

Core Strategy Examination



**Sequential test for flood risk:
Addendum for Redhill town
centre**

December 2012

1. Background

Purpose

- 1.2 This paper summarises the outcomes of Sequential Testing, which has been carried out in relation to the spatial strategy for development set out in the Core Strategy, particularly in relation to Redhill town centre. This work responds to additional queries raised by the Inspector in respect of the Reigate & Banstead Core Strategy.
- 1.3 The paper builds upon Sequential Testing carried out previously for the Core Strategy (EP52), which tested all other proposed development locations established in Section 3 and Policy CS4 of the Core Strategy. The first section applies the Sequential Test to Redhill town centre as a broad strategic location for development in the context of the overall development strategy proposed for the borough.
- 1.4 The second part of the addendum presents the results of Sequential Testing of development sites within Redhill town centre. Whilst the Core Strategy does not make detailed allocations, opportunity sites have been identified through the Redhill Town Centre Area Action Plan (consultation draft 2011), which will be carried forward into the Development Management Policies (DMP) document. More detailed Sequential Testing has been carried out to build on the evidence in the RTCAAP Flood Risk Assessment 2011 (EP20 & EP21) and provide greater confidence that the scale and type of development proposed in Redhill can be sustainably accommodated.

The hierarchy of development and spatial approach to growth

- 1.5 The overall spatial strategy set out within the Core Strategy is focussed on delivering sustainable patterns of development which encourages economic prosperity, protects valued parts of the environment and ensures the community is supported by services and infrastructure. The hierarchy of development locations therefore seeks to focus growth in the urban area of the borough and in particular, in identified Regeneration Areas and the new neighbourhoods in Horley.
- 1.6 As the main town centre and most accessible location in the borough, Redhill town centre is one of the priority locations for growth and regeneration. This also accords with and reflects its status as a regional transport hub, primary regional centre and centre for significant change within the South East Plan.
- 1.7 Whilst Sustainability Appraisal (SA) of the proposed hierarchy (carried out at Preferred Options Stage) highlighted the need to address flood risk in Redhill and Horley in detail through subsequent DPDs, the proposed hierarchy of locations scored favourably through the SA process, particularly with regard to the efficient use of previously developed land, protecting the natural environment and reducing car usage.

2. Sequential Test of Redhill as a broad location for development

Introduction

- 2.1 Sequential Testing of the proposed development locations in the Core Strategy has previously been carried out and is summarised in an evidence paper (EP52) submitted alongside the Core Strategy. This paper did not however consider Redhill town centre and instead referred to Sequential Testing carried out in the Strategic Flood Risk Assessment for Redhill Town Centre (2011).
- 2.2 The primary purpose of this part of the Sequential Testing is to determine whether, as a broad location, development within Redhill town centre is sequentially appropriate.

The rationale for Redhill town centre

- 2.3 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.
- 2.4 As outlined above, the Redhill/Reigate area has been designated as a regional hub in the South East Plan (SEP). The SEP states that these areas should be the focus for investment in multi-modal transport infrastructure as well as regeneration, major retail and employment development and new market and affordable housing to support the creation of 'living centres'.
- 2.5 Given the specific role for Redhill and the need to address the challenges facing it, a number of vulnerable uses are important to the future growth and viability of the town centre. The specific need to locate these in Redhill town centre and consequently the rationale as to why no other locations can be considered reasonable alternatives, is discussed below:

Retail and leisure

- The SEP directs major retail growth to designated primary regional centres such as Redhill, which is also consistent with the SEP vision for regional hubs as set out above.
- The Retail and Leisure Needs Assessment (RLNA) 2011 identifies the need for around 25,800sqm of additional comparison retail floorspace to be developed in the borough by 2027 in order to maintain current market share. The report indicates that around 15,500sqm of this should be directed to Redhill Town Centre. Front loading of comparison retail provision in Redhill town centre is proposed in order to capture the benefits from inward investment and ensure that the town centre is more resilient to competition. The RLNA 2011 also identifies the need for 11,700sqm of additional convenience retail floorspace across the

borough by 2027 in order to maintain constant market position, around 7,000sqm¹ of which is directed to Redhill.

- None of the boroughs lower order centres are considered to have either the physical scope to expand, or could viably or sustainably accommodate retail development on such a large scale.
- **It is therefore necessary to direct this level of retail growth the Redhill Town Centre. Failure to do so would compromise regeneration of the town centre and would weaken its long-term competitiveness and viability as a retail destination.**

Residential

- 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, directing around 10% of this total to Redhill Town Centre. 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 Town Centre is likely to make an important contribution to housing supply.
- In addition to the positive contribution which the town centre can make to overall housing supply, residential development in Redhill town centre also supports other sustainability objectives. Residents would benefit from the highest levels of public transport accessibility in the borough and access to a wide range of services and facilities, reducing the need for private travel.
- Residential development also represents an important part of mixed-use development, having the potential to introduce greater critical mass and vibrancy into Redhill, which is consistent with the NPPF². 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 in the town centre - to come forward.
- **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 Redhill town centre.**

¹ Figure is a combined total for the Redhill/Reigate area. However, due to the character of Reigate town centre, there is limited scope to accommodate significant convenience retail provision and therefore the vast majority of growth is directed to Redhill town centre, where greater capacity and need for additional convenience retail exists.

² The National Planning Policy Framework explicitly encourages local planning authorities to recognise the role that residential development can play in ensuring the vitality of centres.

Offices

- Economic evidence produced to inform the Core Strategy identifies the need to plan for around 10,000sqm of additional office floorspace across the plan period in order to support forecast economic growth. As the focus for economic activity, the majority of office growth is distributed to the Redhill/Reigate hub, again reflecting its status as a regional hub, primary regional centre and centre for significant change. However, a number of constraints impact upon the ability of Reigate to physically accommodate significant growth, therefore the majority must be directed towards Redhill town centre.
- **In order to secure continued economic prosperity and ensure that employment development promotes sustainable patterns of growth, it is necessary to direct office growth to Redhill town centre. These uses will also help deliver the greater critical mass needed to support the regeneration and long-term viability of Redhill as a major centre.**

- 2.6 The discussion above demonstrates that it would not be possible to focus the growth proposed for Redhill 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.
- 2.7 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 town centre. For this reason, directing growth to Redhill town centre is concluded to be sequentially appropriate.
- 2.8 A sequential approach to site allocations and the distribution of uses across the identified town centre sites should be demonstrated through the Development Management Policies DPD, with reference to the outcomes of the detailed sequential test set out below where relevant. Where necessary, the Exception Test must be satisfied.

