list-style-type: none"> <u>Land at Reading Arch Road/Brighton Road:</u> 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. <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> |

| | |
|--|--|
| | <p>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.</p> |
| j. 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 | <p>Identify how the risks could be reduced:</p> <p>N/A – no highly vulnerable development types proposed</p> |
| No | <p>N/A – no highly vulnerable development types proposed</p> |

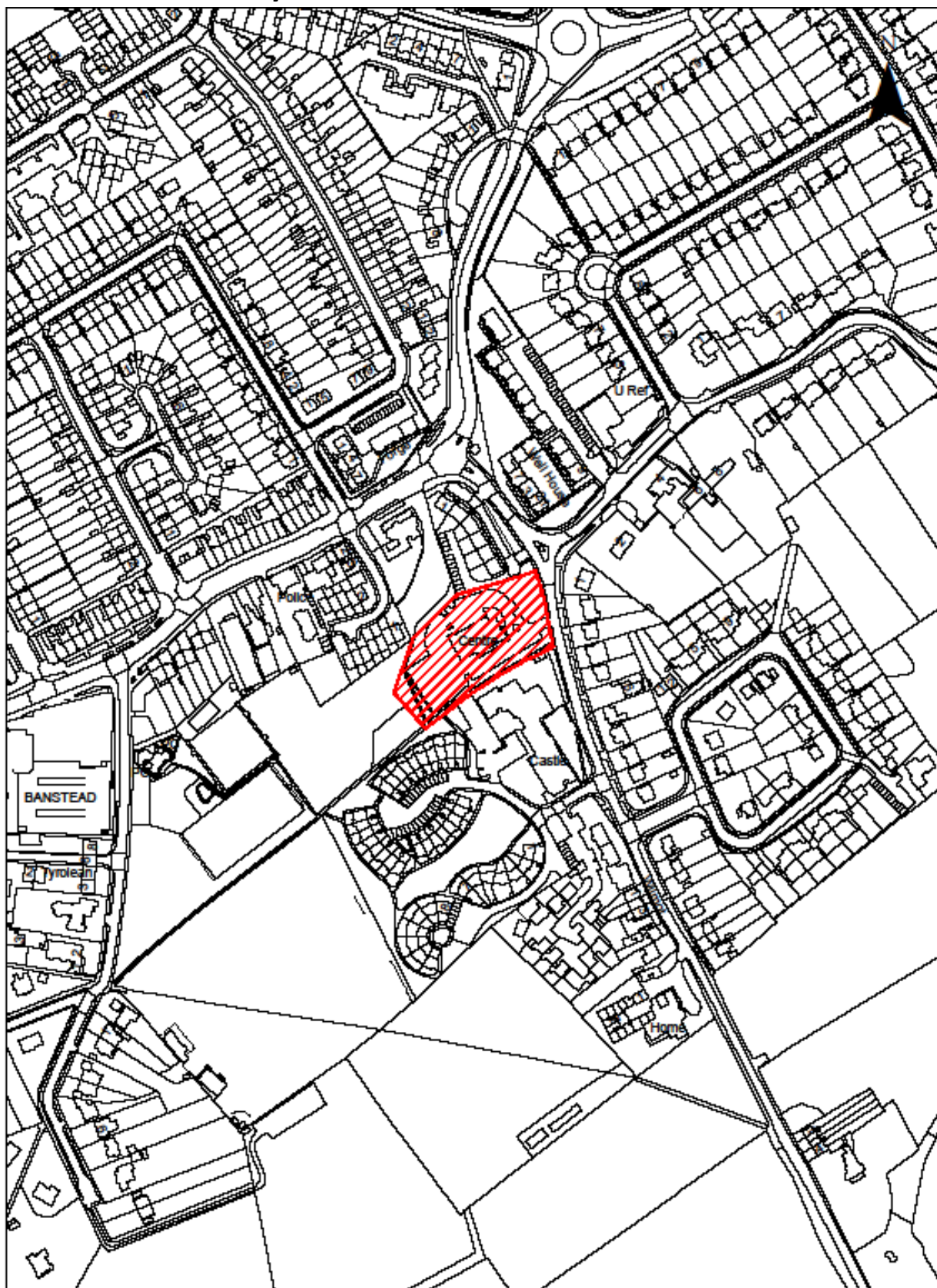
B.3 – Maps

Banstead Urban Housing Site

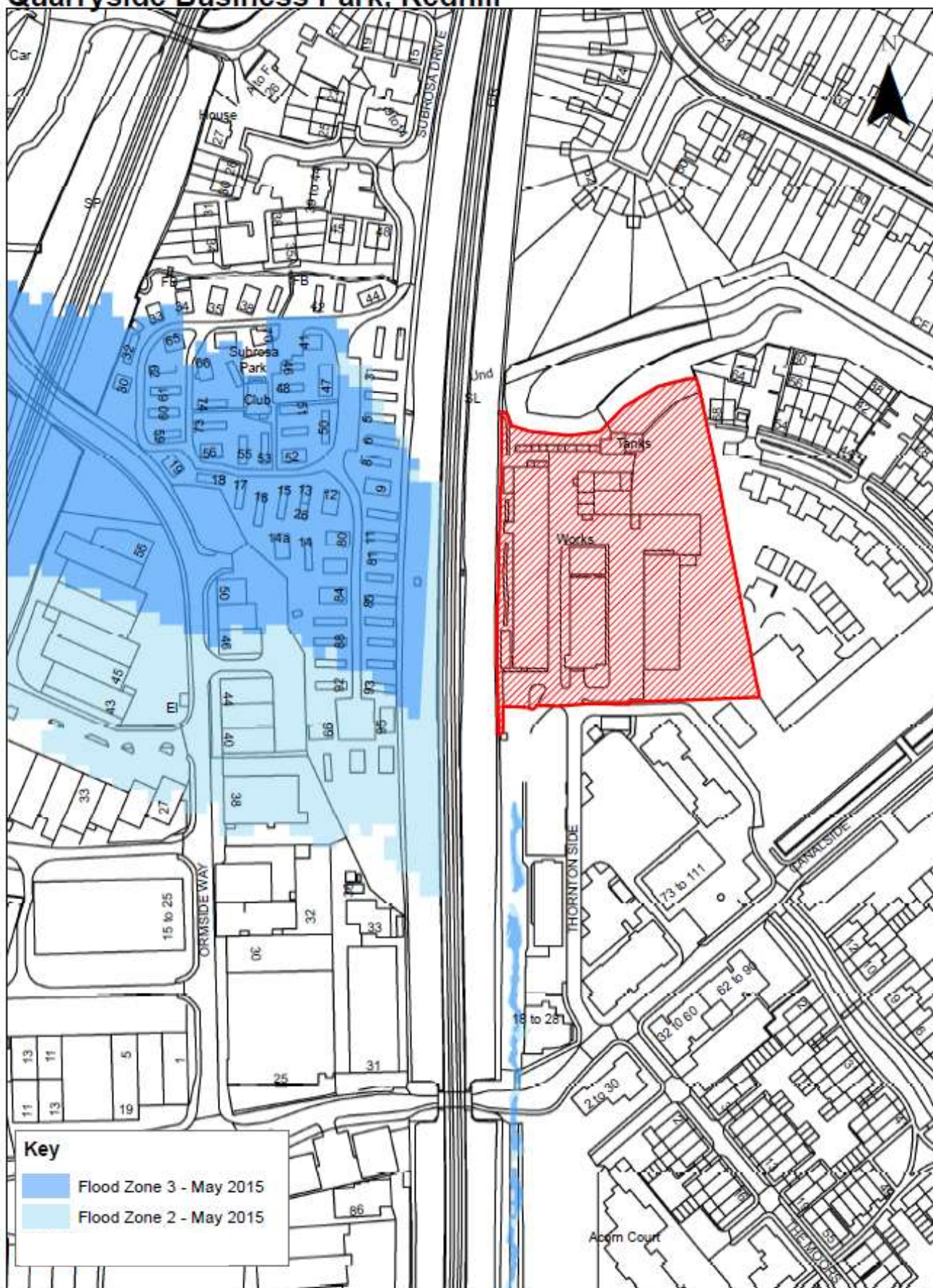
Land at Kingswood Station KBH01



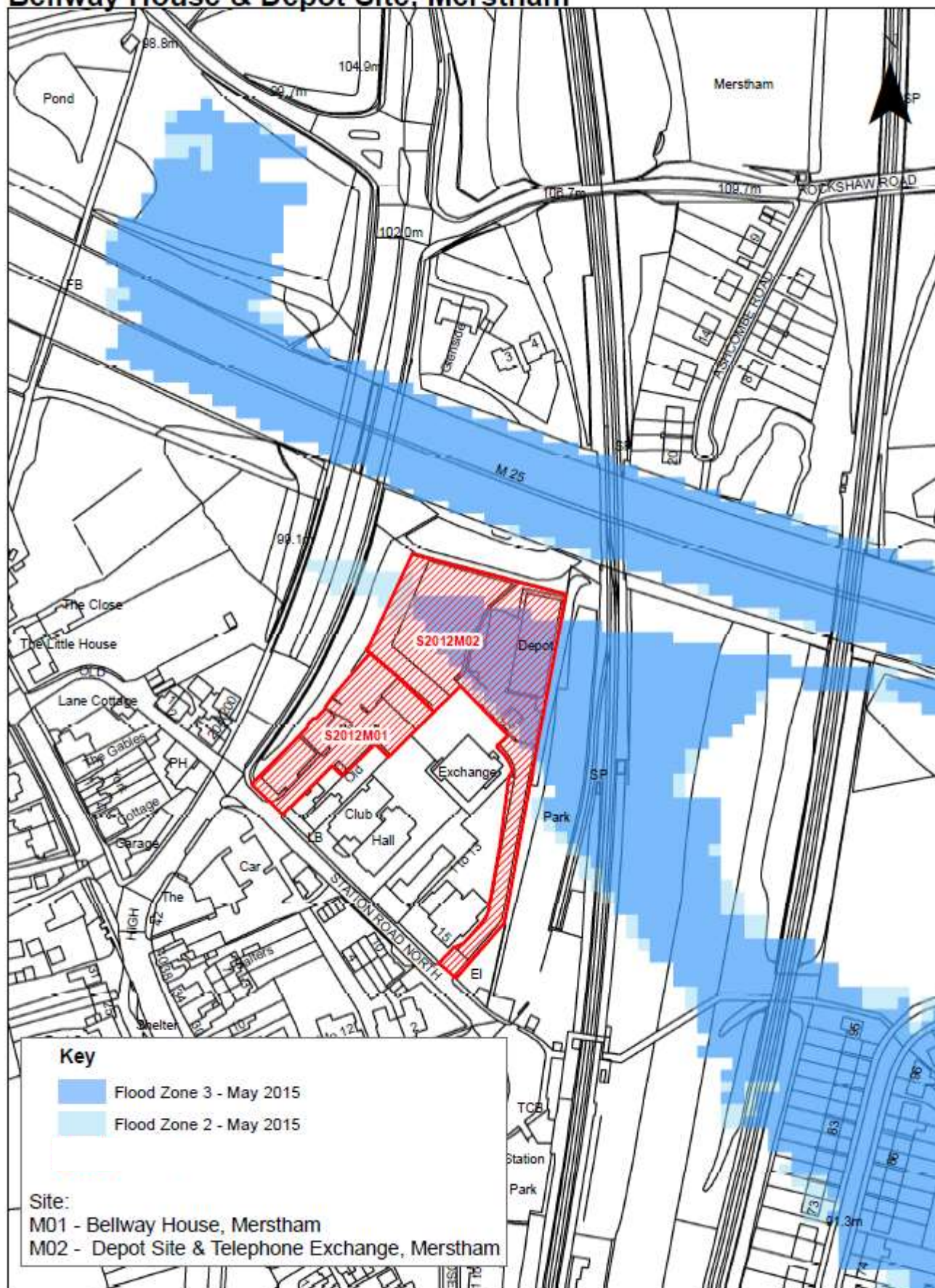
Banstead Urban Housing Site Banstead Community Centre



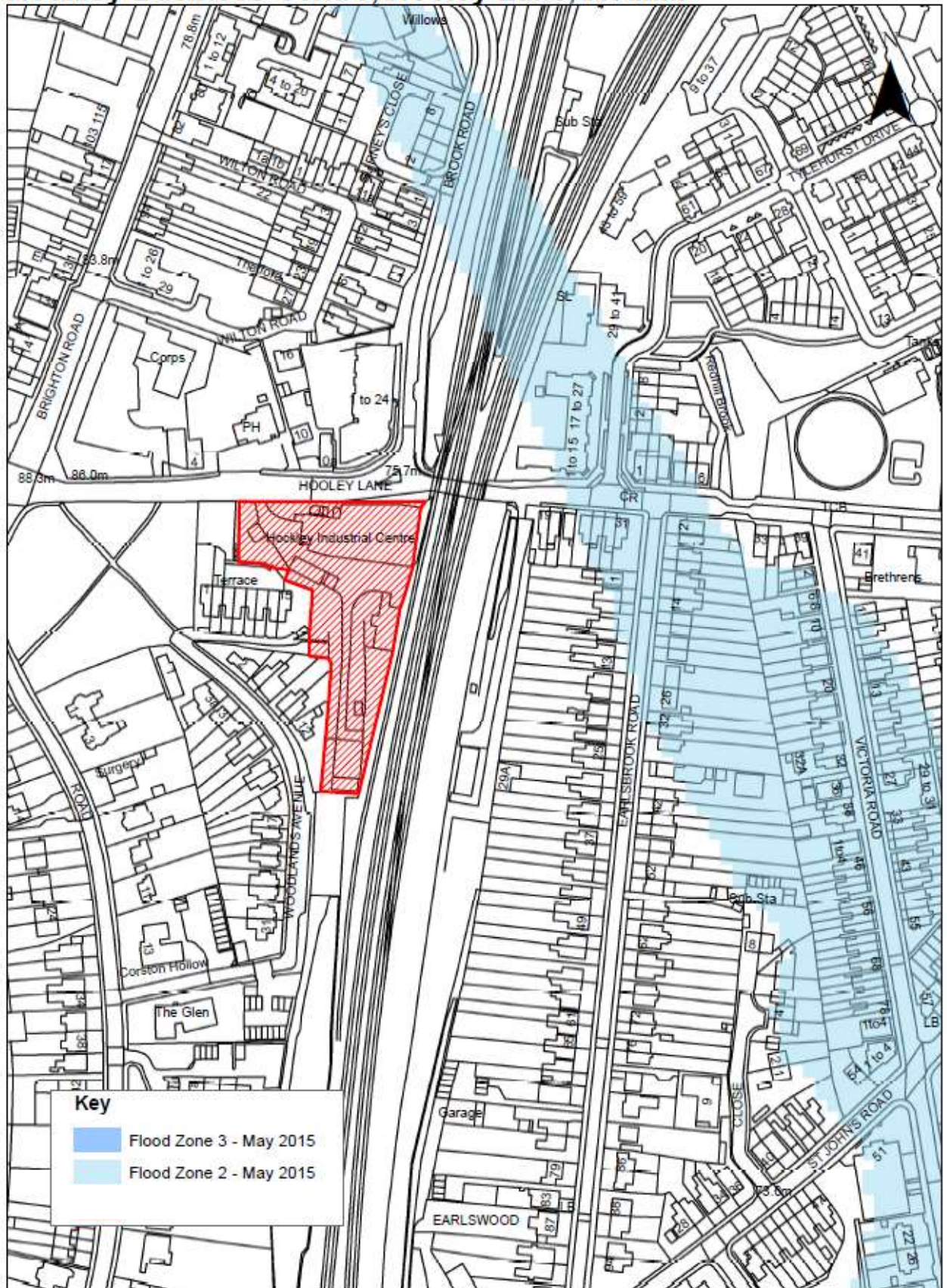
Redhill Urban Housing Site Quarryside Business Park, Redhill



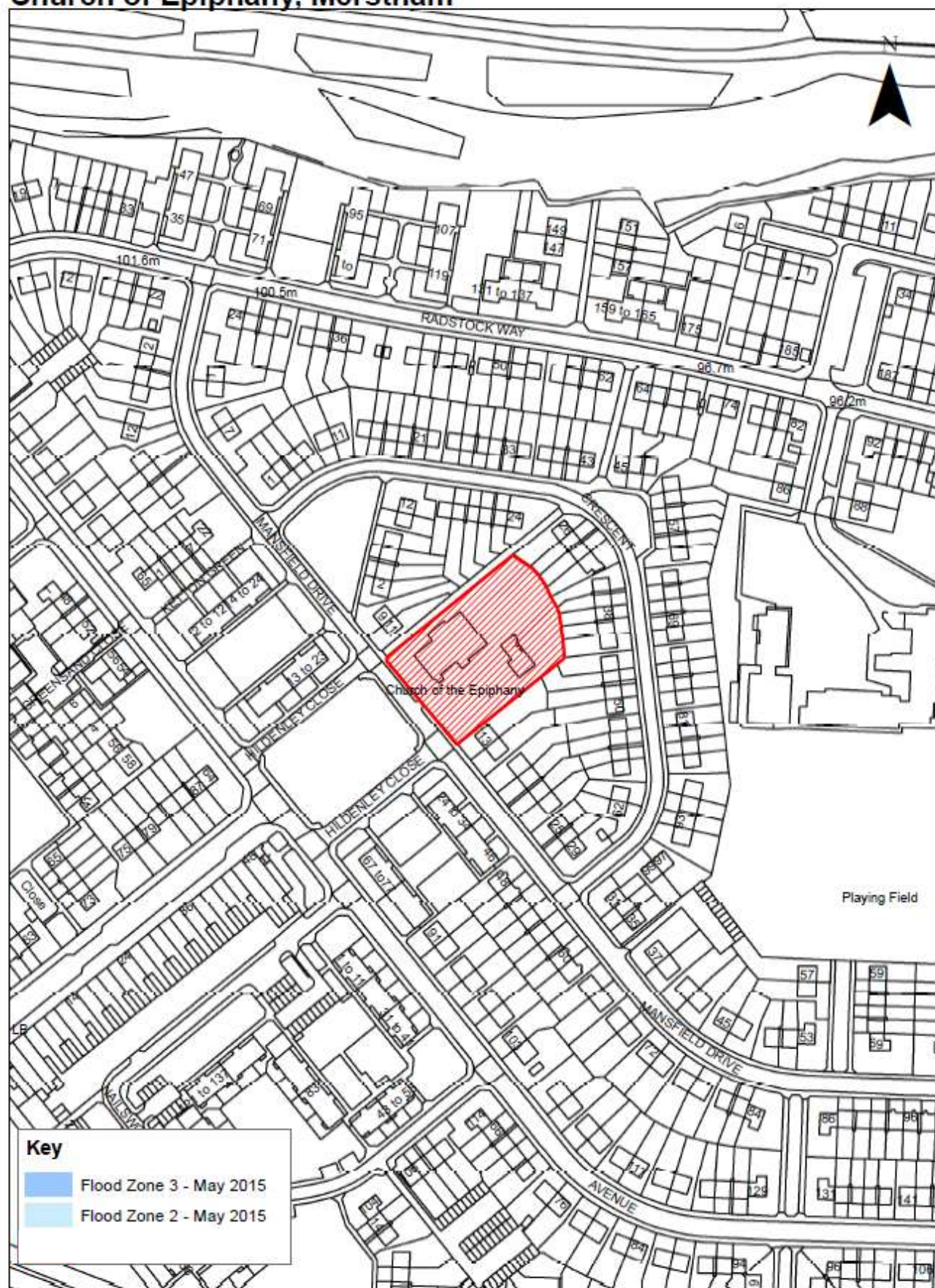
Redhill Urban Housing Site Bellway House & Depot Site, Merstham



