
Flood Risk Sequential Test Report

Old Forest Road, Wokingham

Flood Risk Sequential Test

Old Forest Road, Wokingham



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1. Introduction

- 1.1. This Flood Risk Sequential Test Report has been prepared in support of a planning application for 53 dwellings with associated works at Land to the North of Old Forest Road, Wokingham.
- 1.2. The site is located within the administrative area of Wokingham Borough Council, and is a greenfield site consisting of two parcels of grassland separated by a tree line to the centre. Trees bound the west, south and east of the site with the recently constructed North Wokingham Distributor Road (Toutley Road) to the north.
- 1.3. The description of development for the scheme is as follows:

“Erection of 53no. dwellings with associated landscaping, parking, drainage, open space and other associated works”
- 1.4. According to the Environment Agency’s (EA) online map for flooding, the site is located within Flood Zone 1 at the lowest risk of flooding. There are areas of surface water flooding in the west and south of the site.
- 1.5. The National Planning Policy Framework (NPPF), revised in December 2024, sets out the relevant requirements to undertaking development in areas identified as at potential risk of flooding, and Paragraph 170 states that development should be directed away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere (NPPF, Paragraph 170). Directing development away from areas at highest risk is the crux of the Sequential Test, and making a development safe without increasing flood risk elsewhere is the basis for the Exceptions Test.
- 1.6. As a result, conformity with the Sequential Test is required at the site, as the development would result in a net increase in the number of dwellings at the site. As the site is in Flood Zone 1, the Exceptions Test is not required.
- 1.7. This Report first sets out a brief description of the site and proposals, then it will set out the methodology for the identification of alternative sites, followed by an assessment for the possible identified alternative sites. As the report will demonstrate, the Sequential Test is considered to be passed as no suitable, available, developable/ deliverable sites have been identified within the specified search area.

2. Site and Proposals

- 2.1. The site extends to 1.6ha and lies adjacent to the built up area of Wokingham, to the south east, and beyond the site to the north is the North West Distributor Road (NWDR) associated with the North Wokingham Strategic Development Location, now known as Toutley Road.
- 2.2. The site comprises greenfield land screened on its southern, western and eastern boundaries by mature vegetation. There are no existing buildings or areas of hard landscaping on site. There are approximately 28 trees located within the site and around its perimeters which are protected by Tree Protection Order (TPO) (ref. TPO-0507-1989) as illustrated within the accompanying Arboricultural Survey.
- 2.3. Access to the site is taken off Old Forest Road through an existing route. Residential development is prevalent along either side of the access road, with a mixture of large detached properties directly south of the site along Old Forest Road and housing estates at Wayside to the east of the site and along Toutley Close beyond the southern boundary.
- 2.4. Old Forest Road Meadows Suitable Alternative Natural Greenspace (SANG) is located to the north of the site, beyond Toutley Road, and to the west.
- 2.5. The site is approximately 3.5km from Wokingham town centre, which provides a wide range of facilities including a Waitrose and Aldi supermarket, a number of smaller convenience stores, a variety of restaurants, public houses, cafés and places of worship. More locally, approximately 250m southeast of the site is a Co-Op supermarket and The Dog and Duck pub. Emmbrook Junior and Infant School are located 800m from the site as well as Emmbrook Sixth Form School which is approximately 1.2km away. Lowether Road playground and Emmbrook Sports & Social club are located off Old Forest Road, 280m from the site.
- 2.6. Wokingham train station, located c.2.5km from the site provides regular Great Western Railway and South Western Railway services to Reading, Gatwick Airport and London Waterloo. The station is also services a number of local bus routes.

Policy Designations

- 2.7. Under the adopted Development Plan (consisting of the Core Strategy 2010 and the Managing Development Delivery, or MDD, DPD 2014) the site is designated as open countryside where new development is generally restricted. However, the site forms part of a wider area which is a draft allocation set out within Policy SS14.20 of the Local Plan Update: Proposed Submission Plan (LPUS). Policy SS14.20 allocates Land West of Old Forest Road for residential development and provides an approximate capacity of 50 dwellings for the 3.5ha site.

