

West Berkshire Council
Local Plan Review 2022-2039

Sequential Test Report

January 2023

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1. Introduction

- 1.1. The purpose of this report is to set out the Sequential and Exception Tests undertaken to inform the selection of sites for allocation in the proposed submission (Regulation 19) West Berkshire Local Plan Review 2022 – 2039 (LPR).

2. Policy context

- 2.1. The National Planning Policy Framework (NPPF, 2021)¹ requires that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. To do this the Sequential Test should be applied and then, if necessary, the Exception Test.
- 2.2. The aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The Strategic Flood Risk Assessment (SFRA) provides 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.
- 2.3. The NPPF states that where planning applications come forward on sites allocated in the development plan through the Sequential Test, applicants need not apply the Sequential Test again.
- 2.4. The Planning Practice Guidance (PPG) on Flood Risk and Coastal Change² advises local planning authorities on how to take account of and address the risks associated with flooding and climate change. This includes guidance on applying the Sequential Test in the preparation of a Local Plan.

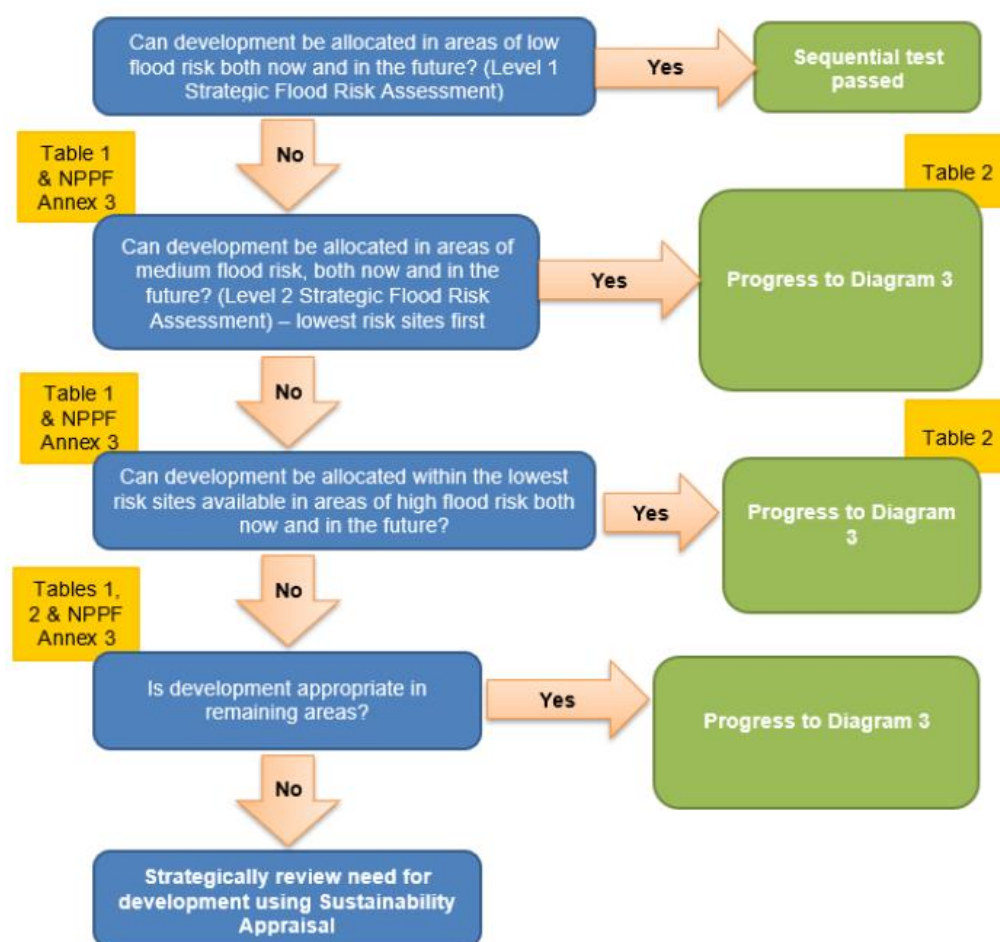
¹ National Planning Policy Framework: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Planning Practice Guidance: Flood Risk and Coastal Change: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

3. The Sequential Test methodology

- 3.1. The Sequential Test outlined in the NPPF and the PPG is designed to ensure areas with little or no risk of flooding (from any source) are developed, in preference to areas at higher risk. The aims are to keep development outside areas at medium and high risk of flooding from all sources (for example, Flood Zones 2 and 3 for fluvial flood risk). This includes ordinary watercourses, surface water, reservoirs, groundwater and sewer flooding.
- 3.2. When allocating land in a Local Plan, Local Planning Authorities should seek to steer new development to the areas with the lowest probability of flooding. They should apply the Sequential Test to show that there are no reasonably available sites at a lower risk of flooding that are appropriate for the proposed development. The PPG identifies the methodology for Local Plan preparation in relation to the sequential test. This is set out in Figure 1 below.

