

Flood Risk Sequential Assessment

Land to the north of the A4, Theale

September 2023

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Client

Panattoni

Our reference

FIRS3002

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1. Introduction

- 1.1 This Flood Risk Sequential Assessment has been prepared by Turley on behalf of Panattoni ('the Applicant') and is submitted to West Berkshire Council (WBC) to support a full planning application on land to the north of the A4, Theale ('the site') for new employment floorspace.
- 1.2 The site is located within Flood Zone 2, and therefore a Sequential Assessment has been prepared to demonstrate the acceptability of the proposed development in light of national and local planning policy.

2. National and Local Planning Policy Context

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.2 The statutory Development Plan comprises the Saved Policies of the Local Plan (June 2002), the adopted Core Strategy (July 2012) and the adopted Housing and Sites Allocations DPD (2017).
- 2.3 Material considerations for the purposes of this report include the National Planning Policy Framework (NPPF) (July 2021), Planning Policy Guidance (PPG) (2014, as amended), the emerging West Berkshire Local Plan and the West Berkshire Strategic Flood Risk Assessment (SFRA).

National Policy

- 2.4 The National Planning Policy Framework ('the Framework') (2021) requires that '*all plans should apply a sequential, risk-based approach to the location of development*' so as to '*avoid where possible, flood risk to people and property*'¹, with a requirement for a 'sequential test' to be applied to ensure that new development is steered to areas with the lowest probability of flooding² (i.e. Flood Zone 1).
- 2.5 The Framework states that '*Development should not be allocated or permitted if there are **reasonably available sites appropriate for the proposed development (Turley emphasis)** in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.*'³
- 2.6 Paragraph 162 of the Framework continues by stating '*Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again*'⁴.
- 2.7 The associated PPG guidance in relation to Flood Risk and Coastal Change advises that the sequential test applies both in plan-making and decision-taking scenarios as follows:
 - Local planning authorities are required to undertake a Strategic Flood Risk Assessment to inform Local Plan preparation with a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding is lowest
 - In decision-taking, developers are required to prepare a site specific flood risk assessment (FRA) for sites over 1ha with local planning authorities applying the sequential test for specific development proposals

¹ Paragraph 161 of the Framework

² Paragraph 162 of the Framework

³ Paragraph 162 of the Framework

⁴ Paragraph 166 of the Framework

- 2.8 The purpose of the sequential approach is *‘to aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding)’*⁵
- 2.9 Through the Local Plan process, when determining the suitability of sites for development consideration should be given to the flood risk. However, as part of the site selection process, the PPG acknowledges that *‘as some areas at lower flood risk may not be suitable for development for various reasons and therefore out of consideration, the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk.’*⁶
- 2.10 With regard to planning applications, where development has not been allocated within a development plan, the PPG advises that *‘the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed’*. With regard to scope of the sequential test, the PPG continues by stating *‘a pragmatic approach on the availability of alternatives should be taken’*⁷
- 2.11 The PPG provides additional guidance on flood risk vulnerability and flood zone capability within Table 2 and 3, summarised below as applicable to the application site:

Table	Reference
Table 1: Flood Zones	Zone 2: Medium Probability: Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Table 2: Flood Risk Vulnerability	Less vulnerable: Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution ; non-residential institutions not included in the ‘more vulnerable’ class; and assembly and leisure.
Table 3: Flood risk vulnerability and flood zone compatibility	Flood Zone 2 – Less vulnerable development is appropriate. The exception test does not apply

Source: Adopted Development Plan: West Berkshire Core Strategy (July 2012)

⁵ PPG reference: Paragraph: 019 Reference ID: 7-019-20140306

⁶ PPG reference: Paragraph: 020 Reference ID: 7-020-20140306

⁷ PPG reference: Paragraph: 033 Reference ID: 7-033-20140306

- 2.12 Policy CS16 of the Core Strategy reflects the requirements of the Framework and advises that the sequential approach will be strictly applied across the District. The policy states *'Development within areas of flood risk for any source of flooding, including Critical Drainage Areas and areas with a history of groundwater or surface water flooding, will only be accepted if it is demonstrated that it is appropriate at that location, and that there are no suitable and available alternative sites at a lower flood risk. When development has to be located in flood risk areas, it should be safe and not increase flood risk elsewhere, reducing the risk where possible and taking into account climate change.'*

Emerging Local Plan: West Berkshire Local Plan Review to 2037

- 2.13 West Berkshire Council is preparing a new Local Plan, the 'West Berkshire Local Plan Review to 2037'. The Local Plan Review was submitted for Independent Examination in March 2023 and is currently awaiting examination dates.

- 2.14 Emerging Policy SP6 (Flood Risk) states that:

"....

A sequential test is needed for all development in all areas of flooding unless:

a. The site is allocated for development and subject to the test at the plan-making stage (provided the proposed development is consistent with the use for which the site was allocated and provided there have been no significant changes to the known level of flood risk to the site, either now or in the future which would have affected the outcome of the test);

b. The site is an area at low risk from all sources of flooding, unless the SFRA, or other information, indicates there may be a risk of flooding in the future; and

c. The application is for a development type that is exempt from the test, as specified in the NPPF.

However applications for the above exceptions should still demonstrate all the requirements for site specific flood risk assessments.

The sequential approach should be followed for all development so that the most vulnerable development is located at the lowest risk flood areas within a site, taking account of all sources of flood risk. Development proposals should also include an assessment of the impact of climate change using appropriate climate change allowances over the lifetime of the development so that future flood risk is taken into account.

....

In applying the Sequential Test, where development has to be located in flood risk areas, it should be demonstrated that:

d. It will be safe and not increase flood risk elsewhere;

e. It will reduce the risk where possible and take into account climate change;

f. Safe access and egress from the development will be provided during the 100-year plus climate change event, from any source of flooding;

g. A sequential approach to development layout will be undertaken with the highest vulnerability development located in areas at lowest risk within the site; and

h. Flood mitigation measures will be as set out in the Level 1 SFRA, or any future SFRA.

Evidence provided within the Level 1 SFRA should be used to apply the sequential test as well as provide evidence to show that other reasonably available sites appropriate for the proposed development have been adequately considered.”

- 2.15 This Sequential Assessment and supporting Flood Risk Assessment demonstrate that the requirements of emerging Policy SP6 have been met.
- 2.16 In addition, and whilst further detail is set out within the supporting Planning Statement and Employment Land Review which supports this application, it is important to note that the emerging Local Plan Review has an identified shortfall of employment land. This will have direct implication as to the availability of sites and therefore the sequential test.
- 2.17 An Addendum to the Employment Land Review identifies a need for additional office and industrial/warehousing space in West Berkshire to accommodate forecast job growth, allow a continuation of past take-up rates and offset anticipated losses. It concludes that this need will not be met by sites that are currently in the pipeline, with a residual requirement for circa 50,800sqm of office space and 91,100sqm of warehousing and industrial space.
- 2.18 The Council has accepted that the allocations proposed in its emerging LPR will not meet the need for employment land in full, with an unmet need for 22,328sqm of industrial space alone.
- 2.19 It is also important to note that the site the subject of this application, in the Regulation 18 iteration of the Local Plan (February 2021), was identified as a formal allocation for employment development. The allocation was removed on the basis of landscape and visual considerations, not flood risk.
- 2.20 As a result, the Council confirmed at this time that the site had passed the sequential test and was appropriate for employment development. This position has not changed.