Managing flood risk

- 2.9 The Council is exploring opportunities to manage flood risk and reduce the threat and likelihood of flooding within the town centre. A two-pronged approach adopted explores both the opportunity for potential flood storage upstream and the provision of on-site flood mitigation and storage options.
- 2.10 Upstream flood storage is an option for potentially reducing the flood levels in the town centre, which could enable the envisaged development. The SFRA for Redhill identified the potential for upstream storage on two areas/sites, which set the marker for further detailed studies. This includes Memorial Park and the Moors to the east of the town centre. Memorial Park is the first option for exploration given its town centre location, being Council owned, and its potential to provide natural flood storage.

2.11 Policy guidance requiring the exploration of on-site mitigation measures and flood storage is set out in the RTCAAP consultation draft. The Council has a number of sites in its ownership including Marketfield Way site. The Council has explored and scoped out the potential flood mitigation measures and storage options required to enable development on this site. Further details will be provided through a detailed flood risk assessment when planning permission is sought.

3. Detailed Sequential Test of town centre development opportunities

Introduction

- 3.1 The Council has been progressing work to prepare an Area Action Plan (AAP) for Redhill town centre with the most recent draft of the document consulted upon in early 2012. This consultation draft identified a number of potential sites where development was considered to be a realistic prospect and identified the uses considered to be deliverable on each site.
- 3.2 Jacobs Ltd was commissioned by the Council to prepare a Level 2 Strategic Flood Risk Assessment (SFRA) for Redhill to support the draft AAP. The SFRA establishes that there is an extensive flood risk area in the town centre owing to the confluence of both fluvial and surface water events, with particular implications for the northern and western parts of the town centre. This flood risk environment places limitations on the scope for the town centre to meet future development needs and support regeneration whilst directing development away from areas that are susceptible to flooding.
- 3.3 Whilst detailed site allocations will not be included within the Core Strategy, the following section takes these proposed development sites through the Sequential Test, and where necessary the first stage of the Exception Test, to provide additional confidence that growth can be delivered in Redhill town centre in a sustainable way that is consistent with the requirements of the NPPF and its supporting Technical Guidance.
- 3.4 This section of the Sequential Test is carried out on the basis that maximum capacity is pursued on each site to contribute to delivery of growth identified for the town centre and to support its regeneration (i.e. sites are developed at optimum site coverage and density). The development capacity against which sites have been assessed is set out in Table 2.
- 3.5 The Sequential Test is informed by flood zone mapping contained within the Level 2 Strategic Flood Risk Assessment (SFRA) carried out by Jacobs Ltd. Mapping 375 minute (fluvial) and 60 minute (surface water) events at depths greater than 50mm are used to represent full risk. Annex A provides an overview map showing identified sites overlaid onto the SFRA flood zone mapping.

- 3.6 Each site has been taken through a Sequential Test questionnaire, which can be found in Annex C.

Summary of the Sequential Test of the development sites

- 3.7 The pool of opportunity sites in Redhill town centre is limited due to the physically constrained town centre and the availability and deliverability of sites. As a result, there are no other reasonably available alternatives to those sites identified in the draft AAP that would be deliverable in comparable timescales. In addition, all sites contained within the draft AAP were assessed in the Sequential Test as alternatives to each other. Additional sites in lower flood risk zones will be considered for the development currently allocated to sites in higher risk should they come forward during the preparation of the Development Management Policies document.
- 3.8 Whilst there are potentially alternative combinations for the distribution of uses amongst those sites identified, the needs of particular development types in respect of location, town centre sequential preference and site size means that the scope to direct certain uses to different locations or sites is restricted. Each of the sites identified within the town centre play a specific role in achieving the spatial strategy for the town centre and delivering the regeneration objectives and benefits. For example, the provision of retail is essential to secure the town centre's long-term competitiveness and viability as a retail destination, which is considered key to the regeneration of the town centre. 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.
- 3.9 Whilst greater flexibility will be available to shuffle more vulnerable uses to sites in lesser risk should additional sites come forward, 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 the town centre to which each of these sites contribute. Nor is there significant scope to increase development on lesser flood risk sites to enable higher risk sites to be avoided without making development unacceptable with respect to other planning requirements (e.g. density, fit with character, neighbour amenity). The Exception Test in addition to the detailed flood risk assessment will support higher risk sites in flood zone 3.
- 3.10 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 regeneration of the town centre. A detailed flood risk assessment with flood mitigation measures and the Exception Test will accompany each of these sites 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.

- 3.11 The Sequential Test is therefore particularly important in determining whether proposed development is appropriate with respect to the flood risk environment for each site and identifying whether development can be directed to lesser risk parts of the site and whether it will be necessary to carry out and satisfy the Exception Test.

Wholly or predominantly in Flood Zone 1 (refer to Table 1 and Annex C for further detail)

- 3.12 None of the sites assessed fall wholly within Flood Zone 1. However, there are a number of sites that predominantly fall in Flood Zone 1 where the proposed development can be accommodated on the parts of the site without encroaching developing higher risk flood areas:
- Redstone Hill
 - Warwick Quadrant North
 - Warwick Quadrant South
 - Royal Mail Depot, St Annes Drive
 - Former Crown Buildings, London Road

Partly, substantially or wholly in Flood Zones 2 and 3 (refer to Table 1 and Annex C for further detail)

- 3.13 The Sequential Test concludes that four further sites have proposed uses that are either compatible with the flood environment across the site or can be directed to those parts of the site where compatibility can be demonstrated. These include:
- Former Liquid and Envy Site
 - Reading Arch Road Site
 - Cromwell Road
 - Memorial Park
- 3.14 For three of the sites examined, the Sequential Test concludes that the Exception Test would need to be carried out if the proposed optimal development aspirations are pursued as – on each site - this would require the development of ‘more vulnerable’ uses in Zones 3a. These are:
- Former Longmead Block
 - Gloucester Road
 - Colebrook

The flood mitigation measures could 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. The exploration of upstream storage can also be complementary to the on-site flood mitigation measures necessary for each of these sites. Details of such measures will be provided through detailed flood risk assessments when planning permission is sought.