Figure 1: Application of the Sequential Test for plan preparation



Source: PPG (paragraph 025, reference ID: 7-025-20220825)

- 3.3. The Sequential Test needs to be applied to the whole of the Local Planning Authority Area to increase the opportunities to allocate development in areas not at risk of flooding.

3.4. The Level 1 SFRA identifies that in West Berkshire, for a site to be at low risk of flooding, it meets the following conditions:

- Site is within Flood Zone 1
- Site is not within Flood Zone 3 plus climate change
- Less than 10% of the site is at risk of surface water flooding in the 1 in 1000 year event
- Less than 10% of the site is within highest risk category in JBA Groundwater map (groundwater is <0.025m below the surface in the 1 in 100 year event) or the 1 in 100 year Jacobs groundwater emergence extent
- Less than 75% of the site is within the second highest risk category in JBA Groundwater map (groundwater is between 0.025m and 0.5m below the surface in the 1 in 100-year event)
- Site is not within an area highlighted on the Historic Flood Map
- Site is not at risk of reservoir flooding
- Site does not contain a Main River
- Site does not contain an Ordinary Watercourse

3.5. The above criteria take into account the potential to mitigate low levels of surface water and groundwater risk through appropriate design, and therefore are not likely to represent a significant constraint to development.

3.6. It is necessary to take into account the flood risk vulnerability of different types of development as this affects which Flood Zone development may be appropriate in. Flood Risk Vulnerability and Flood Zone ‘Compatibility’ is set out in Table 3 in the PPG. Table 3 is included below as Figure 2 of this report. Residential development (including dwelling houses and residential institutions), together with non-residential institutions (such as schools and health facilities) are classed as “more vulnerable”. Employment uses are classed as “less vulnerable”.

Flood Zones	Flood risk vulnerability classification				
	Essential infrastructure	Highly vulnerable infrastructure	More vulnerable	Less vulnerable	Water Compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception test required	✓	✓	✓
Zone 3a	Exception test required	✓	Exception test required	✓	✓
Zone 3b (Functional Flood Plain)	Exception test required	X	X	X	✓

✓ Development is appropriate

X Development should not be permitted

4. Assessment of flood risk for the LPR

- 4.1. Several sources of supply will ensure that there is a continuous supply of land for development across the plan period, and these include:
- Retained allocations from the adopted Local Plan (Core Strategy and Housing Site Allocations Development Plan Document (DPD)) and Stratfield Mortimer Neighbourhood Development Plan.
 - Allocations in the current Local Plan which are not being retained.
 - Existing planning commitments on unallocated sites.
 - Existing planning commitments for communal accommodation (Use Class C2)
 - Small residential site windfall allowance
 - New sites allocated within the LPR
 - New sites to be allocated within Neighbourhood Plans
- 4.2. This Sequential Test Report focuses specifically on the new sites being proposed for allocation.
- 4.3. As part of the evidence base for the LPR, a Level 1 SFRA was prepared to provide flood risk information across the whole of the district. The Level 1 SFRA initiated the sequential risk-based approach for allocation of land for development.
- 4.4. In order to inform the sequential approach to the allocation of development in the LPR, the Level 1 SFRA included a high level screening of the sites that had been promoted to the Council as part of the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA)³. 34 sites were identified as requiring further, more detailed investigation through a Level 2 SFRA.
- 4.5. The Council used the information contained within the high level screening and included it within the HELAA site assessment. It should be noted that the HELAA has been prepared in accordance with the joint HELAA methodology⁴ that was developed and prepared with four other Berkshire authorities – Reading Borough Council, the Royal Borough of Windsor and Maidenhead, Slough Borough Council, and Wokingham Borough Council. The methodology identifies certain constraints that will exclude a site from further assessment, and this includes if a site is located within the functional flood plain (Flood Zone 3b).
- 4.6. The site selection process that has been used to identify new allocations has comprised of five steps in order to identify reasonable alternatives:
- Step 1: identification of sites
 - Step 2: Housing and Economic Land Availability Assessment
 - Step 3: sites within designated Neighbourhood Areas
 - Step 4: Sites located in 'open countryside' or settlements outside of the settlement hierarchy
 - Step 5: Sites within settlement boundaries

³ <https://www.westberks.gov.uk/helaa>. The HELAA forms part of the evidence base for the LPR, and its purpose is to assist in identifying suitable land which is available for development for different land uses, the development potential, and when development is likely to occur.

⁴ Berkshire Housing and Economic Land Availability Assessment Methodology (November 2016) <https://www.westberks.gov.uk/helaa>

- 4.7. Sites not ruled out in steps 1 to 5 are considered to be reasonable alternatives and have been subject to Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA).
- 4.8. The sites listed within Appendix 1 are considered within the SA/SEA as reasonable alternatives for accommodating the proposed growth identified within the LPR. These sites have been assessed within Appendix 1 to demonstrate that the sites the LPR is proposing to allocate are appropriate from a flooding perspective.