3. Purpose and Scope of this Assessment

- 3.1 This Sequential Assessment has been prepared in line with the requirements of the Framework and the adopted and emerging policies of the West Berkshire Development Plan.
- 3.2 The application site falls within Flood Zone 2 as identified under Table 1 of the PPG. With regard to the land use proposed through the application, the provision of employment floorspace would be considered a 'less vulnerable use' under Table 2 of the PPG.
- 3.3 When applying Table 3, the provision of a less vulnerable use within Flood Zone 2, would be appropriate with no requirement to undertake an exception test (notwithstanding the conclusions of any associated sequential assessment either through the Local Plan or planning application process).
- 3.4 This planning application is only required to demonstrate through the sequential assessment that there are no reasonably available sites for the proposed development within Flood Zone 1 to accord with paragraph 157 of the Framework, adopted Core Strategy policy CS16 and emerging Local Plan policy SP6.
- 3.5 However, whilst this sequential assessment supports a planning application, it remains pertinent that the Council identified has already completed the sequential assessment as part of its site selection process to inform the previously proposed allocation of the site within the emerging Local Plan and found the site suitable for development. This is an important material consideration which should be given substantial weight in the consideration of this sequential assessment.

Scope of the Sequential Assessment

- 3.6 The Applicant submitted the scope of the sequential assessment to West Berkshire Council in 2019 with a sequential assessment prepared to support an outline planning application (20/00476/OUTMAJ) on the site in December 2019. This application was subsequently withdrawn.
- 3.7 However, through the determination process, further feedback was received on the assessment from Officers' and this has been addressed, as far as possible, through this assessment alongside the procedures identified within SFRAL1.
- 3.8 Whilst a further application was submitted under reference 21/02029/COMIND, no detailed comments in relation to the sequential assessment were received.

Strategic Flood Risk Assessment Level 1 (SFRAL1)

- 3.9 The Strategic Flood Risk Assessment Level 1 (SFRAL1) prepared by JBA summarises the requirement for undertaking the sequential test within the Local Plan preparation. The assessment advises that the following stages have been undertaken:

- **Stage 1:** The first stage of the Sequential Test will identify all potential sites located within Flood Zone 1, and at low risk of flooding from all other sources, in order that they can be taken forward for consideration for inclusion in the Local Plan at the Preferred Option Stage. It is possible that all the necessary development required over the plan period cannot be accommodated by sites identified above as low risk from all sources (noting that the SA process may discount some low risk sites on other grounds), and additional sites may be required to enable delivery of the level of development set out in the Local Plan.
- **Stage 2:** The next stage will be to undertake a Level 2 SFRA to provide further detail on the flood risk (including flood hazards and depths, actual flood risk and residual flood risk to sites), the potential for using sequential design of the site to move development away from flood risk, and provide evidence for the application of the Exception Test if required.

3.10 Whilst it is not mandatory to provide a Level 2 SFRA, where a Level 1 SFRA indicates that sites outside flood risk areas cannot accommodate the extent of development proposed, local authorities are advised to consider progressing to Level 2 in order to provide further detail and development solutions for prescribed sites and for the application of the Exception Test, if required

3.11 With regard to applying the sequential test to individual planning applications, the SFRAL1 advises¹⁰ *'Developers should use evidence provided in this SFRA to apply the Sequential Test as well as provide evidence to show that they have adequately considered other reasonably available sites. This should include other sites allocated within the West Berkshire Local Plan Review to 2036 (LPR) and West Berkshire Minerals and Waste Local Plan (MWLP) as suitable for the proposed development.'*

3.12 It further states that the following procedure will apply to the application of the sequential test¹¹:

'1. Identify whether the Sequential Test is required. It is not needed for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site), development sites which have been allocated through the Local Plan or for sites in Flood Zone 1 at low risk from flooding from other sources as shown by the maps in this SFRA and set by criteria set out in section 5.3.1.

2. If the Sequential Test is required, the LPA should agree the area of search with the applicant. This should be guided by the requirement for the proposed development in a particular area.

3. Determine whether there are any other 'reasonably available' sites within Flood Zone 1 and away from other sources of flood risk, or whether the sequential approach can be used to move all of the development within the site boundary to Flood Zone 1 and away from other sources of flood risk.

¹⁰ Paragraph 5.5 of the SFRA Level 1 (2019)

¹¹ Page 54 of the SFRA Level 1 (2019)

4. If there are found to be other reasonably available sites at a lower risk of flooding, then the development has failed the Sequential Test and planning permission should be refused. If there are no other reasonably available sites, then the development can be deemed as passing the Sequential Test and the Exception Test may be required as set out in Table 3 of the PPG.'

3.13 In line with PPG guidance, West Berkshire Council has prepared a Level 2 Strategic Flood Risk Assessment (L2SFRA) given, as part of the site selection process, the Council has identified that there is insufficient land outside Flood Zone 2 and 3 to accommodate its employment needs to 2037. _ The L2SFRA provides a detailed summary with regard to the Application site to support its proposed allocation within the emerging Local Plan¹².

3.14 This Sequential Assessment has been prepared in accordance with the above requirements appreciating the guidance contained within the PPG with regard to confirming that *'the Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans'*.¹³

3.15 The remainder of this assessment is structured as follows:

- Section 4: Background to the Site and Development Proposals;
- Section 5: The Sequential Test
- Section 4: The Sequential Test: Stage 1 - Methodology and Assessment
- Section 5: The Sequential Test: Stage 2 - Sites for further consideration
- Section 6: Conclusion

¹² <https://info.westberks.gov.uk/CHttpHandler.ashx?id=49807&p=0>

¹³ Paragraph: 033 Reference ID: 7-033-20140306

4. Background and Development Proposals

The Site and Surrounding Area

- 4.1 The site lies directly to the west of Junction 12 of the M4, and to the north of the A4 Bath Road. It is located on the eastern edge of the settlement boundary of Theale.
- 4.2 The site, which is rectangular in shape, extends to approximately 5.4 ha. There is no built form across the site, which is currently an existing field, although there is an existing telecommunication mast and sub-station to the north-east of the site between the site boundary and the M4. The M4 is located along the eastern boundary with the Bath Road directly to the south. The site abuts the High Street to the north with a number of residential properties along the north-western boundary. The western boundary aligns with Hoad Way that provides access into Theale High Street.
- 4.3 In terms of the flood risk of the site, the Environment Agency maps identify the site as primarily lying within Flood Zone 2.