Planning History

- 2.8. There is no relevant planning history for residential development on the site.

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Wokingham Borough Council Strategic Flood Risk Assessment

- 2.9. WBC carried out a Level 2 Strategic Flood Risk Assessment in August 2023. The Council's Sustainability Appraisal was published in November 2021.

Long term flood risk

- 2.10. The Environment Agency (EA) provides data on the long term flood risk of an area from surface water, rivers and the sea and other sources (groundwater and reservoirs).
- 2.11. The area of the proposed development has been assessed as being at very low chance of surface water flooding between 2040 and 2060 and has been assessed as having a very low chance of rivers and sea flooding between 2036 and 2069.

3. Methodology for the Identification of Alternative Sites

3.1. The National Planning Policy Framework (NPPF), revised in 2024, sets out the relevant requirements with regard to undertaking development in areas identified at potential risk of flooding, such as the site at Old Forest Road, Wokingham.

3.2. Paragraph 181 states that:

“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”

3.3. As set out in the NPPF:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.” (Paragraph 170.)

3.4. Directing development away from areas at highest risk of flooding is the crux of the Sequential Approach, and making a development safe without increasing flood risk elsewhere is the basis for the Exceptions Test.

3.5. The site is located in the administrative area of Wokingham Borough Council, constitutes greenfield land, and is in a sustainable location for development. The site is located in Flood Zone 1, as identified by the Environment Agency’s online map for flooding (see Figure 3.1) however, there is an area of surface water flooding in the centre of the site (see Figure 3.2). Therefore, procedurally, the Applicant needs to demonstrate that the proposals for the site could not be delivered in an area at lower risk of flooding, whilst having the same results and benefits.

3.6. The site at Old Forest Road is an allocated site in the emerging Wokingham Borough Council Local Plan. In allocating the site, the Council has undertaken its own Strategic Flood Risk Assessment (SFRA) which

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carried out a Sequential Test for the site. Although this concluded that the site passes, as the site is submitted in advance of adoption of the Local Plan Update, a site-specific Sequential Test is required.

Figure 3.1: Flood Zone Mapping

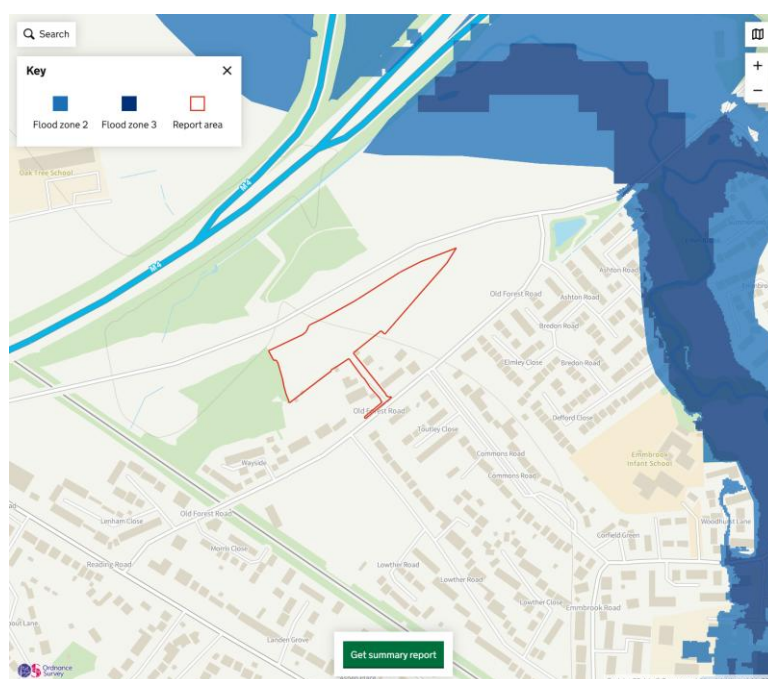
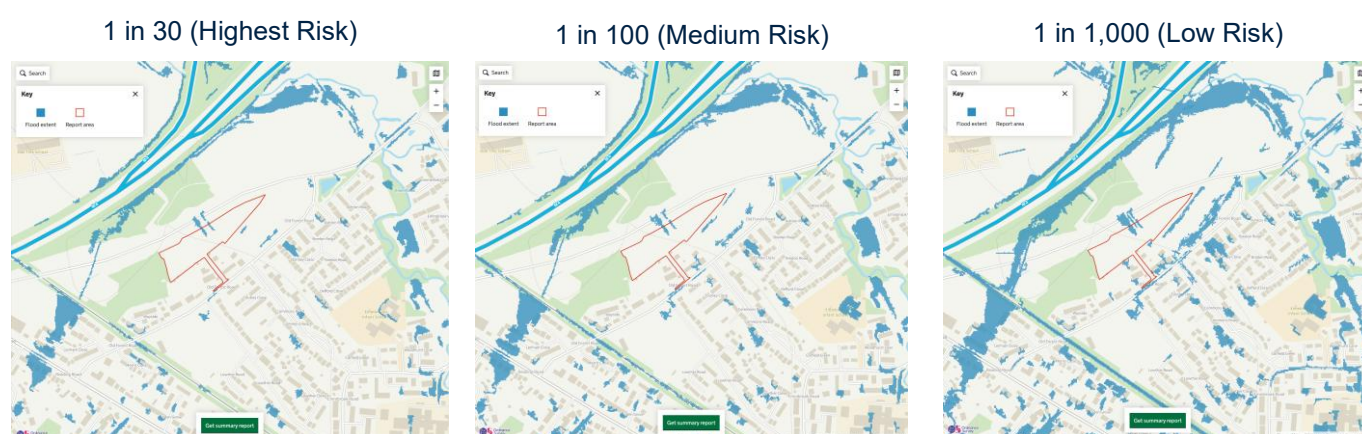