Appendix 1: The Sequential Test

HELA REF	SITE	EXISTING LAND USE(S)	USE(S) PROPOSED BY SITE PROMOTER	IS THE SITE LOCATED WITHIN FLOOD ZONE 1?	IS THE SITE WITHIN FLOOD ZONE 3 PLUS CLIMATE CHANGE?	IS LESS THAN 10% OF THE SITE AT RISK OF SURFACE WATER FLOODING IN THE 1 IN 100 YEAR FLOOD EVENT?	IS LESS THAN 10% OF THE SITE WITHIN THE HIGHEST CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS <0.025M BELOW THE SURFACE IN THE 1 IN 100 YEAR FLOOD EVENT) OR THE 1 IN 100 YEAR JACOBS GROUNDWATER EMERGENCE EXTENT?	IS LESS THAN 75% OF THE SITE WITHIN THE SECOND HIGHEST RISK CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS 0.025M AND 0.5M BELOW THE SURFACE IN A 1 IN 100 YEAR FLOOD EVENT)?	IS THE SITE AT RISK OF RESERVOIR FLOODING?	IS THE SITE WITHIN AN AREA HIGHLIGHTED ON THE HISTORIC FLOOD MAP?	DOES THE SITE CONTAIN A MAIN RIVER?	DOES THE SITE CONTAIN AN ORDINARY WATERCOURSE?	FLOOD RISK VULNERABILITY OF PROPOSED USE	IS THE SITE PROPOSED AS AN ALLOCATION WITHIN THE LOCAL PLAN REVIEW?	CONCLUSIONS
ALD3	Former Youngs Garden Centre, Youngs Industrial Estate, Aldermaston	Builders merchant	Employment (light industrial, business or warehouse units)	Yes	No	Yes	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	No	No	No	No	Employment (light industrial, business or warehouse units) - less vulnerable	No	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. There are constraints which mean the site is unlikely to be suitable within the next 15 years - it is within the AWE Aldermaston Detailed Emergency Planning Zone and advice from the Council's Emergency Planning Team is that development would be unsuitable.
ALD6	Land off Benyon Road, Easter Park, Tadley	Part vacant, part commercial plantation	Employment (B1, B2 and B8 uses)	Yes	No	Yes	Yes	Yes	No	No	No	No	Employment - less vulnerable	No	The site is at low risk of flooding. There are constraints which mean the site is unlikely to be suitable within the next 15 years - it is within the AWE Aldermaston Detailed Emergency Planning Zone and advice from the Council's Emergency Planning Team is that development would be unsuitable.
ALD8	Land south of Youngs Industrial Estate, Paices Hill, Aldermaston	Aldermaston Raceway	Employment	Yes	No	Yes	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	No	No	No	No	Employment - less vulnerable	No	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. There are constraints which mean the site is unlikely to be suitable within the next 15 years - it is within the AWE Aldermaston Detailed Emergency Planning Zone and advice from the Council's Emergency Planning Team is that development would be unsuitable.
ALD10	Strawberry Farm, Burghfield Road, Tadley	Arable and 1 residential dwelling	Office	Yes	No	Yes	Yes	Yes	No	No	No	No	Employment - less vulnerable	No	The site is at low risk of flooding. There are constraints which mean the site is unlikely to be suitable within the next 15 years - it is within the AWE Aldermaston Detailed Emergency Planning Zone and advice from the Council's Emergency Planning Team is that development would be unsuitable.
BEEN3	Beenham Landfill & Compost Area, Grange Lane, Beenham, RG7 5FY	Hardstanding & storage	Employment (B2 and B8)	Yes	No	No, 19% of the site will be affected in a 1 in 1000 year flood event.	Yes	Yes	No	No	No	No	Employment (B2 and B8) - less vulnerable	Part of site	A small part of the site (19%) is at risk of surface water flooding, and using the sequential approach development could be accommodated outside of this area. The proposed use is 'less vulnerable'. Part of the site is proposed for allocation.
BEEN5	Beenham Landfill, Pips Lane, Pips Lane, Beenham, RG7 5QT	Restored landfill	Employment (B2 and B8)	Yes	No	Yes	Yes	Yes	No	No	No	No	Employment (B2 and B8) - less vulnerable	Part of site	The site is at low risk of flooding. Part of the site is proposed for allocation.
BEEN10	Northway Porsche, Grange Lane, Beenham	Car restoration and associated offices	Car based restoration and associated automotive services	Yes	No	Yes	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	No	No	No	No	Car based restoration and associated automotive services - less vulnerable	Yes	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. The proposed use is 'less vulnerable'. The site is proposed for allocation.