The Site Attributes

- 4.4 To provide a benchmark against which to assess the other sites, below we briefly set out the key attributes of the application site in terms of its suitability for the proposed development.
- 4.5 The site comprises approximately 5.4 ha of grassland, which abuts the settlement boundary of Theale and in proximity to Reading, providing a wide local employment base. The site has good access to public transport links with Theale train station being located approximately 900m south west of the site. Whilst improvements to the vehicular access to the site is required, its proximity to the M4 is ideal for logistics uses with access to the wider strategic road network across the UK.
- 4.6 The site's connectivity to the motorway network and Heathrow Airport will attract a diverse and abundant occupier base. This is evident in the fact that there is an existing array of employment uses in the surrounding area.
- 4.7 It is not located within the AONB and vegetation within the site is mainly found on the perimeters and will be retained where possible to buffer views of the proposed development.
- 4.8 In terms of flood risk, the falls within Flood Zone 2. The flood risk vulnerability of broad development types is set out in Table 2 of the 'Flood Risk and Coastal Change' section of the PPG. Table 3 of the 'Flood Risk and Coastal Change' section of the PPG indicates that 'less vulnerable' land uses, which include class B1, B2 and B8 uses, are considered appropriate in Flood Zones 2 and 3a, subject to the demonstration through the Sequential Test that no sites within Flood Zones 1 are reasonably available.
- 4.9 The size of the site allows for the delivery of 2 employment units with associated staff parking and yard area to meet existing employment requirements within West

Berkshire and specifically the eastern area of the District where there is easier and faster access to the strategic road network .

- 4.10 This Assessment should be read alongside the supporting Planning Statement and Employment Land Statement that considers the lack of available employment supply within West Berkshire which this proposal seeks to address.

Development Proposals

- 4.11 *The description of development is as follows:*

“Full planning application for the construction of 2 employment units for flexible uses within Class E (light industrial), B2 and B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access, parking and landscaping”

5. The Sequential Test

Introduction

- 5.1 In undertaking the sequential assessment, in order to establish which sites are included within the assessment, consideration has been given to the national policy and guidance alongside adopted and emerging Development Plan policies.
- 5.2 The National guidance included within Flood Risk Assessment: the sequential test for applicants¹⁸ has assisted in outlining the parameters against which ‘reasonably available sites appropriate for the proposed development’ will be considered. We have summarised the guidance alongside the parameters informing the assessment below:

National guidance included within Flood Risk Assessment: the sequential test for applicants	Applicant’s Sequential Assessment parameters
Contact your local planning authority to discuss what the search area should be for alternative sites for your development.	Area of Search is confirmed as the West Berkshire administrative boundary
Within the area you’ve agreed with your local planning authority, look for sites that could be suitable for your development.	The scope was initially agreed with WBC in January 2020. However, further feedback was received during the application which has been considered within this assessment.
check your adopted or draft local plan for sites that have already been allocated for development and could be suitable for the development you’re proposing	This assessment includes adopted and emerging local plan allocations to understand whether they could accommodate the development. We note that the site is included as a draft allocation within the emerging Local Plan.
Also look at sites that haven’t been allocated in the local plan, but that have been granted planning permission for a development that’s the same or similar to the development you’re proposing. Your local planning authority will have details of sites with planning permission.	We have reviewed the most recent Annual Monitoring Reports to understand any planning permissions that have been granted planning permission that could deliver <i>‘the same or similar development’</i> .
Check with your local planning authority whether there are any ‘windfall sites’ in your search area. Windfall sites are sites that aren’t allocated in the local plan and don’t have planning permission, but that could be available for development.	We have reviewed the most recent Housing and Economic Land Availability Assessment (December 2020) with regard to the availability of employment sites.

¹⁸ <https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants>

<p>You need to check the approximate capacity of each potential alternative site</p>	<p>The proposed development proposes an appropriate employment density for the site. The ability for a 'reasonable alternative site' to accommodate the level of development proposed has been assessed.</p>
<p>For each of the potential alternative sites, you need to state:</p> <ul style="list-style-type: none"> • its name and address • whether it has been allocated in the local plan (ie identified for a specific use like housing) • any issues that would prevent development on the site (eg roads that are too small) and whether these issues could be overcome • your estimate of its approximate capacity 	<p>An assessment will be taken on each reasonably available site appropriate for the proposed development</p>
<p>Supporting documentation about your alternative sites, eg the local plan background and evidence base documents or housing and economic land availability assessments</p>	<p>The assessment includes a review of the supporting documentation associated with each of the reasonably available sites appropriate for the proposed development. This includes the application of adopted planning policies to understand whether development on the reasonable alternatives sites, in principle, based on technical constraints would be acceptable.</p>

6. Sequential Test: Stage 1 - Methodology and Assessment

We have set out below the methodology underpinning the assessment and associated conclusions below:

Stage 1: Assessment Methodology

Establishing the Area of Search

6.1 In line with paragraph 158 of the NPPF, and due to the scale and type of development proposed, a district wide search area has been adopted – a position that has been agreed with West Berkshire Council. This search area will ensure that a robust assessment of sequentially preferable sites is undertaken.

Identifying Sites to be assessed

6.2 The following sources of evidence have been used to derive the most comparable alternative sites:

- Strategic Housing Land Availability Assessment (December 2020);
- Protected Employment Sites (sites identified within the adopted Development Plan);
- Sites with permission for commercial uses identified within the Annual Monitoring Report (2014) – the most up-to-date AMR considering employment; and
- Any commercial schemes outside protected employment sites being marketed for sale.

Size and Type of Site to be Assessed

6.3 It is important to highlight that the development being pursued is to satisfy identified market needs due to the current lack of available sites in the district. The supporting evidence base to the emerging Local Plan¹⁹ identifies a shortfall in office and industrial floorspace particularly to the west of the District, with the Regulation 18 Local Plan acknowledging through the allocation of the application that, that is can assist in meeting the identified employment needs for West Berkshire over the plan period.

6.4 In particular, regional and local employment evidence emphasises that the demand from prospective occupiers for employment sites seek sites with excellent connections to the strategic road network particularly the M4. In addition, it identifies that no sites, other

¹⁹ Employment Land Availability Report (2020)

than the application site, have been promoted to the Local Plan process to the west of the District.