- 3.15 The preparation of the Core Strategy and subsequent Local Plan documents must be based on robust evidence depicting deliverable development

aspirations. Without undertaking the Exception Test and without the benefit of detailed site-specific flood risk assessments, it is difficult to provide certainty and confidence at this stage that maximum capacity could be achieved on these sites. However, given the flood risk environment on these sites, the Sequential Test identifies that it would be possible to avoid the need to develop 'more vulnerable' uses on incompatible zones (i.e. Flood Zone 3a and 3b) by reducing the scale of development and adopting a more conservative capacity and subsequently directing remaining development to Zones 1 and 2. Table 2 explores the concept of reducing development capacity in order to satisfy flood risk compatibility. This conservative approach was adopted in the 2012 SHLAA to provide greater certainty over the deliverability of housing.

- 3.16 In the case of two sites, Marketfield Way and Station Site and Car Park, the Sequential Test identifies that it is unlikely to be feasible to avoid the need for some development in higher risk flood zones.
- 3.17 For both sites, development would not be appropriate in Flood Zone 3b and it will therefore be necessary to not develop on these parts of the site or to modify the risk zones across the sites through on site attenuation³. For Marketfield Way, appropriate works have been scoped and agreed in principle by the Environment Agency. However, even doing so would mean that some development on Zones 3a would be necessary in both cases.
- 3.18 Given the need to maximise development on these marquee sites from the perspective of both regeneration and viability, it is unlikely to be feasible for further parts of the site 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.

³ In accordance with the recommendations (Section 7.2) of the Redhill Town Centre Area Action Plan Strategic Flood Risk Assessment 2011 and explained further in Annex A: Sequential approach.

Table 1: Sequential Test summary for development sites – optimum capacity

Proposed Site	FZ1	FZ2	FZ3a	FZ3b	Proposed Uses	Vulnerability	Development Sequentially Compatible?
Redstone Hill	Yes	Yes	Yes	Yes	Car parking	Less vulnerable	Yes – site affected only to a limited extent by higher risk flood zones. Development proposed could be accommodated on site without encroaching upon higher risk zones.
Warwick Quadrant North	Yes	Yes	Yes	Yes	Hotel Retail (shops) Gym	More vulnerable Less vulnerable Less vulnerable	Yes - site affected only to a limited extent by higher risk flood zones. Development proposed could be accommodated on site without encroaching upon higher risk zones. Planning permission has been granted with necessary flood mitigation measures agreed
Warwick Quadrant South	Yes	Yes	Yes	No	Retail (shops)	Less vulnerable	Yes - site affected only to a limited extent by higher risk flood zones. Development proposed could be accommodated on site without encroaching upon higher risk zones.
Royal Mail Depot	Yes	Yes	Yes	Yes	Residential Offices	More vulnerable Less vulnerable	Yes - site affected only to a limited extent by higher risk flood zones. Optimum development could be accommodated on site without encroaching upon higher risk zones.
Former Crown Buildings	Yes	Yes	No	No	Residential Offices	More vulnerable Less vulnerable	Yes - site affected only to a limited extent by higher risk flood zones. Optimum development could be accommodated on site without encroaching upon higher risk zones.
Former Liquid and Envy	Yes	Yes	Yes	Yes	Residential Retail (shops)	More vulnerable Less vulnerable	Yes - site affected only to a limited extent by higher risk flood zones. Development proposed could be accommodated on site without encroaching upon higher risk zones. Planning permission has been granted with necessary flood mitigation, design and access and egress measures agreed
Reading Arch Road	Yes	Yes	Yes	Yes	Retail (shops)	Less vulnerable	Yes - site affected only to a limited extent by higher risk flood zones. Optimum development could be accommodated on site without encroaching upon higher risk zones.
Cromwell Road	Yes	Yes	No	No	Retail (shops)	Less vulnerable	Yes – site affected only to a limited extent by higher risk flood zones. Proposed uses are compatible with these zones.
Memorial Park	Yes	Yes	Yes	Yes	Café Outdoor recreation	Less vulnerable Water compatible	Yes – ‘less vulnerable’ uses could be directed to parts of the site where the flood zone is compatible and the recreation use is compatible in all zones.
Former Longmead Block	Yes	Yes	Yes	Yes	Residential Community facilities	More vulnerable More vulnerable	Exception Test Required – Optimum development could not be accommodated on site without encroaching upon flood zones which are incompatible with the uses proposed. Development could be directed away from Zones 3a if

							development capacity is reduced (see Table 2). In this instance the Exception Test would not be required.
Gloucester Road	Yes	Yes	Yes	Yes	Residential Offices	More vulnerable Less vulnerable	Exception Test Required – Optimum development could not be accommodated on site without encroaching upon flood zones which are incompatible with the uses proposed. Development could be directed away from Zones 3a if development capacity is reduced (see Table 2). In this instance the Exception Test would not be required.
Colebrook	Yes	Yes	Yes	Yes	Residential Community facilities	More vulnerable More vulnerable	Exception Test Required – Optimum development could not be accommodated on site without encroaching upon flood zones which are incompatible with the uses proposed. Development could be directed away from Zones 3a if development capacity is reduced (see Table 2). In this instance the Exception Test would not be required.
Station Site and Car Park	Yes	Yes	Yes	Yes	Residential Retail (shops) Rail station	More vulnerable Less vulnerable <i>Essential infrastructure</i>	Exception Test Required – Optimum development could not be accommodated on site without encroaching upon flood zones which are incompatible with the proposed uses. On site attenuation works would enable flood zones across the site to be modified and Flood Zone 3b to be avoided.
Marketfield Way	No	Yes	Yes	Yes	Residential Retail (shops) Restaurants Cinema	More vulnerable Less vulnerable Less vulnerable Less vulnerable	Exception Test Required – Optimum development could not be accommodated on site without encroaching upon flood zones which are incompatible with the proposed uses. On site attenuation works would enable flood zones across the site to be modified and Flood Zone 3b to be avoided.