BRAD2	Crackwillow House & Village Montessori Nursery School, Cock Lane, Bradfield Southend, RG7 6HW	Residential dwelling and garden, education	Residential	Yes	No	No, 25% of the site is expected to be affected in a 1 in 1000 year flood event.	Yes	Yes	No	No	No	No	Residential - more vulnerable	No	A very small part of the site is at risk of surface water flooding, and using the sequential approach development could be accommodated outside of this area. The site is not proposed for allocation. In principle, part of the site has potential for development in landscape terms in conjunction with BRAD3. However its potential for allocation needs to be considered alongside potential development on BRAD5 due to the concern about the cumulative impact on the AONB in this location. The AONB Unit and Natural England have advised that BRAD5 is considered the most appropriate in landscape terms. Furthermore, given the placing of Bradfield Southend within the settlement hierarchy, it is considered that the development of this site alongside others in Bradfield Southend would be too great for the village. In particular, there is already an existing allocation in the HSA DPD which is very close to BRAD2. There is a covenant on the site and this may impact upon the availability of the site. This is not an issue affecting the preferred site for allocation.
BRAD3	Land south of Crack Willow House & south of Troilman Cottages, Heath Road, Bradfield Southend	Agriculture	Residential	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential - more vulnerable	No	The site is at low risk of flooding. The site is not proposed for allocation. In principle, part of the site has potential for development in landscape terms in conjunction with BRAD2. However its potential for allocation needs to be considered alongside potential development on BRAD5 due to the concern about the cumulative impact on the AONB in this location. The AONB Unit and Natural England have advised that BRAD5 is considered the most appropriate in landscape terms. Furthermore, given the placing of Bradfield Southend within the settlement hierarchy, it is considered that the development of this site alongside others in Bradfield Southend would be too great for the village. In particular, there is already an existing allocation in the HSA DPD which is very close to BRAD3. There is a covenant on the site and this may impact upon the availability of the site. This is not an issue affecting the preferred site for allocation.
BRAD5	Land north of South End Road, Bradfield Southend	Agriculture and area of open storage	Residential, public open space (as part of residential development)	Yes	No	Yes	Yes	Yes	No	No	No	No	Public open space (as part of residential development) - water compatible	Yes	The site is at low risk of flooding. The site is proposed for allocation. A wider site area was promoted, but development of the whole site would be inappropriate. The AONB Unit and Natural England have commented that development of the wider promoted site would be an incongruous addition given the size and character of the village. Development along the south western edge in line with the current allocation would be acceptable without detriment to the north western boundary of Bradfield Southend. Given the size of Bradfield Southend their recommendation was that if required/needed only one site be brought forward for allocation. Their preference would be for part of BRAD5.
BRAD6	Land to the rear Ash Grove, Bradfield Southend	Paddock and informal recreation	Residential	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential - more vulnerable	No	The site is at low risk of flooding. The site is not proposed for allocation. The AONB Unit and Natural England have advised that development would result in an incongruous extension far beyond the settlement. This would result in harm to the AONB and would not be in keeping with the linear pattern of development. There are highways concerns - adoptable access and 2 metre footway onto Cock Lane would not be achievable. Impact on the capacity of Cock Lane. There is a covenant on the site which could impact upon availability. This is not an issue affecting the preferred site for allocation.