- 6.5 Given the requirements of national guidance, the methodology has been proposed to consider whether sites identified for inclusion within the assessment can accommodate the 'same or similar to the development' being proposed through the planning application.
- 6.6 The operational requirements of type of intended occupiers expected to occupy the proposed development are significant when applying the sequential approach. Similarly, to achieve the level of development required, a certain developable area needs to be achieved to ensure adequate servicing, parking and other necessary ancillary services.
- 6.7 Against this background, it is proposed that the following parameters will be adopted in addressing the sequential test. The purpose of these parameters is to ensure that the sites being assessed are comparable to that of the application site and would ultimately be capable of providing the type and character of development which is similar to the application scheme.
- Site area between 5.0 and 6.0 ha; and
 - Proximity to strategic road network in light of the identified requirements within the Local Plan evidence base; and
 - Capacity for between 11,250 sqm and 18,750 sqm of floorspace (25% buffer) in light of national guidance;
 - The acceptability of the site in planning policy terms to demonstrate the sites are deliverable and developable with regard to being a reasonably available sites appropriate for the proposed development with a prospect of planning permission being granted for 'the same or a similar development';
 - The site is being marketed and is available for freehold purchase by the Applicant;
 - Flood Risk – sites within Flood Zone 1 (being sequentially preferable).
- 6.8 Any site that falls outside of one or more of the above parameters will not be taken forward for detailed consideration in Stage 2.

Sites Discounted at Stage 1

- 6.9 All sites that did not meet one or more of the six criteria identified at paragraph at 5.11 were discounted at Stage 1 and do not comprise reasonable alternatives. All sites identified have been assessed and the site proformas are included at Appendix 1.

7. Sequential Test Stage 2: Sites for further consideration

7.1 The following sites were taken forward for further consideration at Stage 2.

- Land east of Colthrop Industrial Estate, south of Bath Road, Thatcham – identified within the HEELA (2020): Site reference MID5
- Sandlesford Park, Newbury – identified within the HEELA (2020)

7.2 The above sites were discounted as being sequentially preferable to the Applicant site. The site proforma is included at Appendix 2.

7.3 Of all the sites considered at Stage 1 and 2, none of the sites are considered to be sequentially preferable to the Application site. Mindful of the site specific criteria identified in Section 5 and the requirements of the Framework and PPG, all sites have been discounted for 1 or more of the following reasons:

- Not sequentially preferable in flood risk terms by being located within Flood Zones 2 and/or 3;
- Not available for freehold purchase following a review of sites currently being marketed for sale;
- Not currently available for redevelopment and are unlikely to be available in the short-term either through land ownership or known technical constraints;
- Are not able to accommodate ‘the same or similar development’ with regard to the minimum size or floorspace threshold identified, thus inappropriate to accommodate the proposed development;
- Are identified as not suitable for development within the Council’s own evidence base due to technical concerns, specifically the HEELA (2020);
- Would not be appropriate for the proposed development when applying adopted planning policies particularly sites within the AONB where development opportunities due to landscape considerations are limited;

7.4 It is, therefore, concluded that there are no alternative development sites which are, when taking all known constraints into account, sequentially preferable to the application site in flood risk terms and which could accommodate the proposed employment scheme. Accordingly, it is considered that the Flood Risk Sequential Test is passed.

8. Conclusion

- 8.1 Having regard to the NPPF and supporting PPG and national guidance, a Sequential Assessment has been undertaken in respect of the proposed development at the Land at Hoad Road, Theale in respect of the its location in a Flood Zone.
- 8.2 The application site is primarily located within Flood Zone 2. The general thrust of flood risk policy is to direct development away from areas at the highest risk of flooding. Where development is to be located in areas at risk of flooding, it should be both safe and where possible, reduce the risk of flooding elsewhere. The underlying objective of policy is therefore to facilitate development that preferably doesn't flood but where this is unavoidable, ensure that there are precautions in place to limit damage and risk to life.
- 8.3 The proposed development comprises a 'less vulnerable use' and is acceptable in principle in Flood Zone 2, subject to the application of the Sequential Test.
- 8.4 The application site is a proposed allocation within the West Berkshire Regulation 18 Local Plan Review consultation for employment floorspace and is the only site to the west of the District with good access to the strategic road network (M4 in particular) to address the employment land/occupier requirements identified within the Council's most recent employment evidence.
- 8.5 In line with national policy, all 'reasonably available sites' have been assessed. The assessment included a review of existing development plan allocations, other potentially suitable sites identified promoted through the HEELA with a review of the prospects of each site being appropriate for the proposed development with regard to flood risk, size, planning policy support and technical constraints. In addition, sites being actively marketed for freehold sale have also been reviewed.
- 8.6 This Sequential Assessment has demonstrated that the application site is an appropriate location for the proposed employment development and, in particular, that there are no sequentially preferable sites in respect of either the flood risk that are appropriate or available.
- 8.7 Taking all the above into account, it is clear that the Sequential Assessment has been undertaken in accordance with National Guidance and suitably demonstrates that the application site is the most appropriate and therefore sequentially preferable site for the proposed development.