The Exception Test

- 3.19 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.
- 3.20 The Sequential Test has identified a number of sites where it is or may be necessary to satisfy the Exception Test if a particular level of development is pursued. These are:
- Former Longmead Block
 - Gloucester Road
 - Colebrook
 - Station Site and Car Park
 - Marketfield Way
- 3.21 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, informed by a Strategic Flood Risk Assessment where one has been prepared; 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.
- 3.22 Section 2 above contains a detailed analysis of the rationale for, and benefits of, developing in Redhill town centre. Particular sustainability benefits include:
- Making efficient use of previously developed land and reducing the need to develop on greenfield sites
 - Promoting sustainable travel by locating development in the most accessible locations and delivering multi-modal infrastructure improvements
 - Supporting economic prosperity through accessible job creation
 - Delivering the regeneration of Redhill town centre by:
 - Securing physical and townscape improvements and reducing opportunities for crime and anti-social behaviour
 - Promoting its role as a competitive and viable retail and commercial centre
 - The exploration of potential flood alleviation scheme in the form of upstream flood storage could also contribute positively to the town centre and areas further down stream.
- 3.23 On the basis of Section 2 and the specific points above, the Council considers that criterion a) has been satisfied. For individual sites, criterion b) must be evidenced by the developer to the satisfaction of both the Council and the Environment Agency.

Table 2: Optimum capacity v reduced capacity

Site	Optimum development		Reduced development		
	Total Site area (ha)	Capacity	Site area (ha) outside Z3a	Capacity	Is reducing capacity a realistic option?
Redstone Hill	1.42	Car parking (N/A)	N/A – For these sites, maximum capacity can be pursued in a way which is compatible with the extent of flood risk.		
Warwick Quadrant North	1.27	5,000sqm retail 3,200sqm hotel 1,600sqm gym			
Royal Mail Depot	0.55	120 residential			
Former Crown Buildings	0.43	15 residential 5,200sqm offices			
Former Liquid and Envy	0.29	50 residential 800sqm retail			
Reading Arch Road	1.90	8,500sqm retail			
Cromwell Road	0.97	3,000sqm retail			
Former Longmead Block	0.22	30 residential 1,200sqm community	0.16	25 residential 1,200sqm community	Yes – For these sites, reducing development capacity is considered to be a realistic option. Whilst important, the exact scale of development proposed on these sites is not critical to the overall regeneration of the town centre or viability.
Gloucester Road	0.76	120 residential	0.54	65 residential	
Colebrook	1.30	160 residential	1.08	105 residential	
Station Site and Car Park	0.90	155 residential 3,000sqm retail	0.70	120 residential 3,000sqm retail	No – The development on Station Site and Car Park is necessary to meet the need for retail floorspace and residential units within the town centre and facilitate wider regeneration benefits. The scale of development is also critical to the overall viability of the scheme given the abnormal costs associated with station enhancements. It is also not possible to relocate the station entrance from its existing location. Deviating from optimal capacity is therefore unrealistic. On-site attenuation works may be necessary to enable development by modifying the flood zones across the site – this would effectively remove it from Zone 3b.

Marketfield Way	0.65	21 residential 4,400sqm retail 3,500sqm leisure	0.10	N/A	<p>No – The level of development on Marketfield Way is necessary to meet need for retail and leisure floorspace within the town centre and is pivotal to the overall regeneration vision for Redhill. Proposed residential uses at upper floors are necessary to secure a viable scheme which is acceptable to development partners. Deviating from optimal capacity is therefore unrealistic. On-site attenuation works would be necessary to enable development by modifying the flood zones across the site and effectively remove it from Zone 3b. Beyond this, further restricting development to avoid land within Zone 3a would virtually preclude development altogether.</p>
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Annex A: Town Centre Flood Risk Maps