HELAA REF	SITE	EXISTING LAND USE(S)	USE(S) PROPOSED BY SITE PROMOTER	IS THE SITE LOCATED WITHIN FLOOD ZONE 1?	IS THE SITE WITHIN FLOOD ZONE 3 PLUS CLIMATE CHANGE?	IS LESS THAN 10% OF THE SITE AT RISK OF SURFACE WATER FLOODING IN THE 1 IN 1000 YEAR FLOOD EVENT?	IS LESS THAN 10% OF THE SITE WITHIN THE HIGHEST CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS <0.025M BELOW THE SURFACE IN THE 1 IN 100 YEAR FLOOD EVENT) OR THE 1 IN 100 YEAR JACOBS GROUNDWATER EMERGENCE EXTENT?	IS LESS THAN 75% OF THE SITE WITHIN THE SECOND HIGHEST RISK CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS 0.025M AND 0.5M BELOW THE SURFACE IN A 1 IN 100 YEAR FLOOD EVENT)?	IS THE SITE AT RISK OF RESERVOIR FLOODING?	IS THE SITE WITHIN AN AREA HIGHLIGHTED ON THE HISTORIC FLOOD MAP?	DOES THE SITE CONTAIN A MAIN RIVER?	DOES THE SITE CONTAIN AN ORDINARY WATERCOURSE?	FLOOD RISK VULNERABILITY OF PROPOSED USE	IS THE SITE PROPOSED AS AN ALLOCATION WITHIN THE LOCAL PLAN REVIEW?	CONCLUSIONS
BRM3	"CHANGE TO USE PROMOTED" Larkwhistle Farm, Brimpton Road, Brimpton Common	Agriculture	Residential	Yes	No	Yes	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	No	No	No	No	Employment - less vulnerable	No	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. The proposed use is 'less vulnerable'. The proposed uses are 'less vulnerable'. There are constraints which mean the site is unlikely to be suitable within the next 15 years - it is within the AWE Aldermaston Detailed Emergency Planning Zone and advice from the Council's Emergency Planning Team is that development would be unsuitable.
BUR12	Land at Green Park, Kirton's Farm Road, Reading	Grassland	Employment (any B-class use)	No, the majority of the site lies within Flood Zone 3a (46%) and Flood Zone 2 (49%). 1% of the site lies within Flood Zone 1, and a further 1% lies within Flood Zone 3b.	Yes, 82% of site will fall within Flood Zone 3a.	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	Yes	No	Yes - 35% of site (southern part) is shown on the Historic Flood Map as having flooded. The date and cause of the flooding is not specified.	No	No	Employment (any B-class use) - less vulnerable	No	The site is at risk of flooding. The site is not proposed for allocation.
BUR14	Heron's Nest, Station Road, Theale	Former quarry, land being reinstated	Employment, renewable energy	The majority of the site is located within Flood Zone 1 (73%). 16% is in Flood Zone 2, 10% in Flood Zone 3a, and 1% in Flood Zone 3b.	Yes, 26% of the site will fall in Flood Zone 3a.	No, 32% of the site is expected to be affected in a 1 in 1000 year flood event.	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	No	2% of site (northern part) is shown to have flooded in June 1971 due to channel exceedance. The north west corner of the site (2% of the site area) is within the Historic Flood Map outline, where the adjacent lake flooded into the site boundary during the January 2003 flood event.	No	Yes	Employment - less vulnerable Renewable energy - water compatible	No	The site is at risk of flooding. The site is not proposed for allocation.
CA15	Land at Long Lane, North of Highwood Close and Shaw Cemetery, Long Lane, Newbury	Agriculture	Residential	Yes	No	No, 37% of the site is expected to be affected in a 1 in 1000 year flood event.	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	Yes	No	No	No	No	Residential - more vulnerable	No	The site is not proposed for allocation. Issues which would need to be resolved relate to highways and access and further information would be required on ecology, heritage and landscape. As the site is at risk of surface water flooding the site may be developable only in part and attenuation measures would need to be incorporated into the development. Development of this site should be considered as part of a future potential strategic site to the north of Newbury in order to ensure the most sustainable outcomes. Development would require access from the B4009 to the A339. A further strategic site at Newbury would be a consideration for a future review of the Local Plan.
CHI9	The Old Nursery, Bradley Court Lane, Chieveley, RG18 9XZ	Agriculture (former nursery)	Employment, renewable energy or mix of the two	Yes	No	Yes	Yes	Yes	No	No	No	No	Employment (less vulnerable), renewable energy (essential infrastructure) or mix of the two	No	The site is not proposed for allocation. There are constraints which mean the site is unlikely to be suitable within the next 15 years - there are highways concerns and the Council's Highways Team does not support the site. Development would be inappropriate in the context of the character of the landscape.
CHI23	Land at Chieveley Glebe, Chieveley	Agriculture	Residential and burial ground	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential (more vulnerable) and burial ground	Yes	The site is at low risk of flooding and is proposed for allocation.
GRE10	Land east of Pigeons Farm Road, Greenham, Newbury	Golf course	Residential and public space in accordance with the relevant requirement	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential (more vulnerable) and public space (water compatible) in accordance with the relevant requirement	No	The site is at low risk of flooding. The site is not proposed for allocation. The site is adjacent to the existing settlement at Greenham. The site is in close proximity to a range of services and facilities, is served by public transport, and can make use of existing connections to encourage non-car travel. However, the site would introduce residential development where none currently exists, and would not follow the existing rhythm of development. The site is on top of a ridge and reads as part of the setting of the golf course and adjacent recreation ground, and the wider rural character and Greenham Common.
GS1	Land west of Spring Meadows, Allendale Farm, Great Shefford	Agriculture	Residential	Yes	No	Yes	Yes	Yes	No	No. The Jacobs 2014 groundwater emergence mapping indicates that the site was subject to groundwater flooding in 2014, however the Lead Local Flood Authority have commented that groundwater emergence was recorded during the 2014 event at north-east quarter of the site.	No	No	Residential - more vulnerable	Yes	The majority of the site is at low risk of flooding. The site is proposed for allocation. Whilst the north-east quarter of the site was affected by groundwater emergence during a 2014 flood event, development will be avoided in this area. The site specific policy for the site sets out that development must not take place within this area of the site.
HER4	Land adjacent to Station Road, Hermitage	Part agriculture. The site includes the former Hermitage Station Masters House and a depot (which are currently in C3 and B1/B8 use respectively), a disused railway platform and a substantial disused railway embankment, which runs the entire length of the south eastern boundary of the site.	Residential	Yes	No	No, 17% of the site is expected to be affected in a 1 in 1000 year flood event.	Yes	Yes	No	No	No	No	Residential - more vulnerable	Yes	A small part of the site (19%) is at risk of surface water flooding, and using the sequential approach development could be accommodated outside of this area. The site is proposed for allocation.
HER5	Land at Kin Farm, west of B4009, Hermitage, RG18 9SA	Agriculture	Residential, community facility to complement residential development	Yes	No	No, 16% of the site is expected to be affected in a 1 in 1000 year flood event.	Yes	Yes	No	No	No	No	Residential (more vulnerable), community facility (less vulnerable) to complement residential development	No	A small part of the site (16%) is at risk of surface water flooding, and using the sequential approach development could be accommodated outside of this area. The site is not proposed for allocation, part of the site is suitable for development. However its potential for allocation needs to be considered in conjunction with the placing of Hermitage in the settlement hierarchy. Hermitage is identified as a Service Village meaning that it is suitable for a limited amount of development. It is considered that development of this site, alongside the others in Hermitage would be too great for the village. In particular there are already two existing allocations within the Housing Site Allocations Development Plan Document. The Landscape Sensitivity and Capacity Assessment recommends that HER4 is preferable in landscape terms should a choice need to be made.

