

Core Strategy Examination

Sequential test for flood risk: Addendum for locations for sustainable urban extensions

December 2012

1. Introduction

- 1.1 The Reigate & Banstead Core Strategy (CS) was submitted to the Secretary of State for examination in May 2012. The submitted CS sets out the long term strategy for growth and development in the borough. In the short to medium term, over the first 10 years, priority is given to regeneration and making the best use of the development opportunities that exist in the urban area.
- 1.2 In the longer term, the submitted Core Strategy identifies that some greenfield development will be required to accommodate sustainable urban extensions. Core Strategy Policy CS4 included guidance about the criteria that will be used to identify where longer term development will take place.
- 1.3 Following submission, the Core Strategy Inspector identified some key concerns about the approach taken to sustainable urban extensions in the submitted document, in particular considering that:

‘the CS appears somewhat ambivalent about the need for Sustainable Urban Extensions (SUE), whereas the evidence points clearly to a gap in supply for which SUEs are the only option proposed. So as to provide a strategic framework for future DPDs, the CS should identify the broad geographic location of SUEs and their likely scale and timing.’
- 1.4 As a result, the Council has undertaken additional technical work to identify broad geographic locations to accommodate sustainable extensions to the existing urban area. These will be included within the Core Strategy to provide greater certainty with respect of housing supply in the latter stages of the plan period.
- 1.5 The latest Strategic Housing Land Availability indicates that it is likely that up to 1,600 homes will need to be located in urban extensions unless unanticipated sustainable opportunities arise in the urban area.
- 1.6 The Council published a proposed methodology for discussion at the Exploratory Meeting. This methodology (RBBC6) identified the following main stages for the identification and assessment of broad locations:
 - a. Task 3a: Screening out of landscape-scale constraints that are considered to be severe constraints to development and where land does not have a realistic prospect of being developed. *Given the presence of significant amounts of land in areas at low risk of flooding, Flood Zone 3 was also screened out as an absolute constraint to development from the outset.*
 - b. Task 3b: Identification of initial areas of search around and adjoining the urban area, excluding as far as possible those areas covered by absolute constraints screened out in Task 3a.

- c. Task 4: Analysis of initial areas of search through:
 - Analysis of localised constraints (including strategic green belt function), accessibility and fit with the overall spatial strategy
 - Sustainability Appraisal according to the adopted East Surrey methodology and objectives
- d. Task 5: Prioritisation of broad location(s)

2. Background

- 2.1 This paper summarises the outcomes of Sequential Testing which has been carried out to inform the assessment of initial search areas and subsequently verify the appropriateness of proposed broad locations.
- 2.2 It should be noted that at this stage, the Core Strategy will only identify broad locations for growth, not specific sites. Further analysis of flood risk in the allocation of sites for development will be carried out as part of the Development Management Policies DPD.
- 2.3 This paper supplements the testing of other priority locations for growth in the Core Strategy which is included in document EP52 - *Reigate & Banstead Core Strategy: Sequential test of flood risk for proposed development locations (April 2012)*

3. Sequential Test Scoping of Initial Search Areas

- 3.1 Sequential Test scoping was initially carried out in Task 4 to examine the flood risk environment of each area. At this initial stage, each search area was tested for its likely ability to accommodate large scale housing growth without the need to develop in areas of higher flood risk and therefore proceed further with the Sequentially, and potentially Exceptions Tests.
- 3.2 The scoping was informed by EA flood mapping set out in the Level 1 Strategic Flood Risk Assessment for Reigate & Banstead (EP19) completed in 2012. A map showing the location of the initial search areas in relation to flood risk area is contained in Annex A.
- 3.3 Table 1 below summarises the extent of flood risk within each area of search and likely need to proceed further with sequential testing.