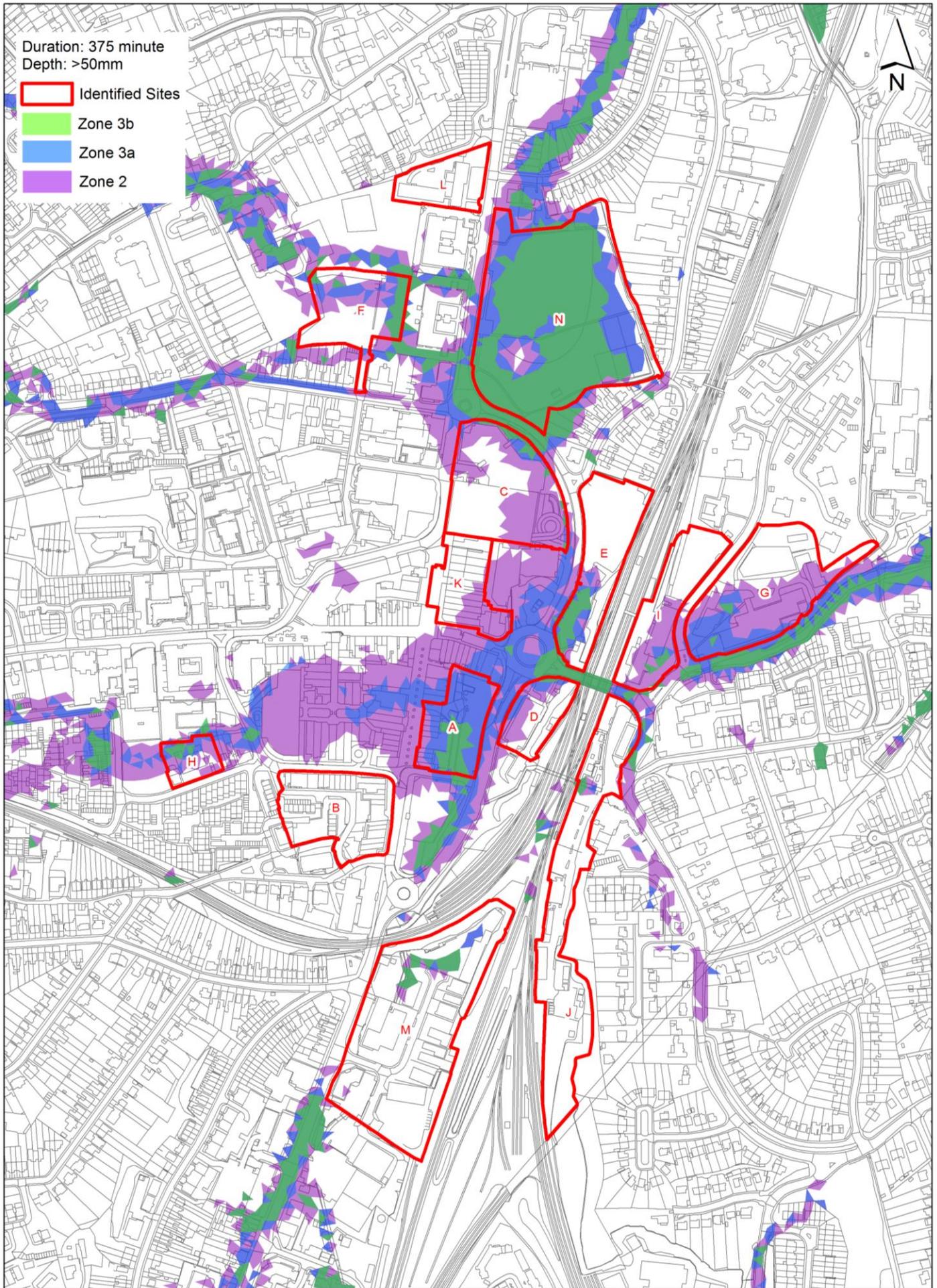
Schedule of Sites

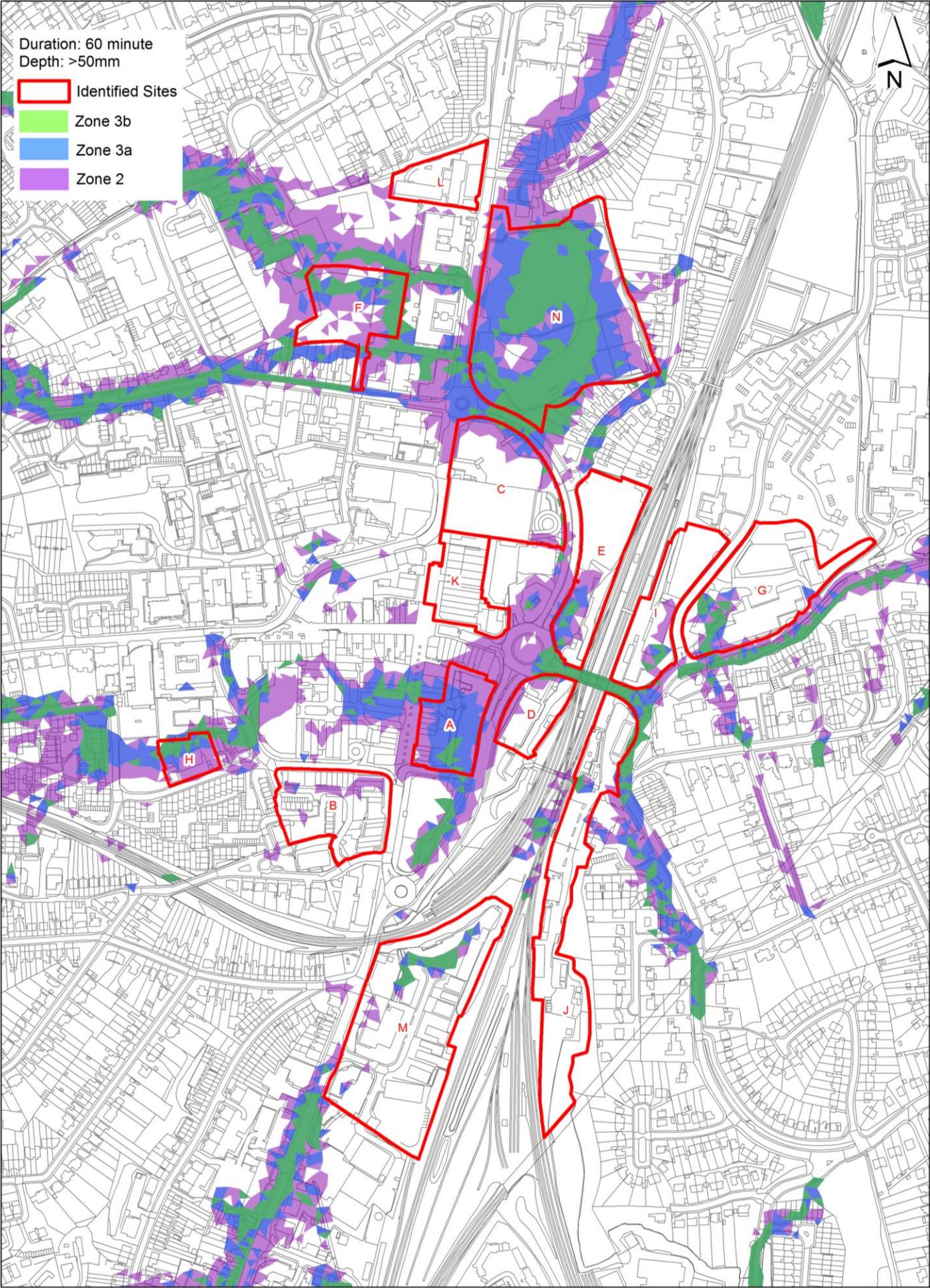
Ref	Site Name
A	Marketfield Way
B	Cromwell Road
C	Warwick Quadrant North
D	Former Liquid and Envy
E	Station Site and Car Park
F	Gloucester Road Car Park
G	Colebrook
H	Former Longmead Centre
I	Royal Mail Depot
J	Redstone Hill
K	Warwick Quadrant South
L	Former Crown Buildings
M	Reading Arch Road
N	Memorial Park

Note:

375 minute event represents fluvial flood risk

60 minute event represents surface water flood risk





Annex B: Sequential Test Questionnaire

1. Are the proposed sites wholly in 'Flood Zone 1 – Low Probability' of flood risk?	
Yes	<p>Sites wholly in Flood Zone 1:</p> <p>None</p> <p>Sites predominantly in Flood Zone 1 where development can be accommodated without encroachment into Zones 2 and/or 3 include:</p> <p><u>Redstone Hill:</u> Largely in FZ1 but a small part of the site around the subway is within FZ2, FZ3a and FZ3b.</p> <p><u>Warwick Quadrant North:</u> Largely in FZ1. A small portion at the northern part of the site is within FZ2 and a smaller portion in FZ3a and FZ3b. Planning permission has been granted for the redevelopment of this site with necessary flood mitigation measures agreed.</p> <p><u>Warwick Quadrant South:</u> Largely in FZ1. The eastern part of the site (bus station area) is within FZ3a with parts in FZ2; however, no development is planned for this part.</p> <p><u>Royal Mail Depot:</u> Largely in FZ1. A small area in the south-east of the site fronting onto St. Anne's Drive is affected by FZ2, 3a and 3b.</p> <p><u>Crown Buildings:</u> Largely in FZ1. Only very minor incursion of FZ2 on the southern boundary of the site.</p> <p>For these sites wholly in Flood Zone 1 or predominantly in Flood Zone 1 where development can be accommodated without encroaching on higher risk zone, all development types area appropriate and there is no need to proceed further with the Sequential Test.</p>
No	<p>Sites in partly, substantially or wholly in Zones 2 and 3</p> <p><u>Longmead:</u> Majority of the site in FZ2 with area of the site along the northern border in FZ3a and FZ3b.</p> <p><u>Marketfield Way:</u> Majority of the site is in FZ3a and a significant portion of the south of the site is in FZ3b. The western edge of the site is the only part in FZ2.</p> <p><u>Memorial Park:</u> Majority of the site is in FZ3b with the fringes in FZ3a. There is a small island in the centre of the site in FZ1.</p> <p><u>Gloucester Road:</u> Majority of site in FZ2 with areas around the eastern and northern boundaries in FZ3a and FZ3b.</p> <p><u>Colebrook:</u> The majority of the south-eastern part of the site (around junction of Noke Drive/St. Anne's Drive) is within Z3a with some fringe areas in FZ2 and FZ3b.</p> <p><u>Station car park:</u> Southern half of the site predominantly in FZ3a and FZ3b.</p> <p><u>Cromwell Road:</u> Small pockets throughout the site within FZ2</p> <p><u>Reading Arch Road:</u> Parts of the north of the site in FZ2, FZ3a and FZ3b.</p> <p><u>Liquid & Envy:</u> Areas along the northern and western boundaries of the site fall within FZ2, FZ3a and FZ3b.</p> <p>For sites in Flood Zones 2 and 3 proceed to Question 2.</p>

2. Could the following 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 Liquid & Envy - The proposed development seeks to retain the existing façade and will therefore not encroach on FZ2 or FZ3. The proposed development can therefore be accommodated on parts of the site, which fall within FZ1 without the need to encroach upon FZ2. However, access to the site is affected by FZ3 to the northern part of the site.
 Planning permission was granted on this site having agreed on the necessary design requirements and mitigation measures to enable safe access and structure.

Memorial Park – Yes – Part of the café could be moved.

No 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.
 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. Therefore, no sites outside of the town centre can be considered to be 'reasonable alternatives' in delivering these objectives.

Growth of the town centre is also physically restricted by the rail tracks to the immediate east and south and established residential and office uses to the north and west. This has an impact on the amount of development sites that are available. As a result, each of the sites identified within the town centre are 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. Further consideration will be given to additional sites in lesser flood risk zones, should they come forward during the preparation of the Development Management Policies DPD.

- Longmead Site
 There is limited site availability coupled with the identified need for the provision of community facilities in the town centre. This site presents the opportunity for redevelopment, having been vacant for a number of years and is very close to the town centre to contribute positively and ensure the facilities are easily accessible to all. There are no other available town centre sites to deliver this or offer the location benefits. The provision of a subordinate element of residential use would be necessary to secure a viable, deliverable scheme.
- Marketfield Way Site

This site occupies a key position⁴ within the primary shopping area and is therefore vital and sequentially⁵ preferable for the delivery of a large proportion of the necessary comparison retail growth within the town centre. The same would apply for the leisure uses proposed on this site. The provision of a subordinate element of residential use would be necessary to secure a viable, deliverable scheme. Development on this site could not therefore be accommodated on or redirected to land within FZ1.

- Memorial Park

Memorial Park is already in use as outdoor amenity and recreation space. Given the limited availability of open space in the town centre there are no reasonable alternatives for redirecting such uses to an area of lower flood risk. The café serves as a focus for the park and an additional feature to attract more users. Memorial Park also offers the provision of enhanced outdoor playing facilities. These facilities including the café cannot be relocated elsewhere.

- Gloucester Road Car Park

Gloucester Road represents one of the most suitable options for the provision of additional employment floorspace within the town centre. The site lies in a transition zone between the existing business area and residential hinterland. The site therefore represents a natural progression for the provision of both employment and residential uses. Development on this site could not therefore be accommodated on or redirected to land within FZ1.

- Colebrook Site

This site presents a realistic opportunity for redevelopment, as the need for community service provision from the site has fallen in recent years. 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.

- Station Site and Car Park

Redevelopment of the station site is essential to support delivery of an enhanced multi-modal transport interchange and provide new station facilities. Given the location of the site in relation to the town centre, it also represents a realistic opportunity to contribute to the need for retail floorspace as well as residential uses. Inclusion of enabling uses such as these would also be necessary from a viability perspective in order to fund station enhancements. Development on this site could not therefore be accommodated on or redirected to land within FZ1 and cannot be located elsewhere due to the location of and the planned improvements for the station.

- Cromwell Road

Although the majority of the site is in flood zone 1, parts of the site affected by flood zone 2 are dispersed across the site instead of being concentrated in a

⁴ It is located on the high street and opposite the Belfry shopping centre, which serves the population with comparison retail at present. This location would capitalize on the footfall.

⁵ Based on NPPF sequential approach for retail site identification.

discrete area. The latter would have enabled the proposed development to be built around the flood zone 2 area.

The site comprises poor quality housing and commercial development and makes little contribution to the town centre environment. Redevelopment of the site presents the opportunity to bring about positive enhancements to the southern gateway of the town centre. Given the location of the site, it is one of only few sequentially preferable locations for the provision of large scale retail floorspace. Development on this site could not therefore be accommodated on or redirected to land within FZ1.

- Reading Arch Road

Although the majority of the site is in flood zone 1, parts of the site affected by flood zones 3b, 3a and 2 are dispersed across the site instead of being concentrated in a discrete area. The latter would have enabled the proposed development to be built around these flood zones.

Given the constrained nature of the town centre, growth opportunities 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 the long term growth of the centre. Development on this site could not therefore be accommodated on or redirected to land within FZ1.

Identify alternative sites that were considered and explain why they were dismissed.