Redhill Urban Housing Site Hockley Business Centre, Hooley Lane, Redhill

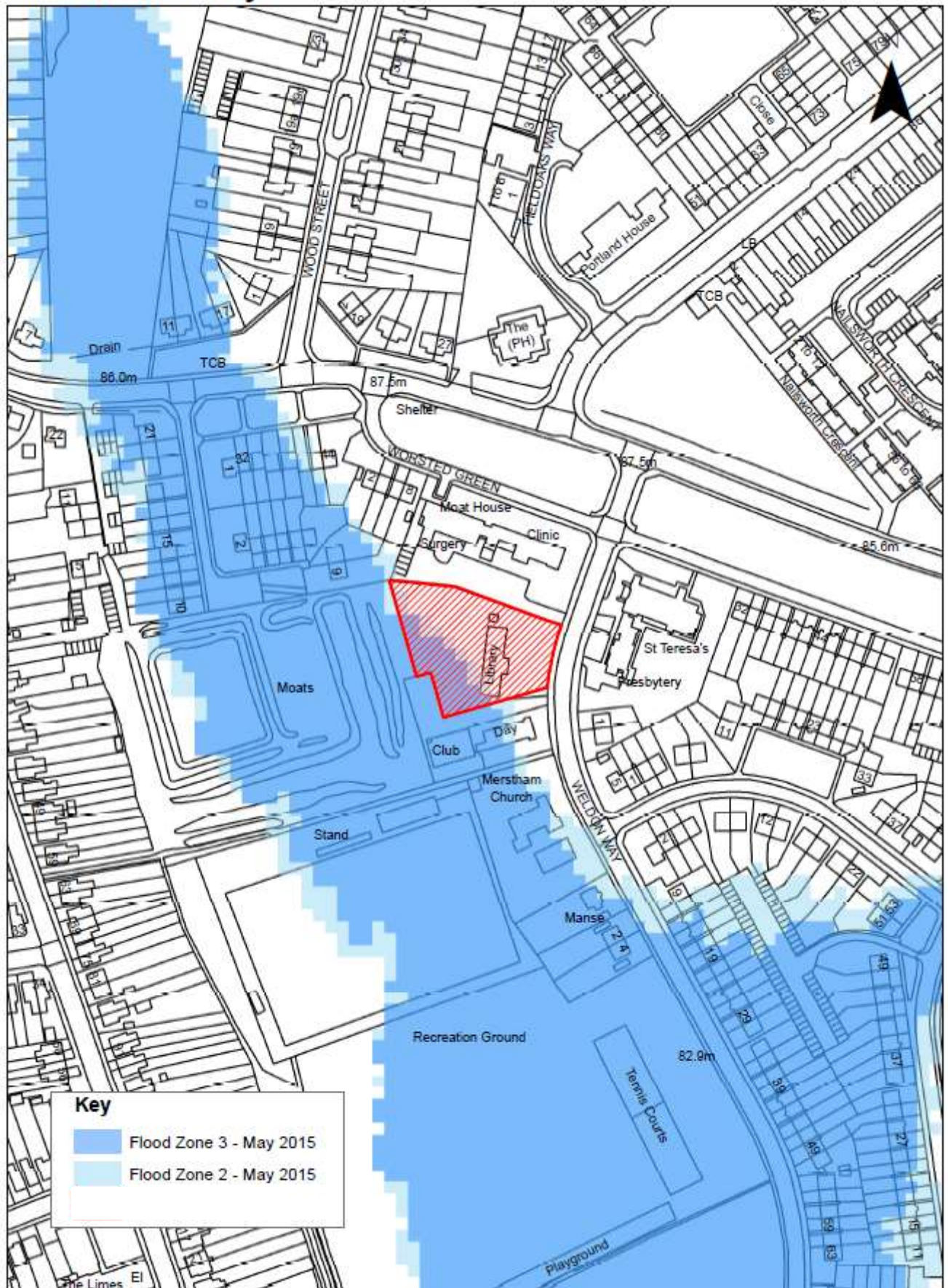


Merstham Urban Housing Site Church of Epiphany, Merstham

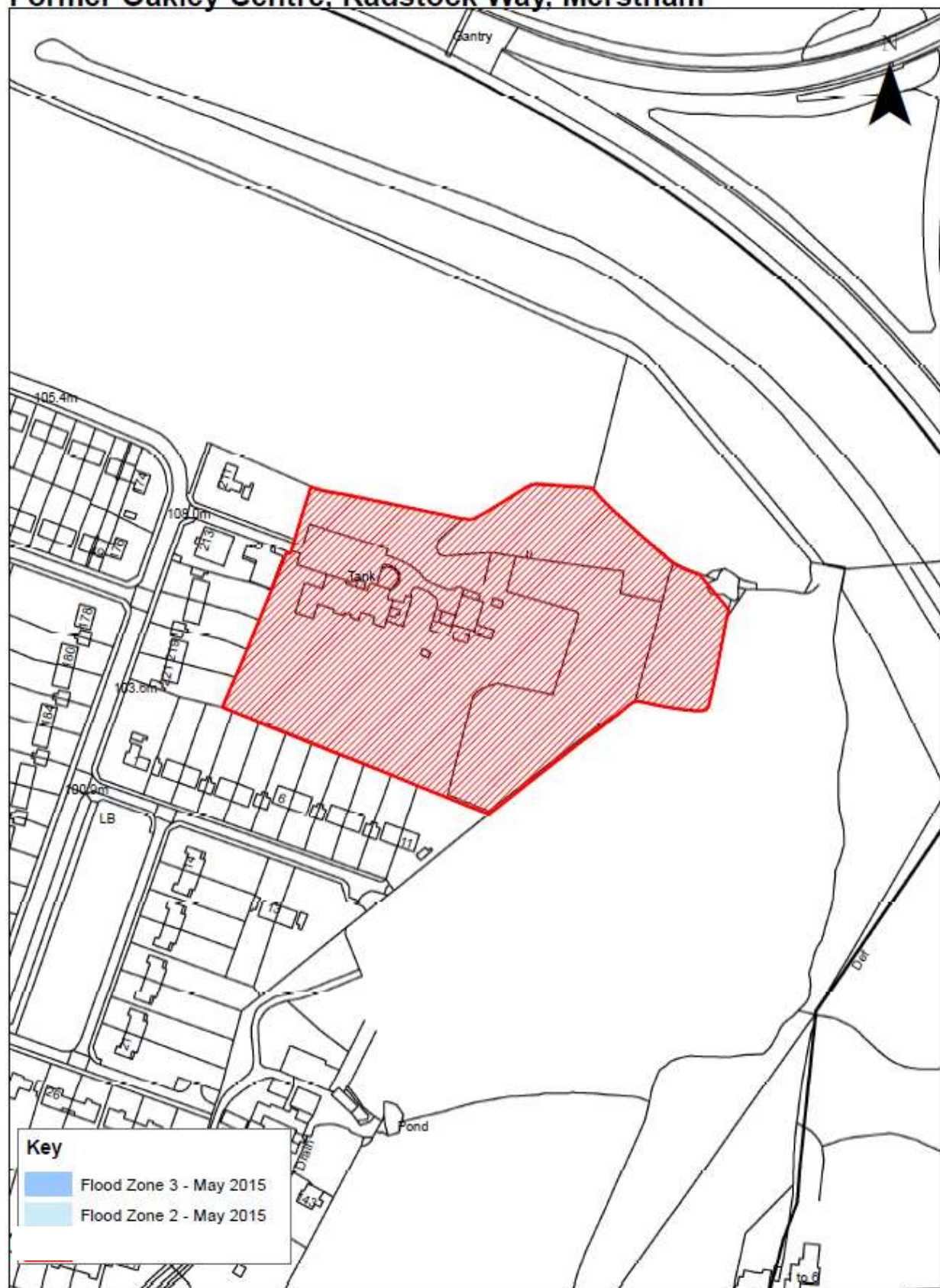


Merstham Urban Housing Site

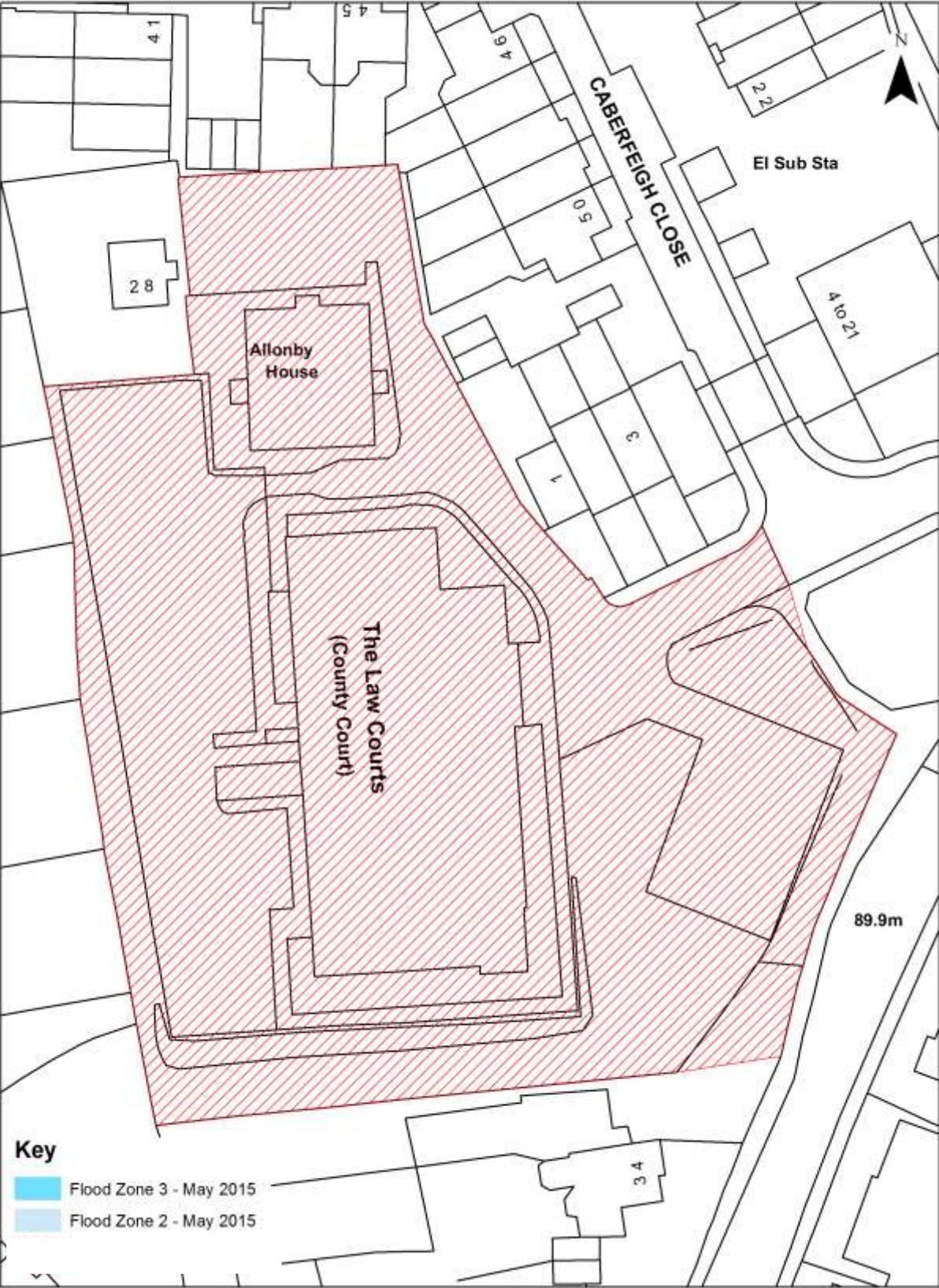
Merstham Library