Figure 3.2: Surface Water Flood Map



- 3.7. The procedure for undertaking the Sequential Test for sites is set out within the Planning Practice Guidance (PPG) which sits alongside the NPPF. The PPG recommends that the applicants should contact the relevant Local Planning Authority (LPA) to discuss the search area and parameters which should be used for alternative sites for the proposed development.

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3.8. The parameters of the proposed search were agreed with officers from WBC in May 2025.

Search Parameters for Alternative Sites

3.9. There are three key aspects that were considered relevant when setting the search parameters for the assessment of alternative sites through the Sequential Test process, and guidance is provided in national planning policy, PPG and WBC's Strategic Flood Risk Assessment in relation to:

- Location/Geographical area over which the test is to be applied
- Flood Risk
- Availability

3.10. The understanding of these factors is set out below.

Location/Geographical Area

3.11. The PPG states that, *"For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies"* (Paragraph 027 Reference ID: 7-027-20220825).

3.12. The site is located within the WBC authority area, and it was agreed with WBC Officers that a suitable search area would include the whole of Wokingham Borough. The area of search should include any sites of a single dwelling or more, particularly where these sites are closely located to one another.

Flood Risk

3.13. For the purposes of the assessment, only sites that were considered to be of lower flood risk should be considered as suitable alternative sites.

3.14. As the application site is currently located in Flood Zone 1, any sites within Flood Zones 2 and 3 have been excluded from the area of search. Similarly, as the site has areas of highest risk of surface water flooding (1 in 30), sites with areas of medium (1 in 100) to low risk (1 in 1000) of surface water flooding have been included.

Availability

3.15. The PPG notes that a pragmatic approach on the availability of alternative sites should be taken. Reasonably available sites must be both 'deliverable' and 'developable' as defined in the NPPF:

*"To be considered deliverable, sites for housing should be **available now**, offer a **suitable location for development now**, and be **achievable with a realistic prospect** that housing will be delivered on the site within five years. In particular:*

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear*

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evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"*

And:

"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

Various factors therefore will need to be considered during any assessment of alternative sites to determine whether they have reasonable prospect for delivering housing within five years. This is likely to include the current use of the site, site ownership, current proposals or constraints to delivery, previous planning history, and whether there is a reasonable prospect of site constraints or any previous refusals for development being overcome."

- 3.16. For the Sequential Test, it is considered that sites which had commenced development could not be considered available. Similarly, it is considered that sites where planning permission had lapsed, been refused or withdrawn could not be considered available, deliverable or developable.