HE/LAA REF	SITE	EXISTING LAND USE(S)	USE(S) PROPOSED BY SITE PROMOTER	IS THE SITE LOCATED WITHIN FLOOD ZONE 1?	IS THE SITE WITHIN FLOOD ZONE 3 PLUS CLIMATE CHANGE?	IS LESS THAN 10% OF THE SITE AT RISK OF SURFACE WATER FLOODING IN THE 1 IN 1000 YEAR FLOOD EVENT?	IS LESS THAN 10% OF THE SITE WITHIN THE HIGHEST CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS <0.025M BELOW THE SURFACE IN THE 1 IN 100 YEAR FLOOD EVENT) OR THE 1 IN 100 YEAR JACOBS GROUNDWATER EMERGENCE EXTENT?	IS LESS THAN 75% OF THE SITE WITHIN THE SECOND HIGHEST RISK CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS 0.025M AND 0.5M BELOW THE SURFACE IN A 1 IN 100 YEAR FLOOD EVENT)?	IS THE SITE AT RISK OF RESERVOIR FLOODING?	IS THE SITE WITHIN AN AREA HIGHLIGHTED ON THE HISTORIC FLOOD MAP?	DOES THE SITE CONTAIN A MAIN RIVER?	DOES THE SITE CONTAIN AN ORDINARY WATERCOURSE?	FLOOD RISK VULNERABILITY OF PROPOSED USE	IS THE SITE PROPOSED AS AN ALLOCATION WITHIN THE LOCAL PLAN REVIEW?	CONCLUSIONS
KIN3	Land east Kiln Farm, Kintbury, RG17 9XD	Arable	Residential	Yes	No	Yes	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	No	No	No	No	Residential - more vulnerable	No	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. The site is not proposed for allocation. Only a limited amount of development will be suitable in Kintbury. Within the revised settlement hierarchy Kintbury is identified as a Service Village, meaning it has a limited range of services and facilities so is therefore suitable for only a limited number of dwellings. Traffic related concerns are perhaps the biggest single issue for the local community in Kintbury and it is acknowledged that despite there being a mainline railway station in the village, the degree of car dependency is still likely to be high. It is acknowledged that the western part of the site is well connected to the settlement edge when considered alongside the site allocated in the Housing Site Allocations development Plan Document (HSA DPD) and subject to certain mitigation and enhancement measures identified in the LSA (2011), this part of the site only could be sensitively developed to conserve and enhance the special qualities and natural beauty of the landscape of the AONB. However, the site also needs to be thought about alongside any other sites where there is potential for development, in particular KIN6. Bearing in mind the particular features of Kintbury it is considered that the development of both KIN3 and KIN6 would be too great for the village particularly as there is an existing allocation in the HSA DPD adjoining KIN3. Although both KIN6 and KIN3 are predominantly neutral in their sustainability effects KIN6 is closer to a larger number of facilities and services.
KIN4	Land north of Kiln House, Laylands Green, Kintbury, RG17 9UD	Residential dwelling and garden, and paddock	Residential	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential - more vulnerable	No	The site is at low risk of flooding. The site is not proposed for allocation. Only a limited amount of development will be suitable in Kintbury. Within the revised settlement hierarchy Kintbury is identified as a Service Village, meaning it has a limited range of services and facilities so is therefore suitable for only a limited number of dwellings. Traffic related concerns are perhaps the biggest single issue for the local community in Kintbury and it is acknowledged that despite there being a mainline railway station in the village, the degree of car dependency is still likely to be high. Even though a site along Laylands Green has been allocated for development in the current Local Plan, this site is still detached from the main existing settlement further north. Laylands Green has a rural character and there is currently a clear linear pattern of development along this part of the road. A more intensive development in this location would be out of character with the existing settlement form. Although most of the area covered by this promoted site was considered acceptable in the Landscape Capacity Assessment (2011) it was on the understanding that the site would only be suitable for a very limited development of very low density to match that existing on the site and located to ensure the retention and protection of the existing woodland and other valuable trees and hedges. The site would therefore be unable to accommodate up to 15 dwellings.
KIN6	Land adjoining The Haven, Kintbury, RG17 9AU	Paddock/wasteland	Residential	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential - more vulnerable	Yes	The site is at low risk of flooding and is proposed for allocation.
LAM6	Land west of Ramsbury Road, Walker Logistics Holding Ltd, Membury, Lambourn Woodlands	Employment (whole site) agriculture (area suitable for development)	Employment (B8 storage and distribution)	Yes	No	Yes	Yes	Yes	No	No	No	No	Employment (B8 storage and distribution) - less compatible	Yes	The site is at low risk of flooding and is proposed for allocation.
LAM10	Land to the south of Trinity Grain, Ramsbury Road, Membury	Vacant	Office. The landowner is also exploring other options for redeveloping the site for commercial/ industrial purposes including open storage and/or warehouse use	Yes	No	Yes	Yes	Yes	No	No	No	No	Employment - less vulnerable	Yes	The site is at low risk of flooding and is proposed for allocation.
