

Reigate & Banstead

Core Strategy

**Sequential Test of flood risk for proposed
development locations**

April 2012

1. Introduction

- 1.1 This paper presents the results of the Sequential Test for flood risk that has been carried out in relation to the spatial strategy for development set out in the Core Strategy.
- 1.2 The Sequential Test is part of the risk based approach to flood management as advocated by paragraphs 100 - 101 of the National Planning Policy Framework (NPPF) and the accompanying Technical Guidance. The Sequential Test is designed to ensure that Local Planning Authorities (LPAs) steer development to areas of lowest flood risk, requiring them to establish that there are no reasonably available development sites within the areas of lowest flood risk before considering development in areas of higher flood risk. This test is required to be undertaken to inform the preparation of Development Plan Documents.
- 1.3 This paper provides a brief summary of flood risk in the borough and outlines the development of the Core Strategy and the spatial approach to growth. It describes the methodology used in the Sequential Test and provides a summary of how each of the proposed development locations performs against the test. It then presents the conclusions arising from the Sequential Test.
- 1.4 It should be noted that only broad locations for growth have been identified at this stage and the Core Strategic does not include any strategic site allocations. Further analysis of flood risk in the allocation of sites for development will be carried out as part of the preparation of the Development Management Policies document.

2. Flood Risk in the Borough

- 2.1 A Strategic Flood Risk Assessment (SFRA) was first carried out in 2007 and was updated in 2012. [subject to Environment Agency approval]. The SFRA provides an assessment of flood risk from all sources across the borough. For the purposes of sequential testing the main findings of the SFRA in relation to flood risk in the borough are as follows:
 - The risk of flooding within the north of the borough is relatively limited. There is no risk of flooding from rivers; however surface water flooding and flooding from other sources, such as blocked drainage systems can be a problem in this area.

- Redhill town centre is an area at particular risk. Redhill Brook is culverted beneath the town. This culvert system is limited in its capacity, and is susceptible to blockage. During particularly wet weather, the culvert is surcharged, resulting in overland flooding and consequently ponding within the natural 'low spots' within the town centre.
- River flooding is a recognised risk to property in the Horley area. Horley is situated at the confluence of the River Mole and Gatwick Stream, and a short distance downstream is the confluence of the River Mole and Burstow Stream. All three rivers flow through the town in open channel, and all pose a risk of flooding to homes and businesses during events of varying magnitude and return period.
- There is also a risk of river flooding in parts of Earlswood and Merstham.

3. The Core Strategy Spatial Approach to Growth

- 3.1 This section sets out the background to the development of the Core Strategy and the factors that influenced the spatial strategy that underpins the document. It examines the potential for growth in different parts of the borough, the options for growth that were considered and how the preferred locations for growth were chosen.

Priority Locations for Growth

- 3.2 The Core Strategy's Strategic Objectives include the following:
- “SO2: To enable required development to be prioritised within sustainable locations within the existing built up area, which have the necessary or planned infrastructure, services and community provision, while also catering for local housing needs.”
- 3.3 The Core Strategy therefore seeks to focus the largest amount of growth in the urban areas of Redhill and Horley (including two new neighbourhoods) which have high levels of accessibility and infrastructure provision and recognises that areas in the north of the borough have a lower potential for growth.
- 3.4 The Core Strategy also promotes regeneration in those parts of the borough which have fewer facilities, poorer services and accessibility such as Preston and Merstham. The development planned for the Regeneration Areas is part of a strategy to address the problems facing these particular areas and could

not be located elsewhere. Therefore no other locations have been considered for this development.

3.5 The most recent review of housing land availability has indicated that it may also be necessary to consider sustainable urban extensions in the latter part of the plan period.

3.6 Policy CS4 of the Core Strategy identifies the following priorities for the allocation and delivery of development:

Policy CS4 Allocation of land

The Council will prioritise the allocation of land for, and delivery of, development in sustainable locations as set out below:

Short to medium term (up to 2022)

1. Priority locations for growth and regeneration (of equal priority):

- Redhill town centre
- Horley town centre
- Horley North East and North West sectors
- Preston regeneration area
- Merstham regeneration area
- Other regeneration areas as identified by the Council and its partners.

Throughout the plan period

2. Built up areas of Redhill, Reigate, Horley and Banstead:

- a. Town centres first, then
- b. Edge of centre locations within walking distance of town centres.

3. Other sustainable sites in the existing urban area, according to the criteria for sustainable development set out in Policy CS8.