Capacity

- 3.17. The test for the parameters of whether a site can be viewed as a suitable alternative is set out in Paragraph 174 of the NPPF as to whether a site is "*appropriate for the proposed development*". For the purposes of this assessment, a comparable site that could be suitable for development is regarded as a site capable of accommodating a similar level, density and type of development and is therefore of a comparable size. However, there will need to be consideration of disaggregation where a 'series' of smaller sites could, in combination, deliver the proposed scheme. The *R (Mead and Redrow) v SoS LUHC [2024] 279 (Admin)* High Court judgement is clear that there should be relationship between those smaller sites.
- 3.18. The Applicant's proposal is for the development of 53 dwellings and associated works.
- 3.19. Due to the site layout looking to deliver a mix of tenure, type and size of dwellings, any potential alternative disaggregated site should be able to accommodate a similar capacity and dwelling mix to the proposed development. Therefore, where a series of smaller sites have the ability to accommodate the proposed 53 dwellings, then these have been assessed within this Sequential Test.

Process

- 3.20. The process followed through the Sequential Test to sift sites down to a point in which flood risk is the only constraint for the site (for the purposes of this Sequential Test) is shown in Figure 3.3 below.

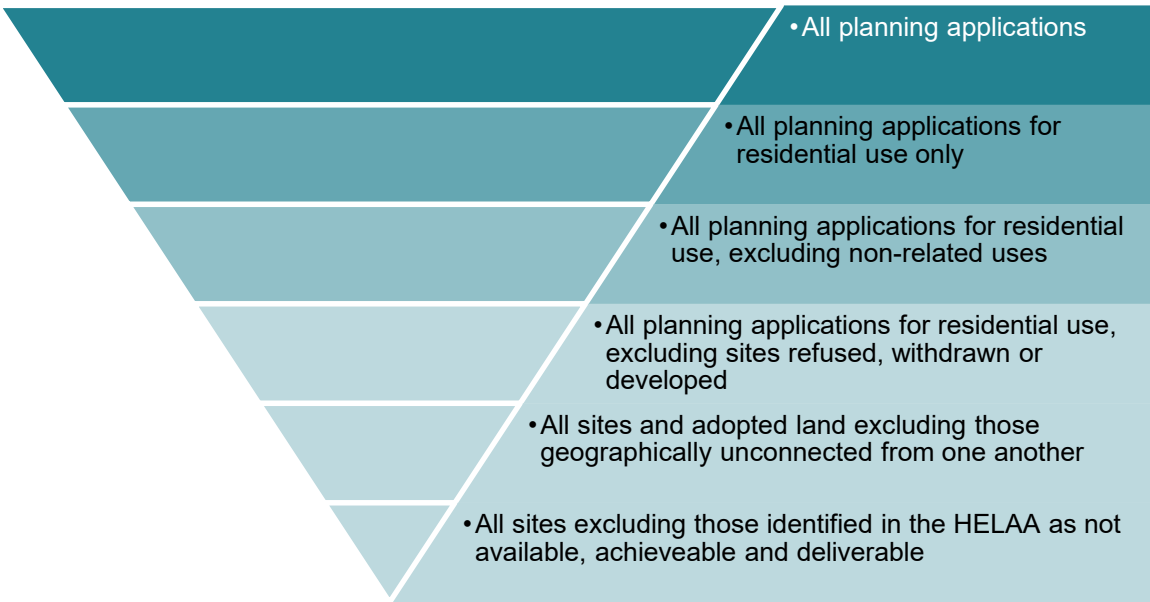
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3.21. As part of this process, WBC’s Housing and Economic Land Availability Assessment (HELAA) was reviewed and cross-referenced against the Glenigan dataset to ensure the sites included within the Sequential Test had been assessed as available, achievable and deliverable.