Appendix 1: Sites discounted at Stage 1

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Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Former Youngs Garden Centre, Youngs Industrial Estate, Aldermaston	2.63 ha	Existing building merchants	1	The site is detached from an existing settlement boundary. The site is within the Inner Zone of AWE Aldermaston/ Burghfield.		The site is previously developed land although is below the 5-6ha site requirement to accommodate the same or a similar development. The site has poor access to the strategic road network.		7,740sqm (HEELA 2020)	Whilst the site is within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is poorly related to the strategic road network.
Land to the south of Youngs Industrial Estate, Paices Hill, Aldermaston	2.9ha	Aldermaston Raceway	1	The site is detached from an existing settlement boundary. The site is within the Inner Zone of AWE Aldermaston/ Burghfield		The site is not an allocation within the adopted Development Plan. The site is previously developed land although is below the 5-6ha site requirement to accommodate the same or a similar development. The site has poor access to the strategic road network.		11,600sqm (HEELA 2020)	Whilst the site is within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is poorly related to the strategic road network.
Land off Benyon Road, Easter Park, Tadley	2.1 ha	Part vacant, part commercial plantation	1	The site is within the Inner Zone of AWE Aldermaston/ Burghfield		The site is previously developed land although is below the 5-6ha site requirement to accommodate the same or a similar development. The site has poor access to the strategic road network.		8,400sqm (HEELA 2020)	Whilst the site is within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is poorly related to the strategic road network.
Beenham Landfill & Compost Area, Grange Lane, Beenham, RG7 5PY	7.31	Hardstanding and storage	1	The site is detached from an existing settlement boundary. The site is within the AONB		Landscape capacity concerns	<i>'Not available in the plan period'</i> – Employment Land Report, 2020	29,240 sqm (HEELA 2020)	The site is not currently available. The site is within the AONB.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Beenham Landfill, Beenham, RG7 5PY	17.21	Restored landfill	1	The site is detached from an existing settlement boundary. The site is within the AONB		Landscape capacity concerns	'Not available in the plan period' – Employment Land Report, 2020	68,840sqm (HEELA 2020)	The site is not currently available. The site is within the AONB.
Beenham Landfill, Pips Lane, RG7 5QT	3.66	Restored landfill	1	The site is detached from an existing settlement boundary. The site is within the AONB		The site is below the 5-6ha site requirement to accommodate the same or a similar development	'Not available in the plan period' – Employment Land Report, 2020	14,640sqm (HEELA 2020)	The site is not currently available. The site is within the AONB.
Beenham Landfill, A4 Road Frontage, Beenham, RG7 5HY	3.88	Restored landfill	1	The site is detached from an existing settlement boundary. The site is within the AONB		The site is below the 5-6ha site requirement to accommodate the same or a similar development	'Not available in the plan period' – Employment Land Report, 2020	15,520sqm (HEELA 2020)	The site is not currently available. The site is within the AONB.
Field Farm, Mill Road, Burghfield	28.4	Landfill	68% -FZ 1 13.6% - FZ 2 18%-FZ 3	The site is detached from an existing settlement	HEELA (2020) - The site has extensive highway frontage on to Burghfield Road and as such an access with the necessary visibility splays could be achieved. However, the road lacks footways to the north (Calcot) and land ownership along the road is unlikely to be able to provide a footway. Consequently the site is not recommended on the grounds of poor sustainability.			THE HEELA (2020) provides not capacity for employment floorspace. Residential capacity is assessed.	Whilst the majority of the site is within FZ1, the Council's own evidence considers the site is not sustainably located.
Land at Green Park, Kirton's Farm Road, Reading	3.22	Grassland	FZ1: 23% FZ2: 30.6% FZ3a: 46% FZ3b:0.6%	The site is detached from an existing settlement	HEELA 2020 - There are no details as to how the site would be accessed to the public highway. There are no footways in the area. The site is unsustainable, and is not supported by the Council's Highways Team. There is a one way working with traffic signals on the nearby railway bridge. This, along with other aspects of what are rural country lanes, is unsuitable to accommodate traffic increases from the development of 68 or 200 dwellings.	The site is below the 5-6ha site requirement to accommodate the same or a similar development	The site is considered unsuitable in the HEELA (2020).	12,880 sqm (HEELA 2020)	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The Council's own evidence identifies that the site is unsuitable for employment development due to access constraints.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Herons Nest, Station Road, Theale	31.3	Former quarry	FZ1: 74.4% FZ2: 14.9% FZ3a: 9.8% FZ3b: 0.9%	The site is detached from an existing settlement	HEELA (2020) - it is considered that the site is in an unsustainable location, and therefore Highways do not support this site.			125,200 sqm (HEELA 2020)	Whilst the site is predominately in Flood Zone 1, the Council's own evidence concludes that the site is not suitable for employment development due to its unsustainable location.
The Guide Dogs for the Blind Association, Hillfields, Reading Road, Burghfield Common, RG7 3YG	19.1	Guide Dogs for the Bind Head Quarters	1	The site is detached from an existing settlement	HEELA (2020) - Development would be inappropriate in the context of the existing settlement form, pattern, and character of the landscape.	The opportunity is limited to the re-use of existing building on-site for employment uses. The site is considered unsuitable in the HEELA (2020).		76,400sqm (Turley estimate)	Whilst the site is within Flood Zone 1, there are limited opportunities available at the site to accommodate the development capacity threshold for the same or a similar development. The Council's own evidence considers the site is not suitable for employment development.
Land at Chieveley Junction, off A34	36.42	Agriculture	1	The site is detached from an existing settlement. The site is within the AONB. The site has good access to the strategic road network		HEELA (2020) - Development would be inappropriate in the context of the existing settlement pattern, form, and character of the landscape. Concerns that development would harm the AONB. The site is considered unsuitable in the HEELA (2020).		145,680 sqm (HEELA 2020)	Whilst the site is within Flood Zone 1, with good access to the strategic road network, the Council's own evidence does not considered the site suitable for employment development due to the site being within the AONB.
The Old Nursery, Bradley Court Lane, Chieveley, RG18 9XZ	1.22	Agriculture (Former nursery)	1	The site is detached from an existing settlement	HEELA (2020) - AONB Unit: Yes. Harm would be caused to the natural and scenic beauty of the AONB.	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is considered unsuitable in the HEELA (2020).		4,880sqm (Turley estimate)	Whilst the site is within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development. The Council's own evidence considers the site unsuitable for employment development.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Ian's Field, West of Hermitage Farms, Oare, Hermitage, RG18 9SD	7.96	Agriculture	1	The site is detached from an existing settlement. The site is within the AONB.	HEELA (2020) - Old Street and Manor Lane are windy single track roads that are unable to accommodate the expected traffic increases. This along with the unsustainable location of the site results in this site not being supported.	The site is considered unsuitable in the HEELA (2020).		31,840 sqm (HEELA 2020)	Whilst the site is within Flood Zone 1, the Council's own evidence does not considered the site suitable for employment development due to the site being within the AONB and located within an unsustainable location.
Hermitage Farms, Oare, Hermitage, RG18 9SD	2.57	Agriculture	1	The site is in employment use. The site is detached from an existing settlement. The site is within the AONB.	HEELA (2020) - Impact on local highway capacity. The Council's Highways Team do not support the site. Development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape.	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is considered unsuitable in the HEELA (2020).		10,280 sqm (Turley Estimate)	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The Council's own evidence does not considered the site suitable for employment development due to the site being within the AONB and located within an unsustainable location.
Land north of Manor Lane, Oare, Hermitage, RG18 9SB	6.44 (HEELA, 2020 identifies 3.22ha available for employment)	Agriculture	1	The site is detached from an existing settlement. The site is within the AONB.	HEELA (2020) - Impact on local highway capacity. The Council's Highways Team do not support the site. Development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape.	The site is considered unsuitable in the HEELA (2020).		12,880 sqm (HEELA 2020)	Whilst the site is within Flood Zone 1, the Council's own evidence does not considered the site suitable for employment development due to potential impact on the local highways network.
Kiln Estate, Oare, Hermitage	9	Agriculture	1	The site is detached from an existing settlement. The site is within the AONB.	HEELA (2020) - Local Highway Capacity: Old Street and Manor Lane are windy single track roads. The expected level of traffic would be overwhelming for such roads. The site is also within an unsustainable location. It is therefore not being recommended.	The site is considered unsuitable in the HEELA (2020).		36,000 sqm (Turley Estimate). The HEELA (2020) provides not capacity for employment floorspace. Residential capacity is assessed.	Whilst the site is within Flood Zone 1, the Council's own evidence does not considered the site suitable for employment development due to potential impact on the local highways network. The Council's evidence has also only considered the site for residential development.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Kiln Fields, Oare, Hermitage	18	Agriculture		The site is detached from an existing settlement. The site is within the AONB. There is a Grade II Listed Building (Kiln Farm) adjacent to the site, and there is the potential for impact.	Landscape capacity concerns identified within the HEELA (2020) HEELA (2020) - Access issues and development would impact upon local highway network. The Council's Highways Team do not support the site. Development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape.	The site is considered unsuitable in the HEELA (2020).		72,000 sqm (Turley Esyimate) THE HEELA (2020) provides not capacity for employment floorspace. Residential capacity is assessed.	Whilst the site is within Flood Zone 1, the Council's own evidence does not considered the site suitable for employment development due to potential heritage impact, identified access and highways issues and given the site is within the AONB.