Beyond 2022

4. Sustainable urban extensions may be required. The precise scale and location of these will be determined through further study guided by the criteria for sustainable development set out in CS8 and consideration of landscape character and sensitivity. Areas of search will include:

- a. Those areas of land that have a realistic chance of being developed (not covered by constraints such as AONB) and are not within proximity of the Mole Gap to Reigate Escarpment (to avoid any urbanising impact on the SAC).
- b. Those areas which adjoin the urban area and are accessible to existing public transport/service provision.
- c. Those areas of land which do not make a significant contribution to fulfilling Green Belt functions.

Factors influencing choice of locations

Potential for Growth in Different Areas of the Borough

- 3.7 The potential for growth and sensitivity to change of different areas of the borough was considered in detail in the Borough Wide Landscape and Character Assessment, the findings of which have informed the approach to the distribution of growth in the Core Strategy. The potential for growth in different parts of the borough is usefully summarised in Section 5 of the Core Strategy:

Area 1 The North Downs (including Banstead and Preston)

“...This is an area with limited potential for further development due to limited transport infrastructure, the existing built form and the constraints of the Metropolitan Green Belt and the Area of Outstanding Natural Beauty (AONB). The key objectives of the spatial strategy for this area are to achieve modest and sustainable growth within these limitations whilst preserving and enhancing the area.”

Area 2 Wealden Greensand Ridge (including Reigate, Redhill and Merstham)

“...Having traditionally been the main trading place and centre of the borough there are good transport links and a large concentration of housing in the amalgamated settlements of Reigate and Redhill. The spatial strategy for this area recognises the need to ensure its continued success by maintaining its high economic profile and ability to grow physically and economically in the future.”

Area 3 Low Weald (including Horley)

“...This area is the main location for industrial uses in the borough with strong links to Gatwick Airport. The only large built-up area is the town of Horley, which is surrounded by countryside and is the main focus for moderate growth and improvements to the town centre as a result of the increase in population due to two planned new neighbourhoods.”

Existing Borough Local Plan Allocations for Horley

- 3.8 The Horley North East and North West Sectors are housing allocations identified in the Borough Local Plan which will be carried forward in the Local Development Framework (LDF). These allocations were made in the Local Plan in response to the 1994 Surrey Structure Plan which envisaged the

provision of 1300 dwellings in Horley between 2001 and 2006 and a further 1300 dwellings beyond 2006. Although work has commenced on the North East Sector, the provision of these houses is not substantially complete. The remaining homes to be completed will play an important role in meeting the Council's current housing requirement. These sites are therefore included in the priority locations for growth identified in the Core Strategy.

- 3.9 In taking forward these allocations into the LDF it is necessary to sequentially test them having regard to the latest available information on flood risk. In so doing it is necessary to look at the rationale for the original allocations and the alternatives that were considered.
- 3.10 In making the original allocation the Council considered a number of options for the provision of the housing requirement. An urban capacity study was carried out which showed that only 400 units could be delivered in the urban area of the borough and therefore greenfield allocations were needed to meet the housing requirement. The Inspector's report on the Borough Local Plan First Alterations 2001, paragraph 9.5 acknowledges that in progressing the allocations the Council had sought to make better use of land within the urban area and had made corresponding reductions in greenfield allocations.
- 3.11 The issue of flood risk was also considered by the Inspector in the examination of the First Alterations. The first draft of PPG25 in April 2000 predated the Revised Draft of the Local Plan and the second draft of PPG25 was published during the Inquiry. The Inspector's report, paragraph 10.24 makes the following comments in relation to the matter of whether the proposed allocations would comply with PPG25:

"I think that the approach could be said to be in line with PPG25 and, provided that the floodplain can be reliably defined and appropriate flood risk assessment is made, the allocations could be seen to be consistent with it [.....] In this case the Council has considered whether more of the allocation can be achieved away from the floodplain within the built up area and it is evident that there are no reasonable alternatives for accommodating the allocation."

Options for Growth Considered in the Development of the Core Strategy

- 3.12 At the Core Strategy Issues and Options stage no specific locations for development were considered however three options for growth / density were put forward:

A1: Allow only lower density housing (detached houses) in the borough which would necessitate some new housing within the Greenbelt.

A2: Allow a mix of mainly higher density housing (terraces, townhouses and flats) within urban areas throughout the borough (thereby safeguarding the Greenbelt)

A3: Allow very high-density housing (flats) in areas of high public transport accessibility and a mix of mainly higher densities within other urban areas throughout the borough (thereby safeguarding the greenbelt).

3.13 The Sustainability Appraisal found that options A2 and A3 scored similarly against the sustainability framework on a range of issues including protecting the Green Belt, concentrating high density development on previously developed land and reducing the need for car travel. This therefore pointed towards a strategy focussing development in the most accessible parts of the urban area.