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



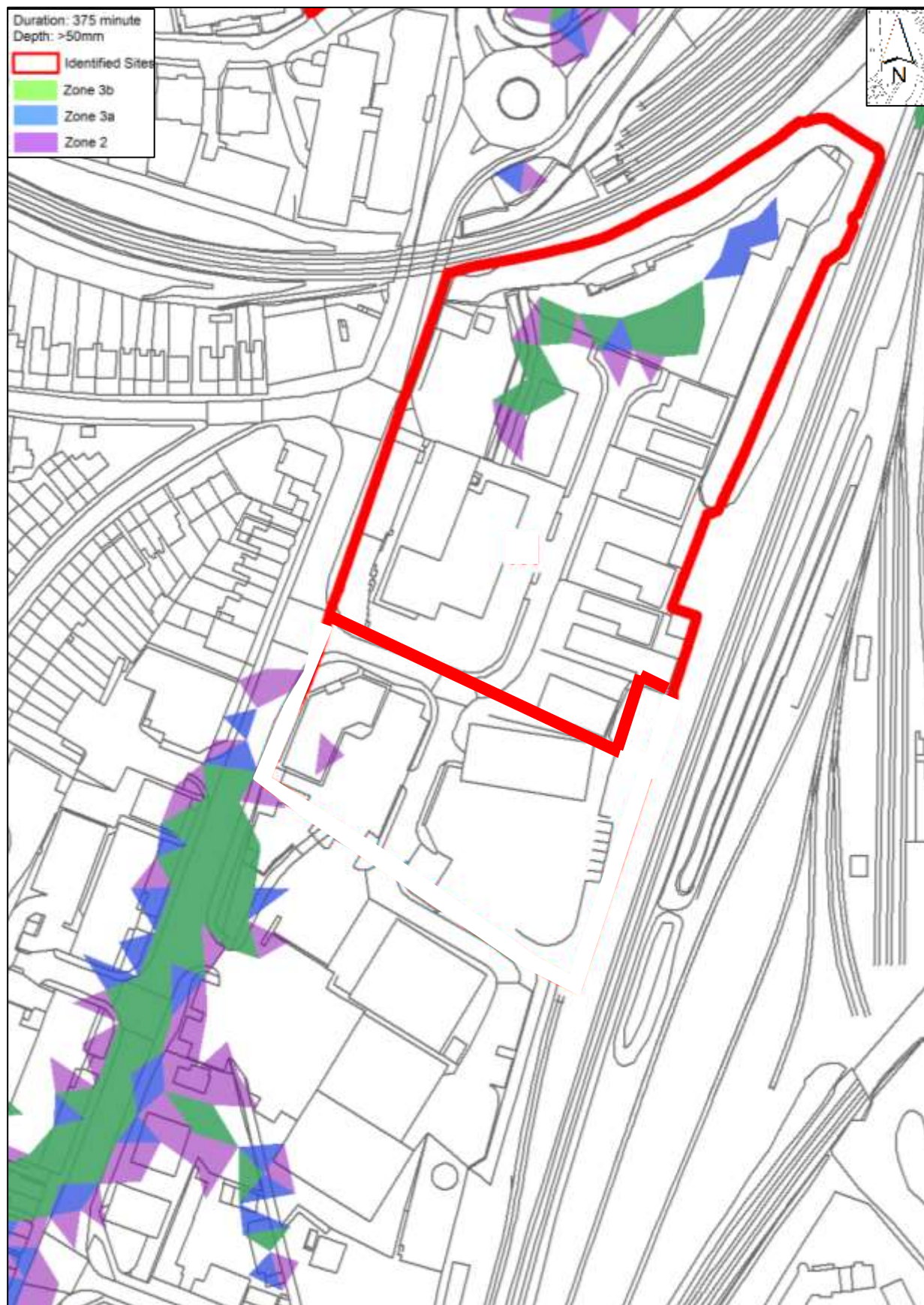
**Redhill Urban Housing Site
Redhill Law Courts**



Redhill Urban Housing Site

Land at Reading Arch Road/Brighton Road

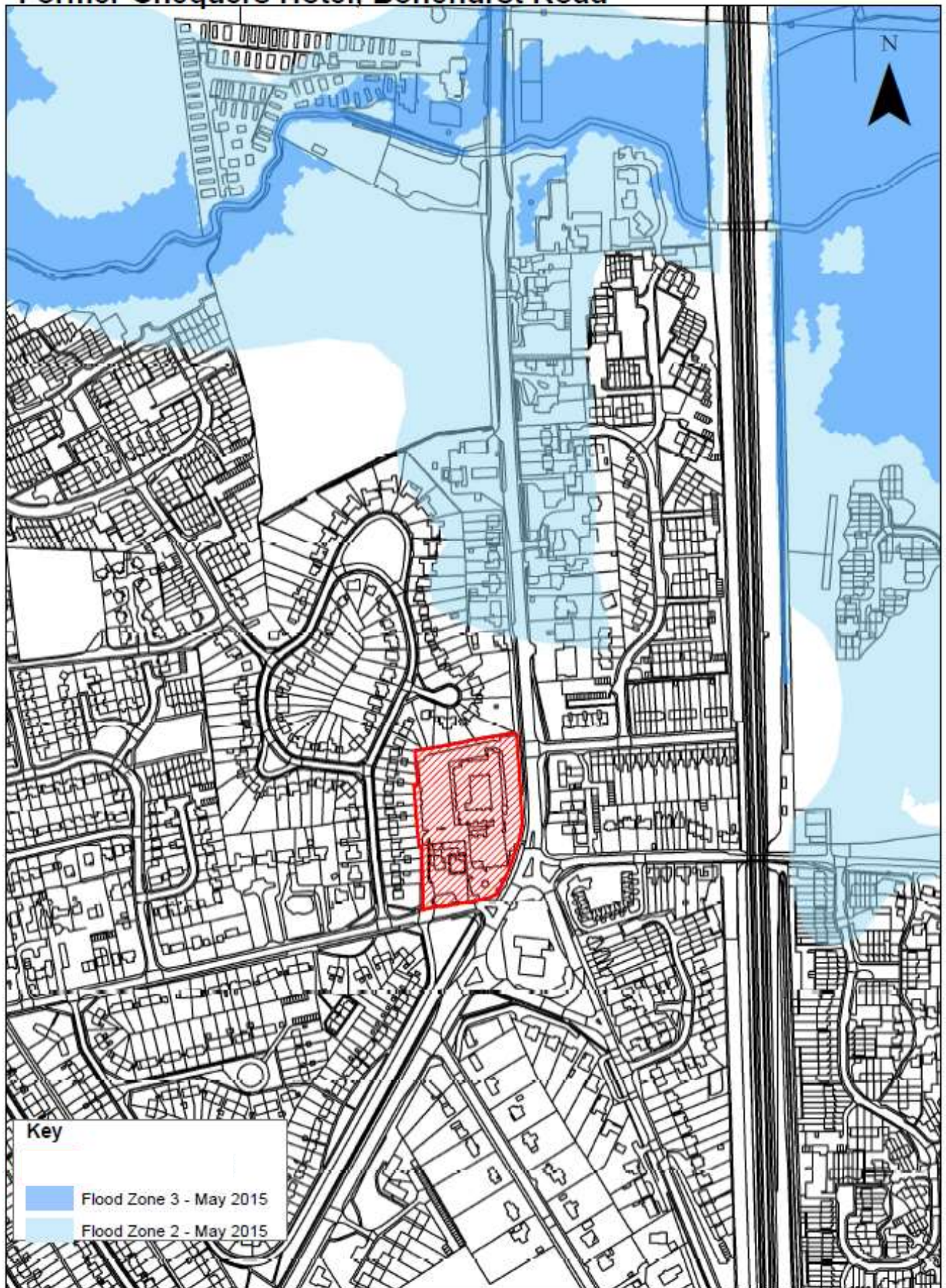
(Flood map taken from the “Sequential test for flood risk: Addendum for Redhill town centre”)