Development of all of the identified sites is required in order to deliver the scale of development required in the town centre. Whilst some of the sites within the town centre could be considered to be alternatives to one another, other sites are critical for the delivery of specific uses based on their location, sequential preference, site size and relation to the regeneration objectives, for example:

- Marketfield Way – sequentially preferable for large scale comparison retail within PSA
- Station site – location for station improvements and creation of multi
- Cromwell Road – convenience retail
- Warwick Quadrant north – convenience retail

- 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:	
<ul style="list-style-type: none"> • <u>Longmead Site</u>: Community facilities; Residential • <u>Marketfield Way Site</u>: Retail (shops); Leisure (restaurants, cafes, cinema); Residential • <u>Memorial Park</u>: Leisure (café); Outdoor amenity and recreation • <u>Gloucester Road</u>: Residential; Offices • <u>Colebrook</u>: Community facilities; Residential; extra care homes • <u>Station car park</u>: Retail (supermarket and shops); Residential • <u>Cromwell Road</u>: Retail (supermarket and shops) • <u>Reading Arch Road</u>: Retail (shops) 	
b. Are the proposed uses in the 'Water Compatible', 'Less Vulnerable', 'More Vulnerable', or 'Essential Infrastructure' Flood Risk Vulnerability Classifications set out in Table 2 of NPPF Technical Guidance	
Yes	<p>List the proposed uses in these classifications:</p> <p><u>Longmead</u> <i>More vulnerable</i> – Residential, non-residential uses for health services, nurseries and educational establishments (i.e. community facilities)</p> <p><u>Marketfield Way</u> <i>More vulnerable</i> – Residential <i>Less vulnerable</i> – Retail (shops); Leisure</p> <p><u>Memorial Park</u> <i>Water compatible</i> – amenity open space, outdoor sports and recreation</p> <p><u>Gloucester Road</u> <i>More vulnerable</i> – Residential <i>Less vulnerable</i> – Offices</p> <p><u>Colebrook</u> <i>More vulnerable</i> – Residential, non-residential uses for health services, nurseries and educational establishments (i.e. community facilities)</p> <p><u>Station site</u> <i>More vulnerable</i> – Residential <i>Less vulnerable</i> – Retail (supermarket and shops)</p> <p><u>Cromwell Road</u> <i>Less vulnerable</i> – Retail (supermarket and shops)</p> <p><u>Reading Arch Road</u> <i>Less vulnerable</i> – Retail (shops)</p> <p><i>These proposals are appropriate if located in Flood Zone 2 and there is no need to proceed with the Exception Test.</i></p>
No	<p>List the proposed uses not in these classifications:</p> <p>There are no 'highly vulnerable' uses planned on any of the identified sites.</p> <p><i>For these proposed uses proceed to Question 3c.</i></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?

Yes	Identify how the risks have been reduced: N/A – no highly vulnerable development types are proposed <i>No need to proceed with the Exception Test.</i>
No	Explain why the development types cannot be relocated: <i>Proceed to the Exception Test.</i>

4. For sites in 'Zone 3a High Probability' of flood risk.	
a. Proposed uses for the entire site:	
<ul style="list-style-type: none"> • <u>Longmead Site</u>: Community facilities; Residential • <u>Marketfield Way Site</u>: Retail (shops); Leisure (restaurants, cafes, cinema); Residential • <u>Memorial Park</u>: Leisure (café); Outdoor amenity and recreation • <u>Gloucester Road</u>: Residential; Offices • <u>Colebrook</u>: Community facilities; Residential (including extra care) • <u>Station car park</u>: Retail (shops and supermarket); Residential • <u>Cromwell Road</u>: Retail (supermarket and shops) • <u>Reading Arch Road</u>: Retail (shops) 	
b. Could the following proposed development on sites in Flood Zones 3a alternatively be located on sites in 'Flood Zone 2 Medium Probability' of flood risk:	
Yes	None
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 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>
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><u>Marketfield Way</u> <i>Less vulnerable</i> – Retail (shops); Leisure</p> <p><u>Memorial Park</u> <i>Water compatible</i> – amenity open space, outdoor sports and recreation</p> <p><u>Gloucester Road</u> <i>Less vulnerable</i> – Offices</p> <p><u>Station site</u> <i>Less vulnerable</i> – Retail (shops)</p> <p><u>Cromwell Road</u> <i>Less vulnerable</i> – Retail (supermarket and shops)</p> <p><u>Reading Arch Road</u> <i>Less vulnerable</i> – Retail (shops)</p> <p><i>These proposals are sequentially appropriate in Flood Zone 3a and there is no need to proceed with the Exception Test. It will be necessary to prepare a Flood Risk Assessment for these developments and consideration should be made early in the planning process with respect to flood risks, mitigation and egress/access considerations.</i></p>

<p>No</p>	<p>List the proposed uses not in these classifications:</p> <p><u>Longmead</u> <i>More vulnerable</i> – Residential, non-residential uses for health services, nurseries and educational establishments (i.e. community facilities)</p> <p><u>Marketfield Way</u> <i>More vulnerable</i> – Residential</p> <p><u>Gloucester Road</u> <i>More vulnerable</i> – Residential</p> <p><u>Colebrook</u> <i>More vulnerable</i> – Residential, non-residential uses for health services, nurseries and educational establishments (i.e. community facilities)</p> <p><u>Station site</u> <i>More vulnerable</i> – Residential <i>Essential infrastructure</i> - Station</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>	
<p>Yes</p>	<p>Identify how the risks could be reduced:</p> <p>With reference to Section 7.2 of the Redhill TC SFRA, the following measures could be taken to reduce the risk of flooding to more sensitive development types on the following sites:</p> <p><u>Longmead Site</u> Development capacity of the site could be reduced. This would enable vulnerable uses (residential) to be accommodated only on those areas where their vulnerability is compatible with the level of flood risk (i.e. FZ2 or FZ1). This approach has been adopted within the Council’s latest SHLAA to provide certainty in housing numbers deliverable.</p> <p><u>Gloucester Road Car Park</u> Development capacity of the site could be reduced. This would enable vulnerable uses (residential) to be accommodated only on those areas where their vulnerability is compatible with the level of flood risk (i.e. FZ2 or FZ1). This approach has been adopted within the Council’s latest SHLAA to provide certainty in housing numbers deliverable.</p> <p><u>Colebrook Site</u> Development capacity of the site could be reduced. This would enable vulnerable uses (residential) to be accommodated only on those areas where their vulnerability is compatible with the level of flood risk (i.e. FZ2 or FZ1). This approach has been adopted within the Council’s latest SHLAA to provide certainty in housing numbers deliverable.</p> <p><i>Provided this approach is taken, there is no need to proceed with the Exception Test. It will be necessary to prepare a Flood Risk Assessment for these developments and</i></p>