Table 1: Scoping of flood risk environment and need for further Sequential Testing

Search Area	FZ1	FZ2	FZ3	Description of flood risk environment and summary
A	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
B	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
C	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
D	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
E	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
F	Yes	Yes	Yes	Z3 and small areas of Z2 cover the southern third of the search area. <i>Proceed with sequential/exception test if planned for strategic-scale growth.</i>
G	Yes	Yes	Yes	Small areas of Z3 and Z2 in the south of the search area. Primarily in Flood Zone 1 - considered capable of accommodating strategic-scale housing development without encroaching into areas of Flood Zone 2 or 3 – no need to proceed with Sequential Test.
H	Yes	Yes	Yes	Band of Z3 running east-west through the southern part of the search area, corresponding with watercourse and small areas of Z2 – <i>Proceed with sequential/exception test if planned for strategic-scale growth.</i>
I	Yes	Yes	Yes	Large band of Z2 running east-west through the centre of the search area, part of which is also in Z3. <i>Proceed with sequential/exception test if planned for strategic-scale growth.</i>
J	Yes	Yes	Yes	Very small area of Z3 and 2 in the northern tip of the search area Primarily in Flood Zone 1 - considered capable of accommodating strategic-scale housing development without encroaching into areas of Flood Zone 2 or 3 – no need to proceed with Sequential Test.
K	Yes	Yes	Yes	Band of Z3 running north-south through the west of the search area with some areas of Z2. Large area of Z2 in the north of the search area. Band of Z3 with small areas of Z2 running east-west through south of the search area. <i>Proceed with sequential/exception test if planned for strategic-scale growth.</i>

L	Yes	Yes	Yes	Narrow band of Z3 with small areas of Z2 running east-west through the south of the search area Primarily in Flood Zone 1 - considered capable of accommodating strategic-scale housing development without encroaching into areas of Flood Zone 2 or 3 – no need to proceed with Sequential Test.
M	Yes	Yes	Yes	Band of Z3 and Z2 running east-west through the south of the search area Primarily in Flood Zone 1 - considered capable of accommodating strategic-scale housing development without encroaching into areas of Flood Zone 2 or 3 – no need to proceed with Sequential Test.
N	Yes	Yes	Yes	Narrow band of Z3 and small areas of Z2 running east-west through the north and south of the search area Primarily in Flood Zone 1 - considered capable of accommodating strategic-scale housing development without encroaching into areas of Flood Zone 2 or 3 – no need to proceed with Sequential Test.
O	Yes	Yes	Yes	Substantial band of Z3 and large areas of Z2 running east-west through the centre of the search area corresponding with the watercourse. <i>Proceed with sequential/exception test if planned for strategic-scale growth.</i>
P	Yes	Yes	Yes	Substantial area of Z3 and Z2 in the north-east of the search area. Band of Z3 running north-south through the centre of the search area. Area of Z2 covering the north-west of the search area. <i>Proceed with sequential/exception test if planned for strategic-scale growth.</i>
Q	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
R	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
S	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test
T	Yes	No	No	Wholly in FZ1 – no need to proceed with Sequential Test

3.4 The summary presented in Table 1 shows that there are a number of areas of search where large scale housing growth could be accommodated without the need to develop land in Flood Zones 2 or 3 and thus more vulnerable uses are appropriate. For these locations, at this strategic level of assessment, there is no need to proceed further with the Sequential Test. However it should be noted that should site allocations be progressed in any of these locations, site specific constraints will need to be considered in more detail.

- 3.5 However, in other areas of search, the extent of flood risk means that:
- a) development on land in Flood Zones 2 and 3 would be required in order to deliver large scale housing growth and – should such development be proposed - it would be necessary to proceed further with the Sequential/Exception Tests; or
 - b) only small-scale opportunities could be accommodated without need to proceed further with the Sequential/Exception Tests.

3.6 The outcomes of this initial scoping fed into the Sustainability Appraisal of the areas of search and subsequent prioritisation of preferred broad locations (and their proposed indicative scale of growth).