3.14 This approach was carried forward at the Preferred Options stage:

Option 1 Spatial Location of Development : Sustainable levels, locations and forms of development will be sought in accordance with the Borough stated objectives of this strategy and the objectives and policies of the South East Plan and agreed NGP growth. Therefore strategic development in the borough will be directed to the following hierarchy of areas in the Borough:

Redhill – as the Primary Regional Centre and a Regional Transport Hub,

- *Reigate; Horley; and Banstead Village – as a focus for Town Centres*
- *Regeneration in the areas of Redhill Town centre, Horley Town Centre, Preston and Merstham.*
- *Two new neighbourhoods in Horley*
- *Other sustainable locations in the existing urban area*

3.1.5 Following examination and withdrawal of the Core Strategy, further consultation on 'Outstanding Issues' considered various 'broad locations' for future growth beyond 2022:

- Flats above shops
- Development in residential areas
- Urban open land or other urban green space
- Sustainable urban extensions (Green Belt/Rural Surrounds of Horley)

Consultation responses and sustainability testing of these broad locations informed the development of the revised policy CS4.

4. Sequential Test Methodology

- 4.1 The Sequential Test is based on the advice given in the NPPF and the accompanying Technical Guidance. A questionnaire has been used to assess the availability of sites in each flood zone, the types of development proposed and their vulnerability, and consideration of whether the development could be directed to a location at lower risk of flooding. The full Sequential Test is attached at Appendix 1 and a summary of the results is provided in Section 5.
- 4.2 This Sequential Test focuses on the strategy for growth as set out in Section 3 and Policy CS4. The development locations identified in Policy CS4 are shown on the accompanying maps at Appendix 2 which include a borough overview and detailed maps for each area. It should be noted that these are broad locations for growth - detailed allocations are not yet being considered and will be tested as part of the Development Management Policies document. Sequential testing of development sites in Redhill town centre has been dealt with separately in the Redhill Town Centre Area Action Plan Flood Risk Assessment, a copy of which is attached at Appendix 3.
- 4.3 Existing employment sites as allocated in Local Plan have also been included because the Core Strategy (policy CS3) makes reference to retaining and making best use of land within existing industrial areas. Sites identified for development through regeneration initiatives in the Merstham and Preston Planning Frameworks, which fall outside of Zone 1, have been included and assessed in detail.
- 4.4 Sustainable urban extensions have not been included in the Sequential Test as the requirement for these has not been confirmed at this stage and the exact locations of any possible urban extensions are not yet known. Sequential testing will form an essential part of assessing the suitability of any proposed locations for such extensions.
- 4.5 This Sequential Test has been prepared using the most recent Environment Agency Flood Zone maps and information contained in the Reigate and Banstead Strategic Flood Risk Assessment (2012 draft version).
- 4.6 For the purposes of this assessment, which deals with broad locations for development, no distinction has been made between Flood Zones 3a and 3b. However, it is assumed that in all locations development within Zone 3b will be avoided. More detailed analysis of flood risk to individual sites, including

delineation of Zone 3b where appropriate, will be carried out at the site allocations stage.

- 4.7 The assessment includes analysis of detailed flood levels and historic flooding on the Library site in Merstham. Details of flood levels and historic flooding to this site are provided at Appendix 4.
- 4.8 The town centre areas shown on the maps are based on the surveys carried out for the emerging Development Management Policies DPD. With the exception of Horley, town centre boundaries are not defined in the Borough Local Plan and therefore, although they have no formal status these boundaries represent the best evidence available at this time.
- 4.9 The edge of centre areas have been defined using an 800 metre buffer from the edge of each town centre, which represents the 10 minute walking distance from the centre. This is consistent with the “walk in” catchments identified in the Borough Wide Landscape and Townscape Assessment.
- 4.10 The Regeneration Areas boundaries are based on those set out in the Merstham Planning Framework, draft Preston Planning Framework, draft Redhill Town Centre Area Action Plan and Horley Town Centre SPD. The boundaries of the Horley North East and North West Sectors and Employment Area boundaries are based on those in the Borough Wide Local Plan 2005 Proposals Map.

5. Sequential Test Summary

The Sequential Test is documented in full at Appendix 1. The tables below provide a summary of the results for the proposed development locations and existing employment sites.