Land south east of M4 Junction 13, Chieveley	48	Agriculture	1	The site is detached from an existing settlement. The site is within the AONB. The site has good access to the strategic road network	Landscape capacity concerns identified within the HEELA (2020) HEELA (2020) - Development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape. The area is not within or adjacent to a settlement boundary and is within open countryside and so development is not encouraged. Concerns over highways impacts.	The site is considered unsuitable in the HEELA (2020).		192,000sqm (HEELA, 2020)	Whilst the site is within Flood Zone 1 and with good access to the strategic highway network, the Council's own evidence does not support employment development on-site due to the site being within an unsustainable location and within the AONB.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Land south of Fidler's Lane, East Ilsley	2.1	Agriculture	1	The site is adjacent to the settlement boundary		The site is below the 5-6ha site requirement to accommodate the same or a similar development		8,400sqm (Turley Estimate)	Whilst the site is within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development.
Land adjacent Padworth IWMF, Padworth Lane, Lower Padworth, RG7 4HY	3.1	Oil Terminal	1	The site is detached from an existing settlement.		The site is below the 5-6ha site requirement to accommodate the same or a similar development			Whilst the site is located within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development
Land at A34/A4, Speen	2.2	Agriculture	1	The site is detached from an existing settlement and poorly located to the strategic road network.	HEELA (2020) The site is detached from the existing settlement at Newbury and does not relate well to the existing settlement form and pattern.	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is considered unsuitable in the HEELA (2020).			Whilst the site is located within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is also poorly relate to the strategic road network.
Firlands Farm, Hollybush Lane, Burghfield Common, RG7 3JN	26.59	Agriculture	1	The site is adjacent to an existing settlement boundary.	The HEELA (2020) identifies that the site is being promoted principally for residential development. HEELA (2020) - The development of the site is not supported by the Council's Highways Team due to access issues and impact on local highway capacity. Whole of site covered by a TPO.	The site is considered unsuitable in the HEELA (2020).		12,400 (HEELA, 2020)	Whilst the site is located within Flood Zone 1, the Council's own evidence has discounted the site due to impacts of any employment development on the local highway network. The whole site is also covered by a TPO.
Old Sand Pit Lane, Red Shute Hill, Hermitage	4.34	Former sand extraction	1					17,360 sqm (HEELA, 2020)	Whilst the site is located predominately within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development. The Council's own evidence does not consider the site suitable due to highway concerns.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Land adjoining Milehouse Farm, south of Bath Road (A4), Theale	35.56	Agriculture	98.3% - 3b	The site is detached from an existing settlement	HEELA (2020) - The majority of the site is within the functional flood plain (98.3% of the site). Development would not respect the existing settlement form, pattern and character of the landscape.	The site is considered unsuitable in the HEELA (2020).		142,250 sqm (HEELA,2020)	The site is predominately Flood Zone 3b and therefore not sequentially preferable.
Rainsford Farm & Former Paper Mill, Crookham Hill, Thatcham, RG19 4NU	36.2	Former paper mill, aggregate processing, agriculture	2 and 3	The site is detached from an existing settlement	HEELA (2020) - This site is not supported by the Highways Team who consider that the impact of this development will be overwhelming and unacceptable on the level crossing, Thatcham and Crookham Hill. Significant parts of the site located within Food Zones 2 and 3. The presence of high voltage lines above the site and high risk of site contamination from former use further limit the developable area.	The site is considered unsuitable in the HEELA (2020).		2,000sqm (HEELA, 2020)	The site is within Flood Zone 2 and 3 and therefore not sequentially preferable.
Land off Colthrop Lane, Thatcham, RG19 4NT (Site A)	9.67	Sand and gravel processing	FZ1: 95% FZ2: 5%	The site is previously developed land although detached from the existing settlement boundary	HEELA (2020) - access: Site relies upon access from THA1, or from Colthrop Lane. THA1 is not supported by Highways. For access through Colthrop, improvements to the pedestrian routes to the level crossing and beyond are required. This would not appear to be possible particularly over the river bridge.	The site is considered unsuitable based on highways grounds in the HEELA (2020).		38,680 sqm (HEELA, 2020)	Whilst the site is predominately within Flood Zone 1, the Councils' evidence does not support employment development on-site based on highways concerns.
Land off Colthrop Lane, Thatcham, RG19 4NT (Site B)	3.38	Grassland	FZ1:87.7% FZ2: 12.3%	The site is detached from an existing settlement	HEELA (2020) - access: Site relies upon access from THA1, or from Colthrop Lane. THA1 is not supported by Highways. For access through Colthrop, improvements to the pedestrian routes to the level crossing and beyond are required. This would not appear to be possible particularly over the river bridge	The site is considered unsuitable based on highways grounds in the HEELA (2020). The site is below the 5-6ha site requirement to accommodate the same or a similar development		13,520 sqm (HEELA, 2020)	Whilst the site is located predominately within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Land between Benham Hill and Turnpike Road, Thatcham (Area A)	1.62	Agriculture		The site is adjacent to an existing settlement boundary	HEELA (2020) - Development would not be appropriate in the context of the existing settlement form and pattern and character of the landscape.	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is considered unsuitable in the HEELA (2020).		Not provided within the HEELA 2020	Whilst the site is located predominately within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development.
Wyevale Garden Centre, Bath Road, Thatcham, RG18 3AN	3.7	Agriculture	1	The site is within an existing settlement boundary		The site is below the 5-6ha site requirement to accommodate the same or a similar development	14,800 sqm (Turley Estimate)	Only assessed for residential within the HEELA 2020	Whilst the site is located predominately within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development.
Hollington Place, Thatcham	0.2	Residential	1	The site is within an existing settlement boundary	HEELA (2020) - Development would be out of context with the existing settlement form and pattern and character of the landscape.	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is considered unsuitable in the HEELA (2020).		200 sqm (HEELA, 2020)	Whilst the site is located predominately within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development.
Land between Benham Hill and Turnpike Road, Thatcham (Area 2)	3.4	Agriculture	1	The site is adjacent to an existing settlement boundary		The site is below the 5-6ha site requirement to accommodate the same or a similar development	13,600 sqm	Not provided within the HEELA 2020	Whilst the site is located predominately within Flood Zone 1, the site is below the 5-6ha site requirement to accommodate the same or a similar development.
Station Plaza, Station Road, Theale, RG7 4AQ	1.04	Offices		The site is detached from an existing settlement boundary		The site is below the 5-6ha site requirement to accommodate the same or a similar development		800sqm (HEELA, 2020)	The Site is predominately within Flood Zones 2 and 3a, so not sequentially preferable.
Kuehne & Nagel Distribution Centre, Brunel Road, Theale, RG7 4XE	2.6	Storage and distribution		The site is detached from an existing settlement boundary		The site is below the 5-6ha site requirement to accommodate the same or a similar development		3,400sqm (HEELA,2020)	The Site is predominately within Flood Zones 2 and 3a, so not sequentially preferable.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Theale Marina, West of Station Road, Theale	6.08	Agriculture	FZ3b: 96.9% FZ3a: 1.1% FZ2: 1.7% FZ1: 0.3%	The site is detached from an existing settlement boundary	HEELA (2020) - Most of the site falls within the functional flood plain.	The site is considered unsuitable in the HEELA (2020).		24,320sqm (HEELA, 2020)	The Site is predominately within Flood Zone 3b, so not sequentially preferable.
Theale Rail Depot, south of Bath Road, and north	3.5	Agriculture	FZ3b: 94.4% FZ3a: 5.5% FZ1: 0.1%	The site is detached from an existing settlement boundary	HEELA (2020) - Access: The site is contained by the A4 dual carriageway to the north and east, with third party land to the west and the railway to the south. It would not be acceptable to introduce a new junction on to the A4 to accommodate this development and consequently it appears the site is inaccessible on all sides and is thereby unsuitable for any type of development, without providing an access through the depot to the west. Local Highway Capacity: The only potential access point in terms of impact on the local highway would be via Wigmore Lane, but this appears unlikely to achieve as it requires a link through or alongside the depot to the west of the site. Hence unsuitable for development. HEELA (2020) - Access issues and development would impact upon local highway capacity. Most of the site falls within the functional flood plain.	The site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is considered unsuitable in the HEELA (2020).		14,000sqm (HEELA, 2020)	The site is principally within floodzone 3b so not sequentially preferable.
Land at Wigmore Lane, Theale	1.4	Fields	3b	The site is detached from an existing settlement boundary	The site was discounted within the HEELA (2020) due to it being functional floodplain	The site is below the 5-6ha site requirement to accommodate the same or a similar development			The site is principally within floodzone 3b so not sequentially preferable.
Land west of Ramsbury Road,	14.5	Employment	1	Existing employment site. The site detached from the	Landscape capacity concerns identified within the HEELA (2020)			58,000sqm (HEELA,	Whilst the site is within Flood Zone 1 and satisfies