Figure 3.3: Site sifting hierarchy



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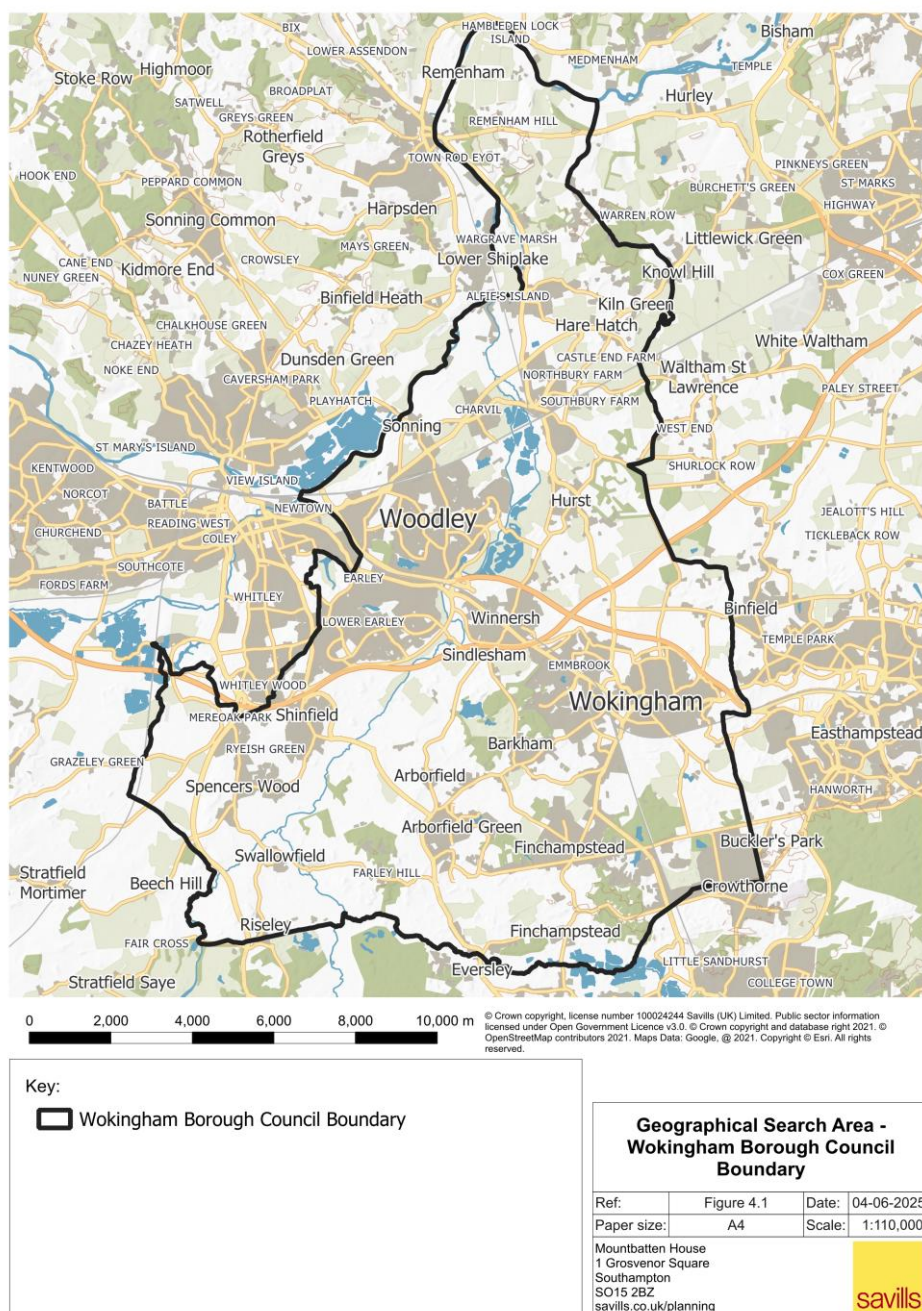
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4. Initial Assessment of Sites

- 4.1. As agreed with WBC officers, any potential sites within the Wokingham Borough Council boundary should be considered within the Sequential Test. This geographical boundary formed the basis of the report, as shown in Figure 4.1.