Proposed Development Locations

Proposed Development Location	FZ1	FZ2	FZ3	Proposed Uses	Vulnerability	Sequential Test Passed?
Banstead town centre	Yes	No	No	Residential, retail	More vulnerable & less vulnerable	Yes
Banstead edge of centre	Yes	No	No	Residential, retail	More vulnerable & less vulnerable	Yes
Preston Regeneration Area	Yes	No	No	Residential, community facilities, retail	More vulnerable & less vulnerable	Yes
Merstham Regeneration Area	Yes	Yes	Yes	Residential, community facilities, retail	More vulnerable & less vulnerable	Yes development can be directed to areas of lowest risk
Reigate town centre	Yes	Yes	Minor area in zone	Residential, retail	More vulnerable & less vulnerable	Yes development can be directed to areas of lowest risk
Reigate edge of centre	Yes	Yes	Yes	Residential	More vulnerable	Yes development can be directed to areas of lowest risk
Redhill edge of centre	Yes	Yes	Yes	Residential, employment	More vulnerable and less vulnerable	Yes development can be directed to areas of lowest risk
Horley town centre	Yes	Yes	No	Residential, retail, leisure and community facilities	More vulnerable & less vulnerable	Yes
Horley edge of centre	Yes	Yes	Yes	Residential, employment	More vulnerable and less vulnerable	Yes development can be directed to areas of lowest risk
Horley North East Sector	Yes	Yes	Yes	Residential, retail, community facilities, open space and recreation	More vulnerable and less vulnerable	Yes development can be directed to areas of lowest risk
Horley North West Sector	Yes	Yes	Yes	Residential, retail, community facilities, open space and recreation	More vulnerable and less vulnerable	Yes development can be directed to areas of lowest risk

Existing Employment Sites

Employment Site	FZ1	FZ2	FZ3	Proposed Uses	Vulnerability	Sequential Test Passed?
Balcombe Road	Yes	Yes	No	Employment	Less vulnerable	Yes
Kingsfield Business Centre	Yes	No	No	Employment	Less vulnerable	Yes
Salfords	Yes	Yes	Yes	Employment	Less vulnerable	Yes. Less vulnerable uses permitted in Zone 3a. No development will be permitted in Zone 3b.
Perry Wood	Yes	No	No	Employment	Less vulnerable	Yes
Wells Place	Yes	No	No	Employment	Less vulnerable	Yes
Holmethorpe	Yes	Yes	Yes	Employment	Less vulnerable	Yes. Less vulnerable uses permitted in Zone 3a. No development will be permitted in Zone 3b.
Albert Road North	Yes	No	No	Employment	Less vulnerable	Yes
Pit Park	Yes	No	No	Employment	Less vulnerable	Yes
Waterhouse Lane	Yes	No	No	Employment	Less vulnerable	Yes

6. Conclusions

- 6.1 The results presented in Section 5 show that the Sequential Test has been met for all of the development locations and existing employment sites that were considered as part of this assessment.
- 6.2 The development locations in the north of the borough are located entirely within Zone 1 and there are therefore no restrictions on development within these areas.
- 6.3 Where development locations include land within Zone 2, for example Horley edge of centre and the Horley North East and North West Sectors, it has been demonstrated that development could not be redirected to areas in Zone 1. In such circumstances residential development and other more vulnerable uses such as community facilities are acceptable in Zone 2.
- 6.4 Where development locations include areas in Zone 3, such as Redhill edge of centre and Horley edge of centre, it has been demonstrated that there is sufficient land available within the broad location to locate residential and other more vulnerable uses within Zones 1 and 2. Only one identified regeneration site outside Redhill town centre is affected by Zone 3 (Library Site Merstham) however development can be restricted to those parts of the site that fall outside of Zone 3.
- 6.5 It has been demonstrated that existing employment sites, where further employment development is planned, could not be located elsewhere. However, employment is a less vulnerable use and this is acceptable within Zones 2 and 3a. No development will be permitted on any part of these sites that fall within Zone 3b.
- 6.6 Further sequential testing will be carried out when allocating sites for development in the Development Management Policies document. This testing will look at specific sites in more detail, including where appropriate definition of Zone 3b, and will take into account the effects of surface water and other sources of flooding in addition to the assessment of fluvial flood risk.
- 6.7 The results of the Sequential Test for sites within the Redhill town centre are presented separately in the Redhill Town Centre Area Action Plan Flood Risk Assessment. (See Appendix 3) For sites within Redhill town centre where the Sequential Test has not been met it will be necessary to meet the requirements of the Exception Test. It is considered that these development sites meet the first part of Exception Test as the regeneration of Redhill town

centre would provide wider sustainability benefits to the community that outweigh the flood risk. The second part of the test requires that the development is safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall. Compliance with this part of the test will need to be demonstrated by developers by reference to site specific flood risk assessments and the Core Strategy includes a policy requirement to this effect.

- 6.7 The assessment of flood risk outlined in this report demonstrates that Core Strategy can deliver the proposed level of growth for the borough in a sustainable manner and the requirements of the NPPF have therefore been met.

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