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for not proceeding to Stage 2
Walker Logistics Holding Ltd, Membury, Lambourn Woodlands				existing settlement boundary although previously developed land. The site is within the AONB	HEELA (2020) - Concerns around the sustainability of the site.			2020). Site promoter has only identified 2,600sqm due to landscape capacity issue.	the site area threshold, the Council's evidence identifies that there is only capacity for 2,600sqm on-site due to existing constraints. The site is therefore not able to accommodate in floorspace terms a similar or the same development.

Protected Employment Area as identified within West Berkshire adopted Development Plan

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity (Turley estimate)	Reason for not proceeding to Stage 2
Newbury Business Park	11ha	A modern business park primarily within office uses.	2/3	The site is not available for purchase.	<i>'A number of buildings have prior approval to convert to residential, and this is may weaken the overall attraction to office occupiers. There is one remaining land parcel in the Park's northern corner (Plots 650 and 660 0.3 ha) and this has a permission for 2,968 sq m of office floorspace.'</i> – Employment Land Review 2020		The site is not currently available for redevelopment. There are no parcels of land within the Business Park being marketed for freehold purchase.		The remaining parcel available is not being actively marketed and is below the floorspace requirement to accommodate a similar or the same development.
Hambridge Road/Lane, Newbury	64.6ha	A large industrial area with mix of employment uses.	1/2/3	There are no identified constraints on the site.	<i>'There has been, and is likely to be continued scope for redevelopment of the older stock, but the confines of the PEA boundary means no scope for expansion'</i> – Employment Land Report 2020	The proposed development could be accommodated on the Business Park if sufficient land was available.	There are no areas within the site currently being marketed as available for freehold purchase.		Whilst there is scope identified for re-development, there are currently no sites within the estate available for consideration.
Arlington Business Park, Theale	50ha	Large employment area comprising several developments with a mix of uses including office and industrial/distribution.	2/3	There are no identified constraints on the site.	<i>'High levels of occupancy, but with some buildings and floors within buildings available.'</i> – Employment Land Report, 2020	The proposed development could be accommodated on the Business Park if sufficient land was available.	There are no areas within the site currently being marketed as available for freehold purchase.		There is no land being actively marked as available for freehold purchase. There are currently no sites within the business park available for consideration.

London Road Industrial Estate	13.4	A low density industrial estate that has become increasingly mixed use with retail and sui-generis car showrooms.	The Housing Site Allocation DPD identifies the site for comprehensive mixed use development with an element of office provision. The Employment Land Report (August 2020) confirmed the Council is currently preparing a Development Brief (Para 2.48)		Whilst a number of smaller units are currently being marketed through EG Link, all the units are below the site area and floorspace threshold to accommodate the same or similar development.
Green Lane, Thatcham	0.7ha	A small site with predominately light industrial uses providing local services such as catering and motor repairs	<i>'The buildings are dated, but no scope for intensification or site expansion.'</i> – Employment Land Report, 2020	There are no areas within the site currently being marketed as available for freehold purchase.	The site is below the 5-6ha site requirement. The site is not currently available.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity (Turley estimate)	Reason for not proceeding to Stage 2
Charnham Park, Hungerford	10ha	Industrial estate with a range of B1 and light industrial units located within the AONB.	1		<i>'Occupancy is high, one undeveloped parcel (1 ha) but this has planning permission for an hotel.'</i> – Employment Land Report, 2020	The site is within the AONB. Whilst redevelopment under the Core Strategy would be supported, the ability to deliver a significant quantum of development may be limited due to LVIA considerations.	There are no areas within the site currently being marketed as available for freehold purchase.		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the business park available for consideration.
Station Yard, Station Road, Hungerford	5ha	Industrial area situated adjacent to Hungerford Station, which is bisected by the railway line.	1	<i>'Occupancy rates across the clusters is high, but for the industrial activity road access is the key constraint.'</i> – Employment Land Report, 2020			There are no areas within the site currently being marketed as available for freehold purchase.		There is no land being actively marketed as available for freehold purchase.
Station Road Estates, Theale		Cluster of industrial estates			<i>'There is on-going redevelopment/intensification opportunities, with a new warehouse on the former Kuehne and Nagel site and replacement light industrial/warehousing at the Technology Centre, Station Road. These opportunities are likely to continue, but no scope to expand the boundaries.'</i> – Employment Land Report, 2020		There is no land being actively marketed as available for freehold purchase.		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration.
Turnpike Road Estate, Newbury	4.6ha	Small industrial area with small and low quality purpose built units.	1		<i>'long established industrial site containing small workshop light industrial units providing local services.'</i> – Employment Land Review, 2020.		There is one site being actively marketed through EG Link for freehold purchase. The site is below the floorspace requirements.		The remaining parcel available is not being actively marketed and is below the floorspace requirement to accommodate a similar or the same development.
Castle Estate, Pear Tree Lane, Newbury	1.8ha	Small industrial area in Newbury	1		<i>'A purpose built late 1980s industrial site with small/medium purpose built light industrial units (circa 10 in total) with one larger office unit. The estate is in a residential area to the north of Newbury town centre and occupancy is very high. No prospect of intensification or</i>	The site is below the 5-6ha site requirement to accommodate the same or a similar development';	There are no areas within the site currently being marketed as available for freehold purchase.		The site is below the 5-6ha site requirement.