Reigate Urban Housing Site Albert Road North Industrial Estate



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

| Site Ref. | Site Name | Location | Flood Zone (%) | | | Potential Proposed Uses | Vulnerability | Sequential Test Passed? |
|-----------|---------------------------------|--------------------|----------------|-----|-----|--|--|-------------------------|
| | | | FZ1 | FZ2 | FZ3 | | | |
| ERM1 | Land at Hillsbrow | East Redhill | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| ERM2 | Land west of Copyhold Works | East Redhill | 100 | 0 | 0 | Residential Open space | More Vulnerable Water-compatible | Yes |
| ERM3 | Former Copyhold Works | East Redhill | 100 | 0 | 0 | Residential Education/ community | More Vulnerable | Yes |
| ERM4 | 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 Hartwood Nursery | South west Reigate | 100 | 0 | 0 | Residential | More Vulnerable | Yes |
| SSW8 | Land at Hartwood 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 Langshott Wood | East Horley | 54.8 | 45 | 0.2 | Residential | More Vulnerable | Yes – development can be directed to FZ1 only. |

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|------|---|-------------------|-----|----|----|-------------|-----------------|---|
| 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 | South East | 5 | 68 | 27 | Residential | More | No – development could |

| | | | | | | | | |
|-------|--------------------------------|-------------------|----|----|----|-------------|-----------------|--|
| | View Farm | Horley | | | | | Vulnerable | 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 | Yes – development can be directed to FZ1 only. |

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.

9. 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. 0.4% 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

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| | <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> |

10. 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. 37% of the site) with a small amount of FZ2 in the centre of the site (approx. 8% 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. 65% of the site) with a band of FZ3 along the north western border of the site (approx. 8% of the site). The south eastern part of the site lies within FZ1 (approx. 27% 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 norther 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"> <p><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></p> <p><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></p> <p><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> <p><u>South East Horley - SEH12</u>: The site is predominantly in FZ2 & 3 with FZ3 concentrated along the stretch of the western border. Part of the site sits within FZ1. <i>The Environment Agency provided an update of the flood maps in 2013/14, which incorporates the northern part of the site in FZ1.</i></p> <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 potential 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>N/A – 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.</p> <p>b) Explain why the proposals cannot be redirected to Flood Zone 1:</p> <ul style="list-style-type: none"> <p><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</p> |

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.

- 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**

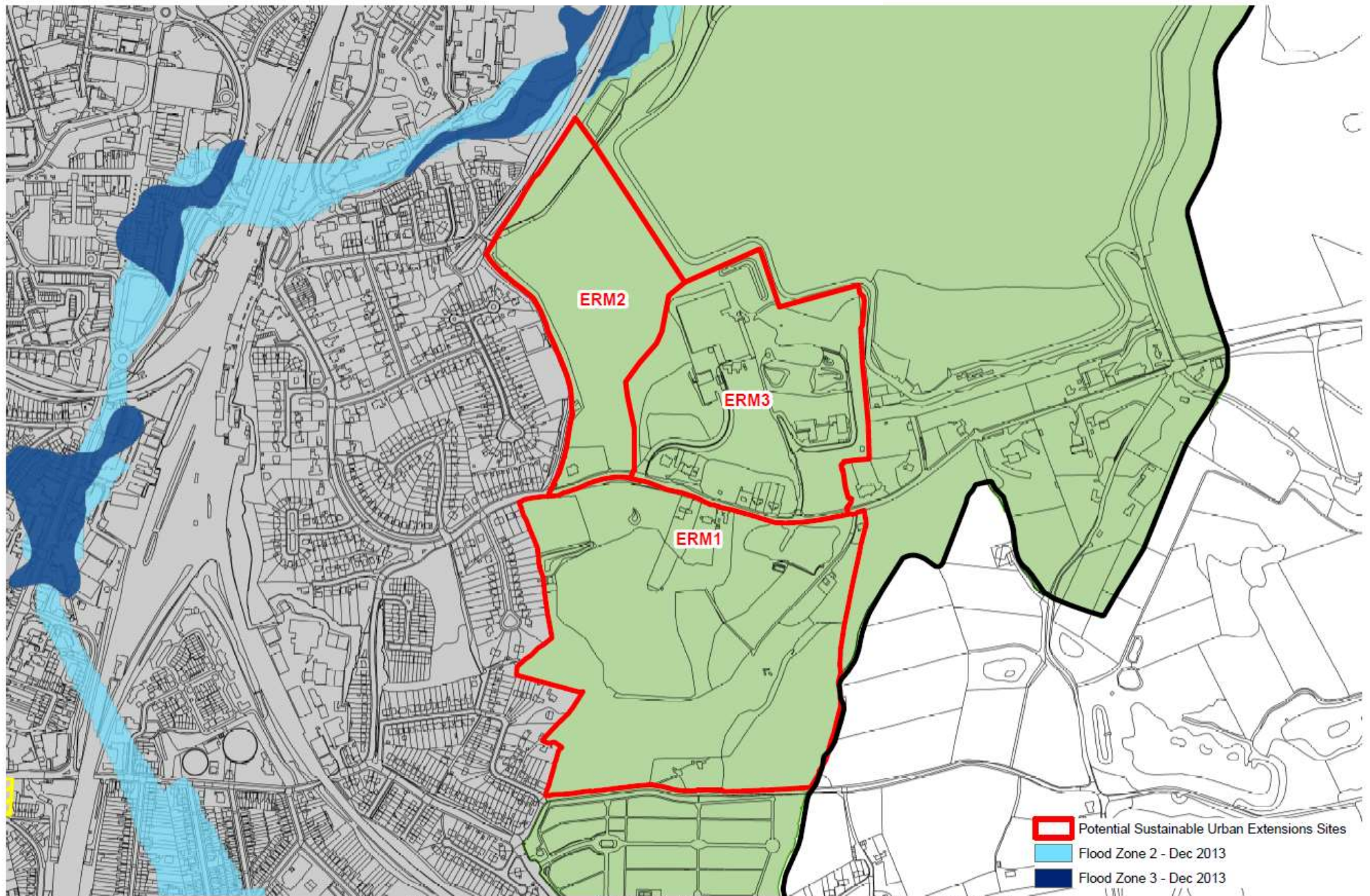
The Environment Agency provided an update of the flood maps in 2013/14, which shows a reduction in FZ2. FZ3 remains unchanged and cuts across the western part of the site.

- 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.