MID4	Land north of the A4 Bath Road, junction of New Hill Road, Woodhampton	Grassland	Residential	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential - more vulnerable	Yes	The site is at low risk of flooding and is proposed for allocation.
MID5	Land east of Colthrop Industrial Estate, south of A4 Bath Road, Thatcham	Agriculture	Employment (B2/B8 uses)	Yes	No	No, 26% of the site is expected to be affected in a 1 in 1000 year flood event	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	Yes	No	No	No	No	Employment (B2/B8 uses) - less vulnerable	Yes	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. A small part of the site (26%) is at risk of surface water flooding, and using the sequential approach development could be accommodated outside of this area. The proposed use is 'less vulnerable'. The site now has planning permission for an employment use. The site is proposed for allocation.
PAD4	Land adjacent Padworth IWMF, Padworth Lane, Lower Padworth	Oil terminal	Employment	Yes	No	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	Yes	No	No	No	No	Employment - less vulnerable	Yes	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. The proposed use is 'less vulnerable'. The site is proposed for allocation.
SCD4	Land to the north of Newbury, Newbury	Agriculture	Residential-led mixed use development (retail, leisure/recreation, community facility)	Yes	No	Within the western site parcel, 21% of the site is expected to be affected in a 1 in 1000 year flood event	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. The Lead Local Flood Authority have commented that the high groundwater levels have been designed for under the existing 'North Newbury' development site proposals.	Yes	No	The site is not within the Recorded Flood Outlines dataset. However large volumes of floodwater were reported to flow through the valley in the eastern land parcel (around Shaw Farm), during the July 2007 event. Flood water affected the barn and houses on the property, and led to the overlapping of the lakes downstream of the site, causing flooding of Trinity School and the Vodafone headquarters.	No	No	Residential-led mixed use development (retail, leisure/recreation, community facility) Residential - more vulnerable Retail & community facility - less vulnerable Leisure / recreation - less vulnerable or water compatible depending on use.	No	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. A small part of the site (21%) is at risk of surface water flooding, and using the sequential approach development could be accommodated outside of this area. The site is not proposed for allocation. Access via the Connection, a private road, seriously inhibits development of site. Highway Officers consider that a route through site CA15 to the B4009 would need to be provided. Development of this site should be considered as part of a future potential strategic site to the north of Newbury in order to ensure the most sustainable outcomes. Development would require access from the B4009 to the A339. A further strategic site at Newbury would be a consideration for a future review of the Local Plan.
SM8	Land at Perrins Farm, Beech Hill, Mortimer	Agriculture	Conversion of existing agricultural buildings (3,168 sq.m) to offices	Yes	No	Yes	Yes	Yes	No	No	No	No	Employment - less vulnerable	No	The site is at low risk of flooding. The site is not proposed for allocation. Unsustainable location. Poor accessibility to local services.
THA20	North East Thatcham	Agriculture	Residential-led mixed use development	Yes	No	No, 19% of the site is expected to be affected in a 1 in 1000 year flood event	Yes	Yes	No	No	No	No	Residential-led mixed use development - more vulnerable	Yes	A small part of the site (19%) is at risk of surface water flooding, and using the sequential approach development could be accommodated outside of this area. The site is proposed for allocation.
THA24	Lower Way Farm, Lower Way, Thatcham	Commercial	Office	No, the majority of the site lies within Flood Zone 3a with two small areas of the site within Flood Zone 2.	Yes. The entire sites will fall in Flood Zone 3a	Yes	Yes	Yes	No	No	No	No	Employment - less vulnerable	No	The site is at risk of flooding and is not proposed for allocation.
THE1	Whitehart Meadow, High Street, Theale	Agriculture	Residential with small employment element	The majority of the site is located within Flood Zone 1 (99%). The remainder of the site is within Flood Zone 2.	No	Yes	No, however the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event.	Yes	No	Yes - 95% of the site is shown to have flooded (the area not to have flooded is the south eastern boundary) in June 1971. The eastern part of the site is shown to have flooded in January 2003. The causes on both occasions was channel exceedance along the Sulham Brook.	No	No	Residential (more vulnerable) with small employment element (less vulnerable)	Yes	Groundwater levels are high, although the Jacobs Groundwater Flood Risk modelling does not show the site to be at risk of groundwater emergence in either a 1 in 30 or 1 in 100 year flood event. Part of the site lies within Flood Zone 2 however development is not proposed in this area. Whilst much of the site is on the historic flood map, the site is predominantly within Flood Zone 1. The site is proposed for allocation.