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity (Turley estimate)	Reason for not proceeding to Stage 2
					<i>expansion.</i> ' – Employment Land Report 2020				
Colthrop Estate, Thatcham	89ha	Substantial mixed industrial and business area set on the periphery of Thatcham adjacent to the A4.	1, 2,3		'Some vacancy in the office stock, but very high occupancy in the industrial and warehousing stock. Land to the south of Gables Way, is the only undeveloped parcel, and this has planning permission for flexible B uses.' – Employment Land Report, 2020	The proposed development could be accommodated if site, or part of it, was available for redevelopment.	There are no areas within the site currently being marketed as available for freehold purchase despite reference within the Employment Land Report.		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration.
Smitham Bridge Trading Estate, Hungerford	1ha	A relatively small and narrow industrial site within the AONB.	1, 2,3		'Fully occupied, but with road access limitations requiring vehicles to pass through the town centre / residential areas to access the A338/M4. Only scope for refurbishment.' – Employment Land Report, 2020		There is one site being actively marketed through EG Link for freehold purchase. The site is below the floorspace requirements.		The site is below the 5-6ha site requirement to accommodate the same or a similar development. The site is not currently available.
Horseshoe Park, Pangbourne	1ha	Purpose built business park with a variety of small occupiers - mainly B1 uses.	1	'the Park has very low prominence and poor access through a residential area' – Employment Land Review, 2020		The site is below the 5-6ha site requirement to accommodate the same or a similar development	There are no areas within the site currently being marketed as available for freehold purchase.		The site is below the 5-6ha site requirement to accommodate the same or a similar development'; The site is not currently available.
Calleva Park, Aldermaston	7ha	Business park with office and other B1 uses in a rural location, mostly small local businesses	1		'With the exception of a very small parcel that had a permission for 2,000 sq m office that lapsed 15 years ago, the park is built out to its limits.' – Employment Land Review, 2020	The site is poorly located for access miles to the strategic road network to accommodate the same or a similar development. Unless the entire site became available, the parcels of land within the site would not be sufficient to accommodate	There are no areas within the site currently being marketed as available for freehold purchase.		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration

Site Name and Address	Site Area	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity (Turley estimate)	Reason for not proceeding to Stage 2
Paices Hill, Aldermaston	6.5ha	Light industrial estate			<i>'There are no undeveloped land parcels within the existing boundary,' – Employment Land Review, 2020</i>	the proposed development.			The site has no capacity to accommodate further development and is not currently available.
Membury, Lambourne	21.9ha	Mix of light industrial and distribution			<i>'Occupiers of the site and generally local. High occupancy levels and evidence of new buildings, expansion and intensification of use' - Employment Land Report, 2020</i>	Access to Junction 14 of the M4.	There are no areas within the site currently being marketed as available for freehold purchase.		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration
Beenham Industrial Area	21.4ha	A cluster of general industrial uses such as building materials occupiers, waste management depot and scrap ya.			<i>'The activity is long established and is located within the North Wessex Downs AONB, which is a major constraint on redevelopment or expansion.' – Employment Land Report, 2020</i>		'General single occupier sites' – Employment Land Report, 2020		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration
Lowesdon Works, Lambourn	2.7ha	Repurposed airfield buildings			<i>'The existing employment space occupying repurposed airfield buildings is fully occupied, and a mix of mostly light industrial and some office. All three areas are within the AONB, which is a major constraint on development.'</i> Employment Land Report, 2020		There are no areas within the site currently being marketed as available for freehold purchase.		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration
Sheffield Bottom, Theale	1.7ha	Out-of- town office park			<i>'The Park is considered to be part of the Reading office market, and occupancy rates are very high as a consequence. Access and flood risk (surrounded by water) are the key constraints. No scope to intensify or to expand the boundary.'</i> – Employment Land Report, 2020		'No availability' – Employment Land Report, 2020		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration
Red Shute Hill, Hermitage	4.0ha	Mix of activity include agri-tech, timber yard and coach hire		Poor access to the strategic road network. <i>'The principle constraints on site expansion are access - the rural lanes that make vehicle access challenging and potential impact on the adjacent AONB.'</i> – Employment Land Report, 2020	<i>'The existing site is fully built out' – Employment Land Report, 2020</i>		'No unit availability' – Employment Land Report, 2020		There is no land being actively marketed as available for freehold purchase. There are currently no sites within the Estate available for consideration

Appendix 2: Sites considered at Stage 2

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Site Name and Address	Site Area	Source	Description	Flood Zone	Any issues preventing development of the site	Any documentation regarding the site	Suitability	Availability	Approx. capacity	Reason for discounting the site at Stage 2
Land east of Colthrop Industrial Estate, south of Bath Road, Thatcham	5.1	HEELA 2020 – MID5	Agriculture	1	Adjacent to Colthrop Industrial Estate. The site is detached from an existing settlement.	No known constraints			20,400sqm (HEELA, 2020)	The site is being actively promoted and therefore is not available for purchase by the Applicant. The site is being considered by West Berkshire for allocation to meet the District's employment needs to 2037. This is an identical position to the Application site. Both sites were considered favourably within the Council's HEELA (2020). On this basis, the site is not sequentially preferable.
Sandleford Park (including New Warren Farm), south of Warren Road and Monks Lane, Newbury	136		Agriculture	1	The site is within the settlement boundary with good accessibility to the strategic road network.	Core Strategy Policy CS3 – identifies the site as allocated for residential development. Business development is likely to come as an ancillary use to support the creation of a sustainable community. The Sandleford Park SP(2015)				The site will bring forward a predominately residential development. The site is not available for development and is subject to an existing Public Inquiry (APP/W0340/W/20/3265460).

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