C.3 - Overarching maps

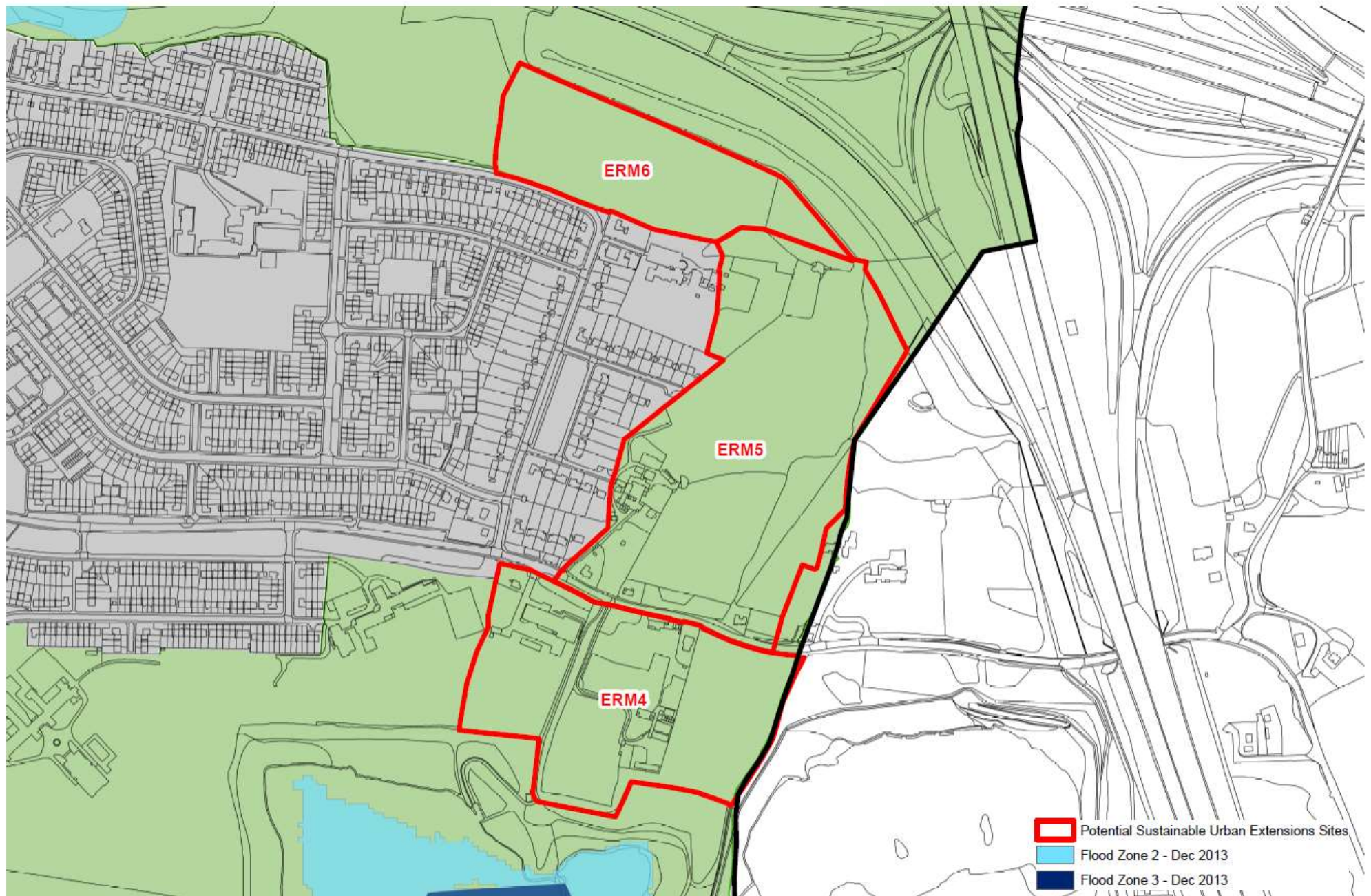
EAST REDHILL



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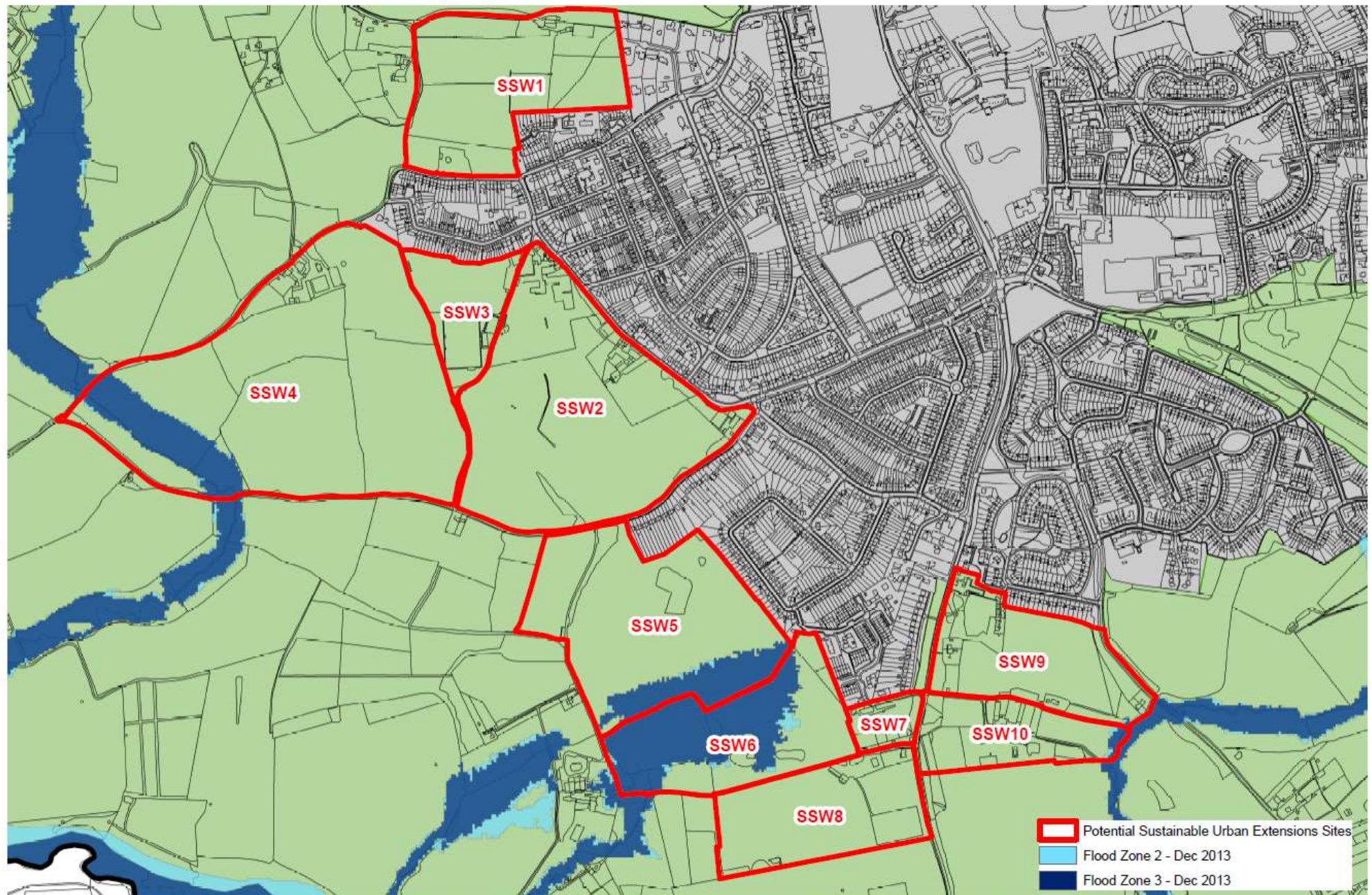
EAST MERSTHAM



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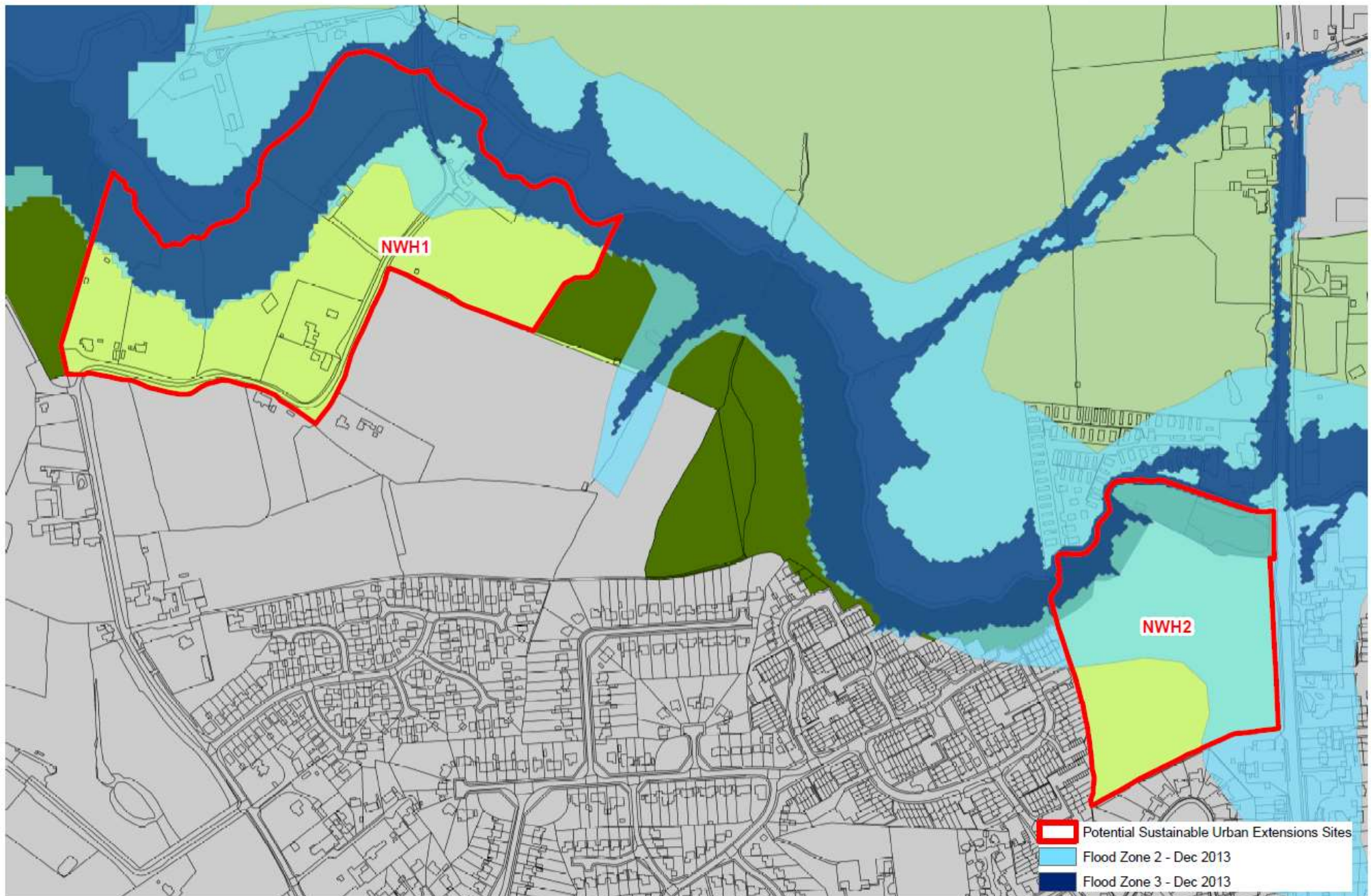
SOUTH REIGATE