	<i>consideration should be made early in the planning process with respect to flood risks, mitigation and egress/access considerations.</i>
No	<p>Explain why the development types cannot be relocated:</p> <p>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 the town centre to which each of these sites contribute. There is also 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). Further consideration will be given to additional sites in lesser flood risk zones, should they come forward during the preparation of the Development Management Policies DPD.</p> <p><u>Station Site:</u> Yes, developers have worked up schemes with the more vulnerable residential uses 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. The rail station (essential infrastructure) cannot be relocated.</p> <p><u>Marketfield Way:</u> 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> <p><i>Proceed to the Exception Test (required for both sites)</i></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> <p><i>Provided this approach is taken, there is no need to proceed with the Exception Test. It will be necessary to prepare a Flood Risk Assessment for these developments and consideration should be made early in the planning process with respect to flood risks, mitigation and egress/access considerations.</i></p>
No	<i>This development proposal is not appropriate within this Flood Zone and should not normally be permitted.</i>

5. For sites in 'Zone 3b The Functional Floodplain'.	
a. Proposed uses for the entire site:	
<ul style="list-style-type: none"> • <u>Longmead</u>: Community facilities; Residential • <u>Marketfield Way Site</u>: Retail (shops); Leisure (restaurants, cafes, cinema); Residential • <u>Memorial Park</u>: Leisure (café); Outdoor amenity and recreation • <u>Gloucester Road</u>: Residential; Offices • <u>Colebrook</u>: Community facilities; Residential; extra care homes • <u>Station Car Park</u>: Retail (shops and supermarket); Rail Station • <u>Reading Arch Road</u>: Retail (shops) 	
b. Can the development proposals be redirected to 'Zone 3a High Probability'?	
Yes	
No	<p>Explain why the development proposals cannot be redirected:</p> <p>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 the town centre to which each of these sites contribute. 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). Further consideration will be given to additional sites in lesser flood risk zones, should they come forward during the preparation of the Development Management Policies DPD.</p> <p><i>Proceed to Question 5c.</i></p>
c. Is the development proposal in the 'Water Compatible' classification set out in Table 2 of NPPF Technical Guidance	
Yes	<p><u>Memorial Park</u> <i>Water compatible</i> – Outdoor amenity and recreation</p> <p><i>These proposals are sequentially appropriate in Flood Zone 3b and there is no need to proceed with the Exception Test.</i></p>
No	<p><u>Longmead</u> <i>More vulnerable</i> – Residential, non-residential uses for health services, nurseries and educational establishments (i.e. community facilities)</p> <p><u>Marketfield Way</u> <i>More vulnerable</i> – Residential <i>Less vulnerable</i> – Retail (shops); Leisure</p> <p><u>Gloucester Road</u> <i>More vulnerable</i> – Residential <i>Less vulnerable</i> – Offices</p> <p><u>Colebrook</u> <i>More vulnerable</i> – Residential, non-residential uses for health services, nurseries and educational establishments (i.e. community facilities)</p> <p><u>Station site</u> <i>More vulnerable</i> – Residential <i>Less vulnerable</i> – Retail (supermarket and shops)</p>

	<p><i>Essential infrastructure</i> – Rail station <u>Reading Arch Road</u> <i>Less vulnerable</i> – Retail (shops)</p> <p><i>Proceed to Q5d and 5e</i></p>
<p>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?</p>	
Yes	<p>Identify how the risks could be reduced:</p> <p><i>Proceed to the Exception Test</i></p>
No	<p>N/A</p> <p><i>Proposals for ‘essential infrastructure’ in Zone 3b may be appropriate – proceed with the Exception Test.</i></p>
<p>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?</p>	
Yes	<p>Identify how the risks could be reduced:</p> <p>With reference to Section 7.2 of the Redhill TC SFRA, the following measures could be taken to reduce the risk of flooding to more sensitive development types on the following sites:</p> <p>The Council is exploring opportunities to manage flood risk and reduce the threat and likelihood of flooding within the town centre. A two-pronged approach adopted explores both the opportunity for potential flood storage upstream and the provision of on-site flood mitigation and storage options.</p> <p>Upstream flood storage is an option for potentially reducing the flood levels in the town centre, which could enable the envisaged development. The SFRA for Redhill identified the potential for upstream storage on two areas/sites, which set the marker for further detailed studies. This includes Memorial Park and the Moors to the east of the town centre. Memorial Park is the first option for exploration given its town centre location, being Council owned, and its potential to provide natural flood storage.</p> <p>Policy guidance requiring the exploration of on-site mitigation measures and flood storage is set out in the RTCAAP consultation draft. The following potential mitigation measures are identified for these sites:</p> <p><u>Marketfield Way</u> On site attenuation works would enable Flood Zones across the site to be altered. Proposed measures (which have been agreed in principle with the EA) would essentially alter those parts of the site currently in FZ3b to FZ3a and those parts currently in FZ3a to FZ2.</p> <p>With these on site attenuation in place and the modified zones across the site, it would be possible to direct the ‘less vulnerable’ development types away from FZ3b and ensure safe access and egress for any ‘more vulnerable’ uses at upper floors.</p> <p><u>Station Site and Car Park</u></p>

	<p>'Less vulnerable' uses at ground floor level can largely be accommodated on parts of the site which fall outside of FZ3. However, on site attenuation works would also enable Flood Zones across the site to be altered, in a similar way to Marketfield Way above.</p> <p>With these on site attenuation in place and the modified zones across the site, it would be possible to direct the 'less vulnerable' and 'essential infrastructure' development types away from FZ3b and further ensure safe access and egress for any 'more vulnerable' uses at upper floors.</p> <p><u>Reading Arch Road</u></p> <p>The extent of Flood Zone 3b on the site is limited – development could be directed to only those parts of the site in Zones 3a or lower. This would have negligible impact on development potential.</p> <p>The potential to avoid higher risk zones on the Longmead, Gloucester Road and Colebrook sites through reducing development capacity has been discussed at 4d. The principle applies similarly to restricting development to land outside Zone 3b.</p> <p><i>For all sites, proceed to the Exception Test</i></p>
No	<p>N/A</p> <p><i>The development proposal is inappropriate within this Flood Risk Zone and should not be permitted.</i></p>