4. Sequential Testing of Proposed Preferred Locations

4.1 The Sustainability Appraisal (SA) recommended that the following areas should be shortlisted for further investigation for possible urban extensions of a strategic scale:

- Area A: East of Banstead
- Area G: West of Reigate (Woodhatch)
- Area J: East of Redhill
- Area L: East of Salfords
- Area M: South Earlswood
- Area N: West of Salfords

4.2 The SA also highlighted a specific opportunity associated with future smaller scale development in the central part of Area K (Merstham). This area has therefore also been included in the Sequential Testing exercise.

4.3 On the basis that – in accordance with national policy – Green Belts should only be altered in exceptional circumstances and therefore options outside of the Green Belt should be explored first and foremost, a policy decision was made to also consider potential within Areas O (North-West of Horley) & P (South-East of Horley).

4.4 The outcomes of the Sequential testing for each of these areas are discussed overleaf.

Areas O & P

- 4.5 As discussed, Areas O & P have been taken forward for consideration on the basis that national policy dictates that Green Belt boundaries should only be altered in exceptional circumstances and therefore – as the only locations to lie outside of the Green Belt within Reigate & Banstead – the development potential of these should be explored first.
- 4.6 The initial scoping identified that both areas are substantially covered by Flood Zones 2 and 3, with only limited amounts of land falling within Flood Zone 1. This is also reflected in the unfavourable scores which both areas received in relation to flooding and climate change through the Sustainability Appraisal. This suggests that these areas would not be able to accommodate the scale of growth required on land of lower flood risk (Flood Zone 1)
- 4.7 The purpose of the Sequential Test is to steer new development to areas with the lowest probability of flooding, considering areas of higher flood risk only where there are no reasonably available sites for the proposed development in lower risk areas. Alternative locations that can be considered ‘reasonably available’ should therefore be explored before considering developing in high risk flood areas in Zones O & P.
- 4.8 This will require the consideration of opportunities within the Green Belt. The principle that some Green Belt release may be necessary in the latter part of the plan period has been recognised and tested through development of the Core Strategy, and therefore in principle (subject to wider considerations) can be seen as a reasonable alternative. In support of this approach, paragraph 84 of the National Planning Policy Framework directs local planning authorities to “take account of the need to promote sustainable patterns of development” when considering reviews of Green Belt boundaries. In particular, it states that the consequences for sustainable development of directing development to areas outside of Green Belt boundaries should be considered. It is clear from the findings and recommendations of the SA that directing strategic scale growth to the identified locations outside the Green Belt would not represent a sustainable pattern of development. For these reasons, the other areas recommended by the SA but in the Green Belt should be considered to be reasonable alternatives.
- 4.9 **For this reason, Areas O & P are not considered to be sequentially appropriate locations for strategic-scale housing development.** Should a policy decision be taken to direct some level of growth to these locations, the proposed level of growth should be such that it can be demonstrated this would not require land in Flood Zones 2 and 3 to be developed and should also have regard to the likely future impact of climate change.

Area K

- 4.10 Area K has also been shortlisted for further consideration on the basis that the SA highlights specific opportunities in terms of sustainability and regeneration which could arise from developing in the central part of the area.
- 4.11 The initial scoping identified that Area K is affected by Flood Zones 2 and 3, particularly in the northern, western and southern parts of the search area. As a result, this area is unlikely to be able to accommodate strategic scale growth without the need to develop on land in Zones 2 and 3. Given there are reasonable alternatives as discussed above, strategic scale development would not be sequentially appropriate in this location.
- 4.12 However, both the SA and technical study indicate that the central part of the search area should be considered further. This part of the area is wholly within Flood Zone 1 and therefore would be a sequentially appropriate location, albeit unlikely to have the capacity to deliver strategic scale growth.
- 4.13 **Overall, Area K is not considered to be a sequentially appropriate location for strategic scale housing development.** However, directing a lower level of growth to the search area – particularly the central part - is considered to be sequentially appropriate. If a policy decision is taken to this effect, it should still be demonstrated that this would not require land in Flood Zones 2 and 3 to be developed.