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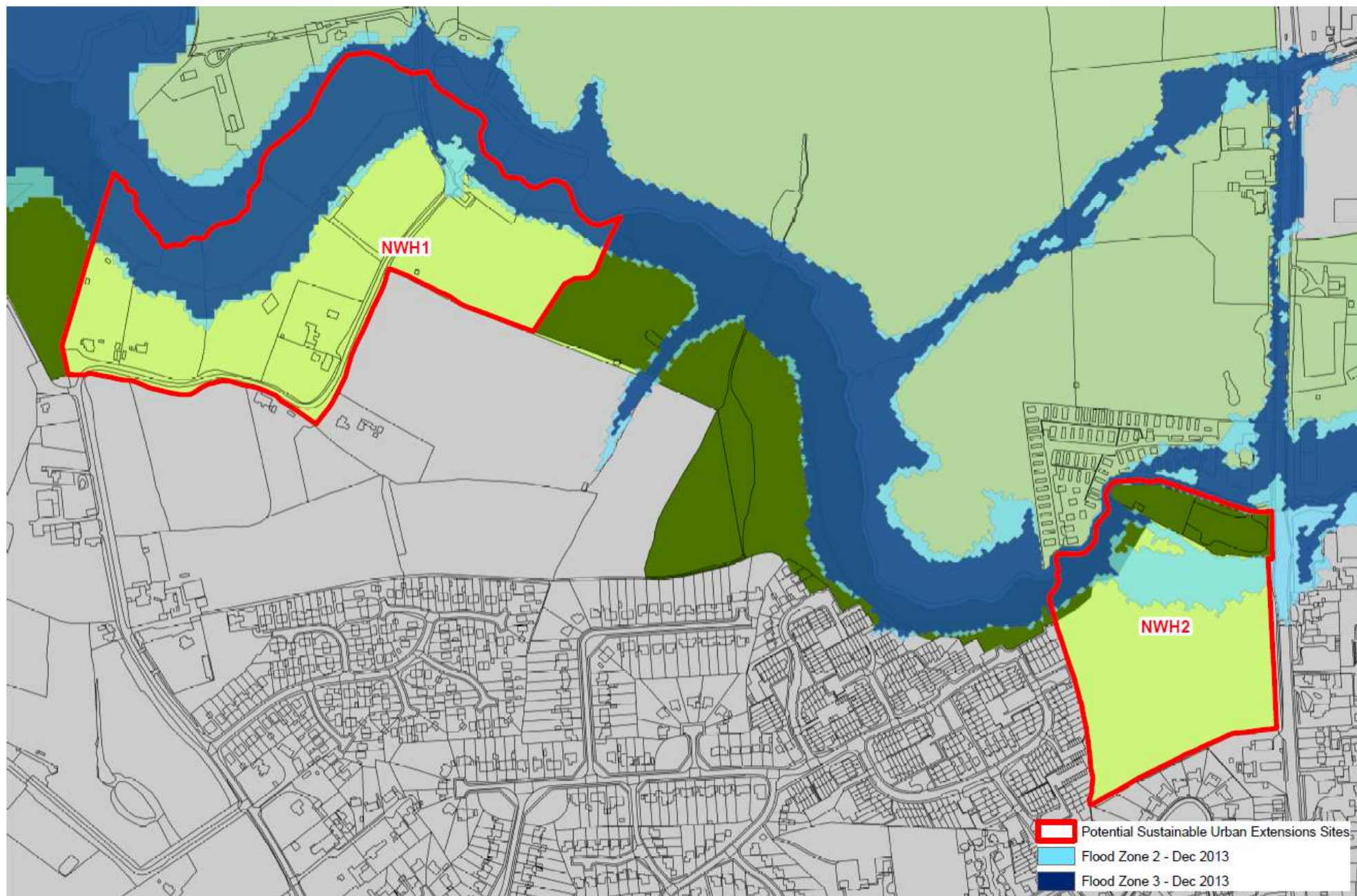
NORTH HORLEY (including historic flood event)



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NORTH HORLEY (excluding historic flood event)

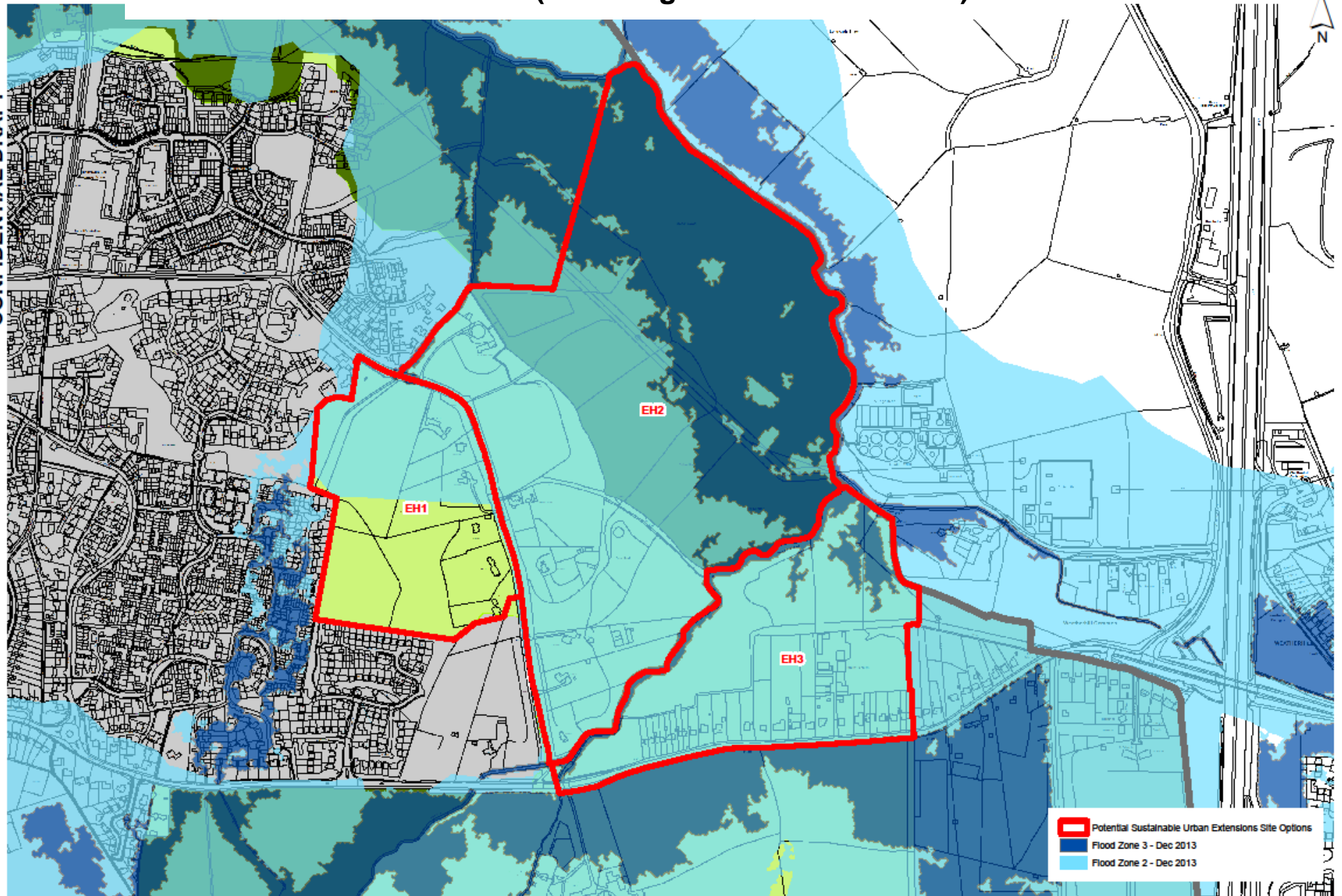


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EAST HORLEY (including historic flood event)

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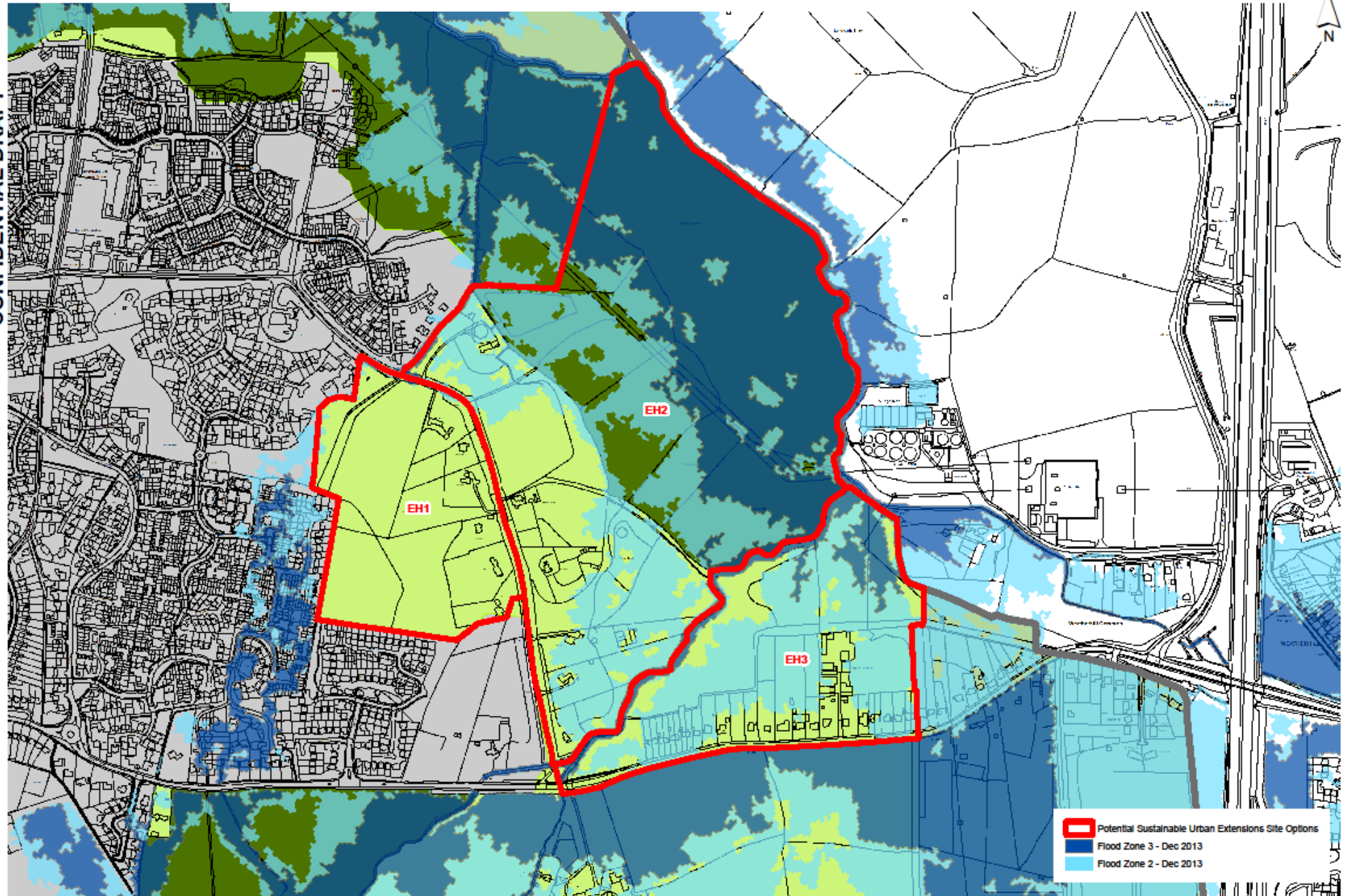
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Scale 1:5,000