HELAA REF	SITE	EXISTING LAND USE(S)	USE(S) PROPOSED BY SITE PROMOTER	IS THE SITE LOCATED WITHIN FLOOD ZONE 1?	IS THE SITE WITHIN FLOOD ZONE 3 PLUS CLIMATE CHANGE?	IS LESS THAN 10% OF THE SITE AT RISK OF SURFACE WATER FLOODING IN THE 1 IN 1000 YEAR FLOOD EVENT?	IS LESS THAN 10% OF THE SITE WITHIN THE HIGHEST CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS <0.025M BELOW THE SURFACE IN THE 1 IN 100 YEAR FLOOD EVENT) OR THE 1 IN 100 YEAR JACOBS GROUNDWATER EMERGENCE EXTENT?	IS LESS THAN 75% OF THE SITE WITHIN THE SECOND HIGHEST RISK CATEGORY IN THE JBA GROUNDWATER MAP (GROUNDWATER IS 0.025M AND 0.5M BELOW THE SURFACE IN A 1 IN 100 YEAR FLOOD EVENT)?	IS THE SITE AT RISK OF RESERVOIR FLOODING?	IS THE SITE WITHIN AN AREA HIGHLIGHTED ON THE HISTORIC FLOOD MAP?	DOES THE SITE CONTAIN A MAIN RIVER?	DOES THE SITE CONTAIN AN ORDINARY WATERCOURSE?	FLOOD RISK VULNERABILITY OF PROPOSED USE	IS THE SITE PROPOSED AS AN ALLOCATION WITHIN THE LOCAL PLAN REVIEW?	CONCLUSIONS
THE7	Former Theale Sewage Treatment Works, Blossom Lane, Theale, RG7 5SB	Former sewage treatment works	Residential	The majority of the site is located within Flood Zone 1 (73%). The remainder of the site is within Flood Zone 2.	No	Yes	Yes	Yes	No	The east of the site (27% of the site) is within the Recorded Flood Outline dataset. Flooding to the east of the site occurred on 6 January 2003 and 6 June 1971, as a result of channel exceedance along the Sulham Brook.	No	No	Residential - more vulnerable	Yes	Part of the site lies within Flood Zone 2 however development is not proposed in this area. A small part of the site is included on the historic flood map. The site is proposed for allocation.
TIL13	Land at Pincents Lane, Tilehurst	Former golf course (no structures remain on the site)	Residential, public open space, retail to support the sustainability of development, and small-scale commercial uses. The site promoter has also indicated that there could be the potential inclusion of land for a primary school subject to the number of dwellings delivered	Yes	No	Yes	Yes	Yes	No	No	No	No	Residential (more vulnerable), public open space (water compatible), retail (less vulnerable) to support the sustainability of development, and small-scale commercial uses. The site promoter has also indicated that there could be the potential inclusion of land for a primary school (more vulnerable) subject to the number of dwellings delivered	No	The site is at low risk of flooding. The site is not proposed for allocation. In principle, part of the site is suitable for development. A Landscape Capacity Assessment has recommended that part of the site would be acceptable for development without resulting in harm to the adjacent AONB. The site is located adjacent to the settlement of Tilehurst, and is close to local services, facilities, and public transport nodes. Within the settlement hierarchy, the Eastern Urban Area (which includes Tilehurst) is identified as an Urban Area due to the wide range of services available. Urban Areas are the focus for the majority of development. There are some factors and effects that would require further investigation, planning, and mitigation to ensure that the most sustainable outcomes in relation to ecology, heritage, minerals, transport, and the timely delivery of infrastructure are achieved. However, Members have raised concerns that development would have an unacceptable impact on the local highway network, and they have recommended that the site is not allocated.