Area A

- 4.14 This broad location is located wholly within Flood Zone 1. All development types are compatible with this flood risk environment and there is therefore no need to proceed further with the Sequential Test for this location.
- 4.15 **Area A is considered to be a sequentially appropriate location for strategic scale housing development.**

Areas G, J, L, M & N

- 4.16 Each of these broad locations is predominantly in Flood Zone 1; however, in each there is a limited and discrete area falling within higher risk zones.
- 4.17 The Sequential Test considers the flood risk environment within these areas to be such that growth could be accommodated on land within Flood Zone 1 without the need to encroach on higher risk zones (Zones 2 and 3).

- 4.18 Provided a sequential approach is demonstrated at the time of site allocations (i.e. only land in Zone 1 is allocated for housing development), then these locations can be considered to be akin to and as sequentially preferable as search areas wholly within Zone 1.
- 4.19 **Areas G, J, L, M and N are considered to be sequentially appropriate locations for strategic scale housing development, subject to development being located outside the areas of Flood Zone 2 and 3.**

5. Conclusions

- 5.1 The summary results presented in Table 2 summarise the outcomes of the Sequential Test for the “shortlist” of areas of search being considered in the light of the SA recommendations.
- 5.2 Subject to other planning and sustainability considerations, each of the locations taken forward by the study can be considered to be ‘reasonably available’ (in Sequential Testing for flood risk terms) and therefore as alternatives to each other.
- 5.3 As a result of this, Areas O & P fail the Sequential Test and are not considered to be sequentially appropriate for strategic-scale housing growth as this would require land in Zones 2 and 3 to be developed when there are other options which would allow development to be directed to areas at lower risk of flooding. Growth in these areas could only be considered sequentially appropriate if the proposed level of growth was such that it could be demonstrated that it would not require land in Flood Zones 2 and 3 to be developed. Any proposed growth in these areas should also consider the impact of climate change on flood risk environment in the future. This will ultimately be a policy decision.
- 5.4 All of the other areas taken forward are concluded to be sequentially appropriate for strategic-scale housing growth, with development able to be accommodated on land in Flood Zone 1 in each of the locations.
- 5.5 In order to conform to the conclusions of this strategic testing, a sequential approach to site selection and allocation within any locations prioritised for development should be demonstrated through the DMP. Given that this strategic testing has demonstrated reasonably available options in Flood Zone 1 amongst the preferred broad locations, sites requiring the development of land in Zones 2 and 3 to deliver the proposed development should not be allocated. Site-specific testing should also take account of vulnerability to surface water flooding and non-fluvial sources of flood risk.

5.6 Masterplanning for any sites allocated through the DMP will need to consider the recommendations of Sequential Testing. In particular, measures to manage and mitigate all sources of flood risk and the impacts of climate should be considered and included where possible.

Table 2: Sequential Test summary for areas taken forward in the technical study

Proposed Location	FZ1	FZ2	FZ3	Primary Proposed Uses	Vulnerability	Sequentially appropriate?
Areas O & P	Yes	Yes	Yes	Residential	More vulnerable	No – these areas are not sequentially appropriate for strategic-scale housing development due to the presence of ‘reasonably available’ alternatives which are at lower risk of flooding. These areas could only be considered sequentially appropriate if proposed growth is reduced to a level which would not necessitate developing on Zones 2 & 3.
Area K	Yes	Yes	Yes	Residential	More vulnerable	No – this area is not sequentially appropriate for strategic-scale housing development. This area could be considered sequentially appropriate if the scale of growth proposed is reduced and directed only towards land in Zone 1 – such as the central area which is specifically identified through the SA.
Area A	Yes	No	No	Residential	More vulnerable	Yes – this area is sequentially appropriate. The area is wholly within Flood Zone 1 – strategic-scale development is therefore sequentially acceptable.
Areas G, J, L, M & N	Yes	Yes	Yes	Residential	More vulnerable	Yes – these areas are sequentially appropriate. The areas are predominantly in Zone 1 and strategic-scale development could be accommodated without encroachment into Flood Zones 2 or 3. This is confirmed by reference to identified available sites. A sequential approach to site selection within the preferred location should be demonstrated through the DMP.

Annex A: Overview map of initial search areas