EAST HORLEY (Excluding historic flood event)

CONFIDENTIAL DRAFT

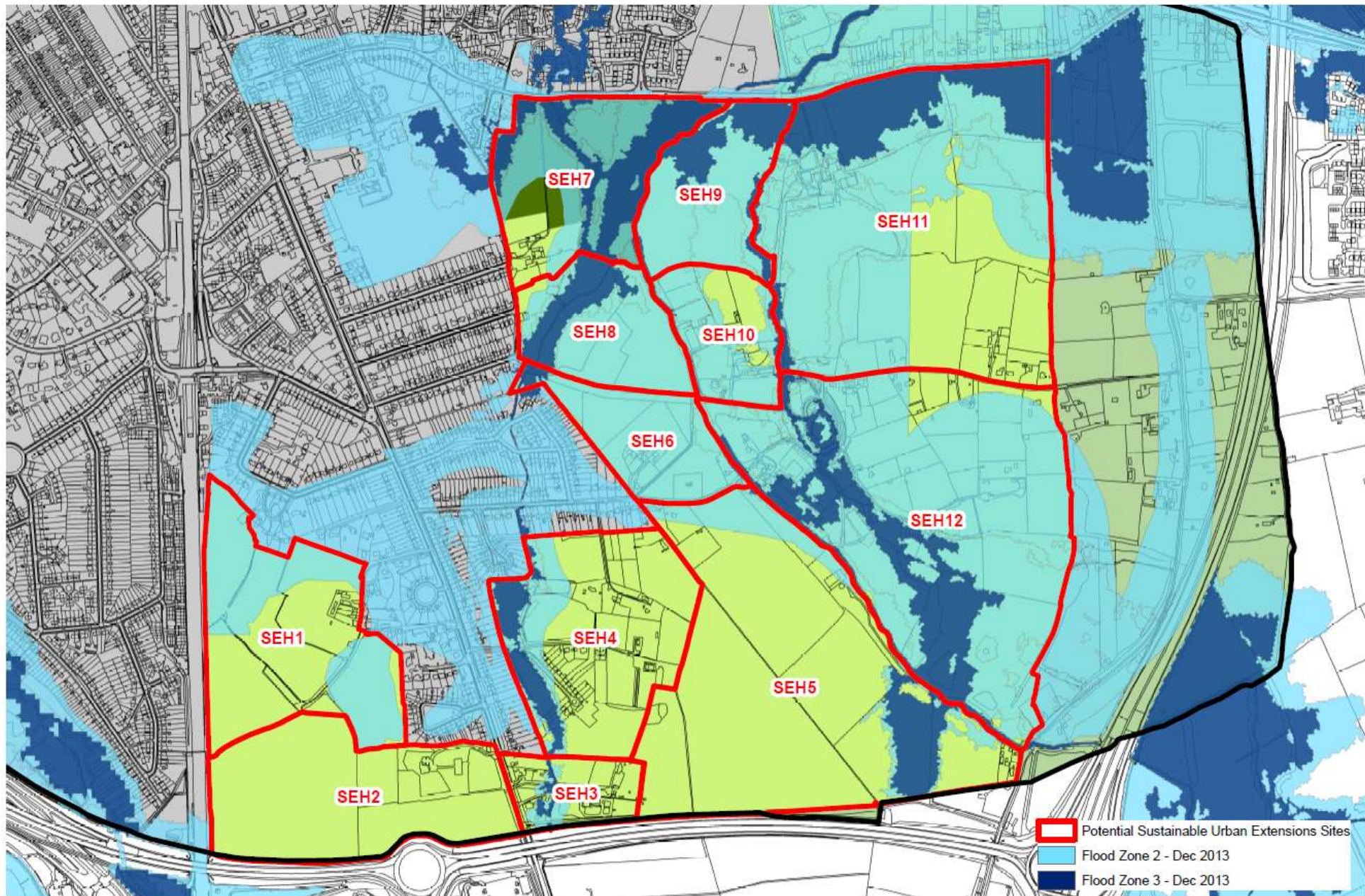


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Scale 1:5,000

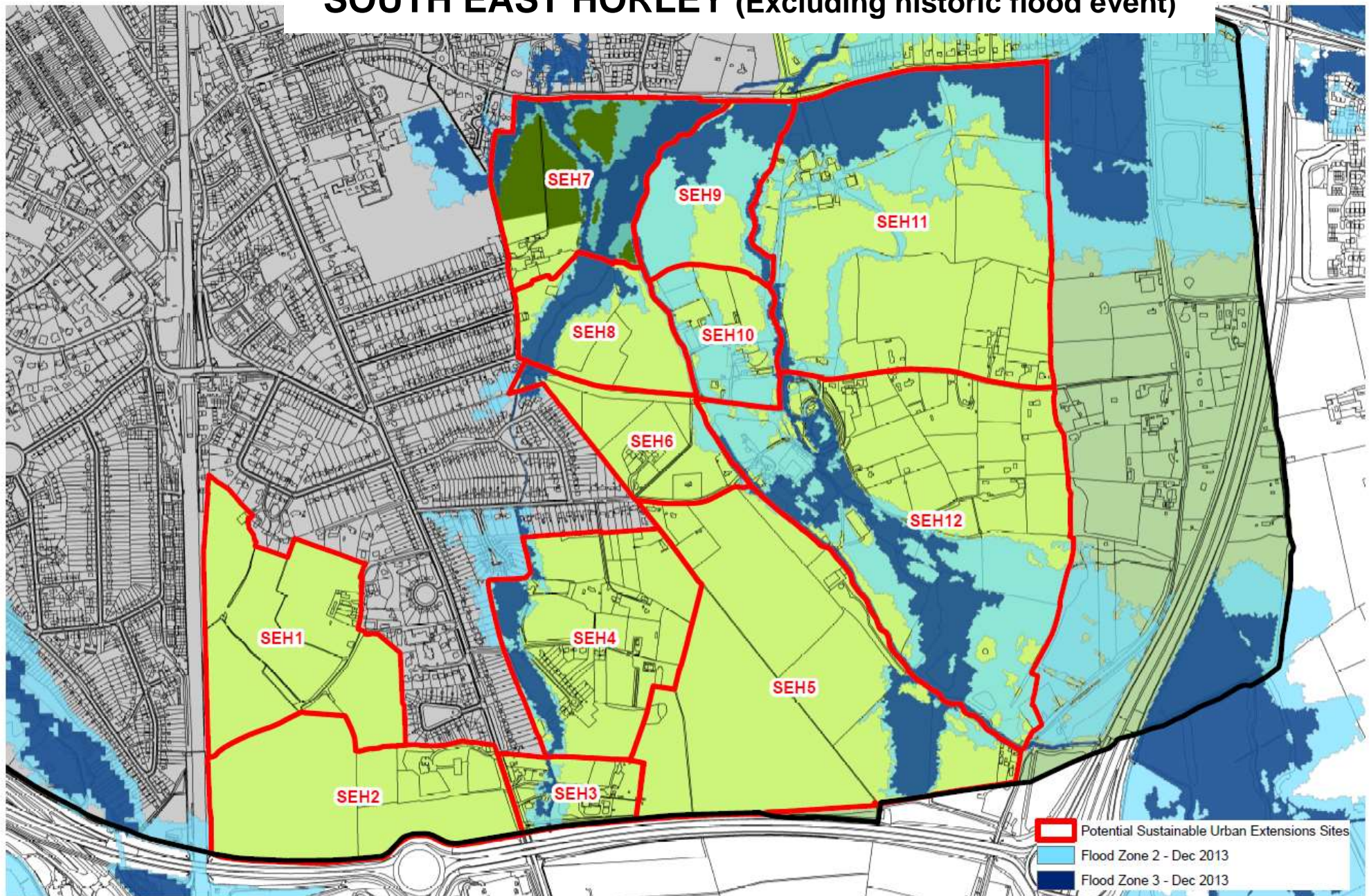
SOUTH EAST HORLEY (including historic flood event)



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