Figure 4.1: Geographical Search Area – Wokingham Borough Council Boundary



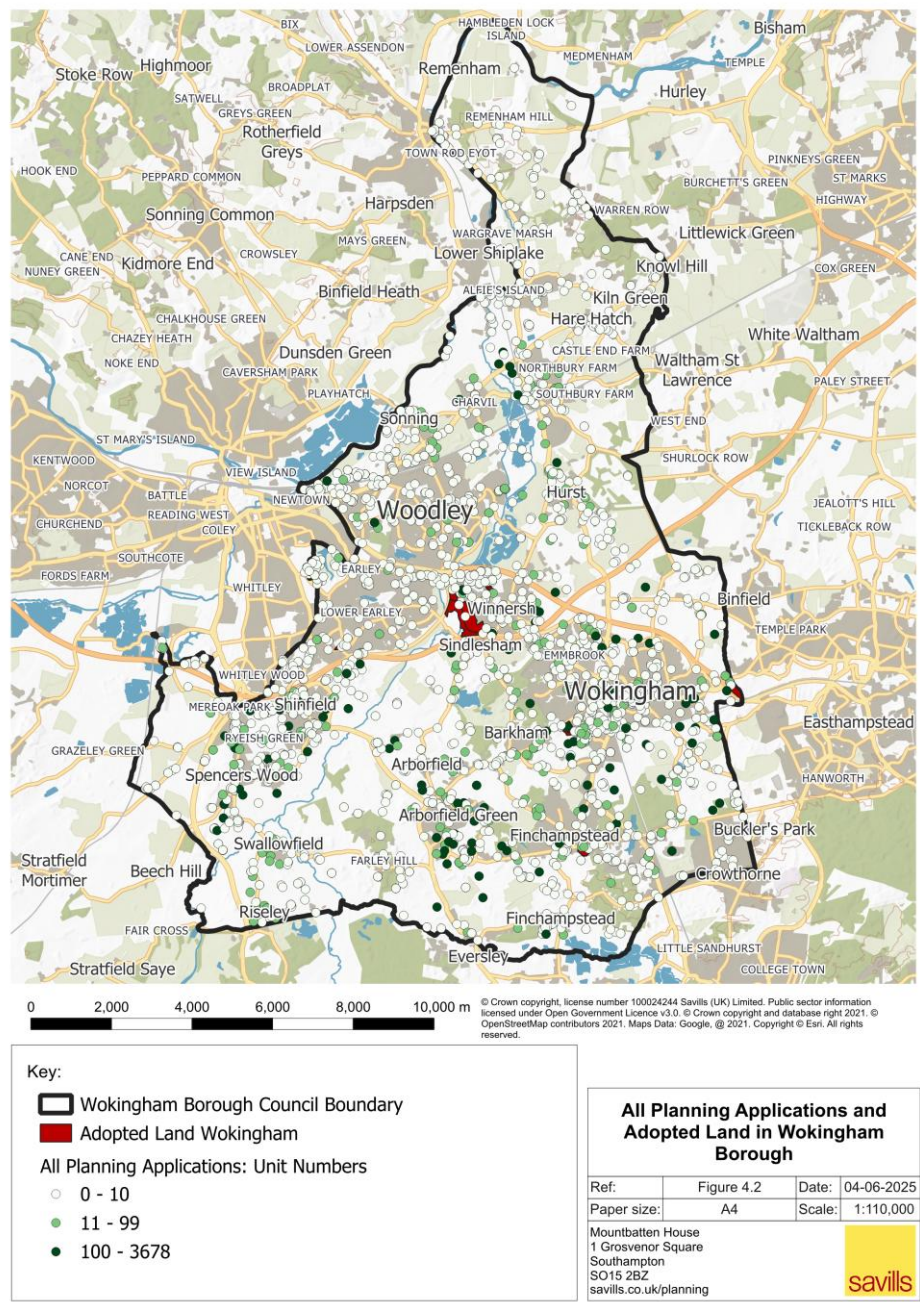
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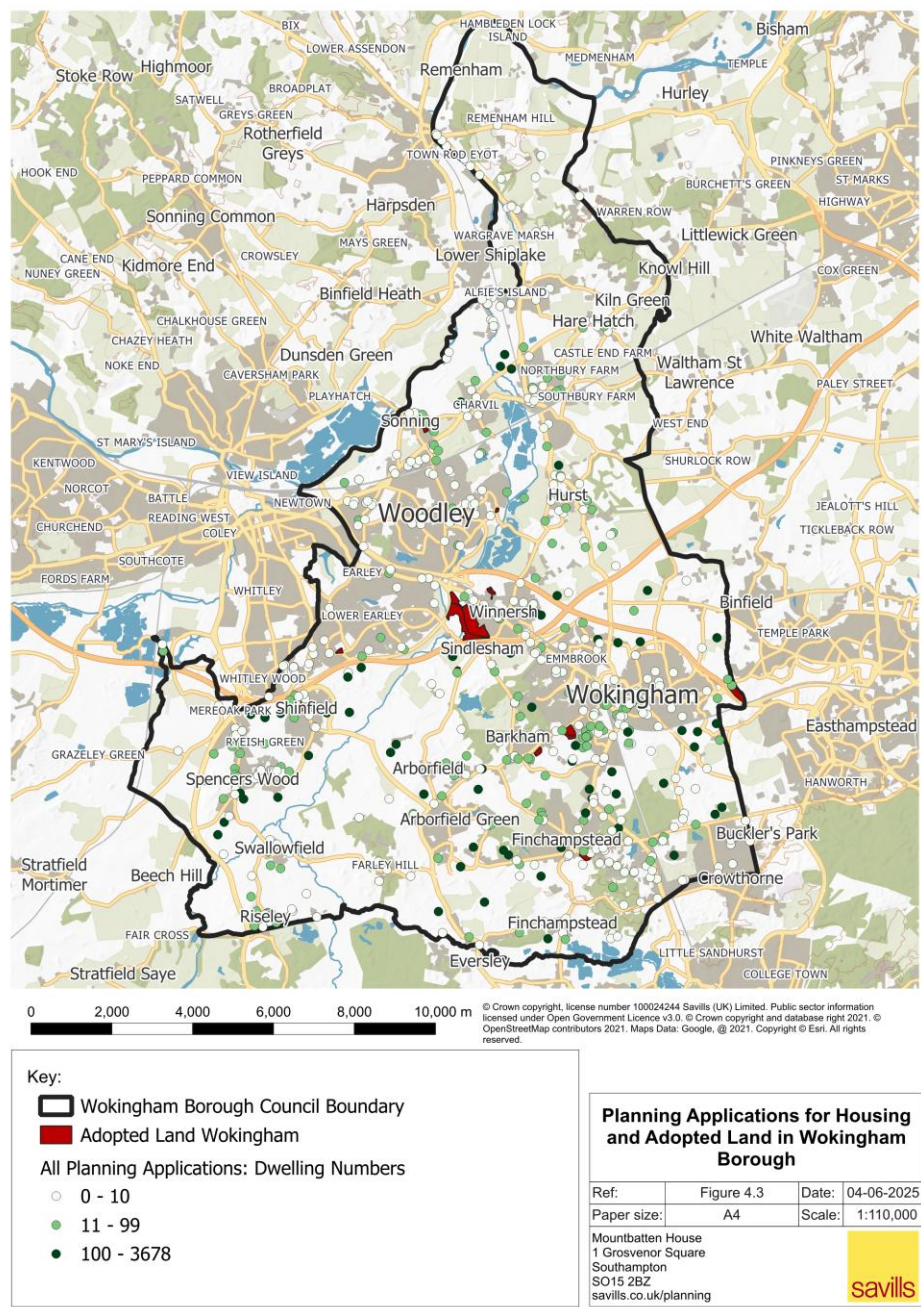
4.2. The Geographical Information System known as QGIS was then utilised to identify potential sites within the geographical boundary. The Glenigan Database was used to identify all planning applications and sites that had been submitted within the Wokingham Borough boundary since circa 2000, as well as current adopted land. This resulted in 3,374 applications being identified (see Appendix 1 and Figure 4.2).

Figure 4.2: All planning applications – 3,374 sites



4.3. Of the 3,374 applications, 640 related to residential developments or were duplicates of existing data (see Appendix 2 and Figure 4.3).

Figure 4.3: All planning applications related to residential developments – 640 sites



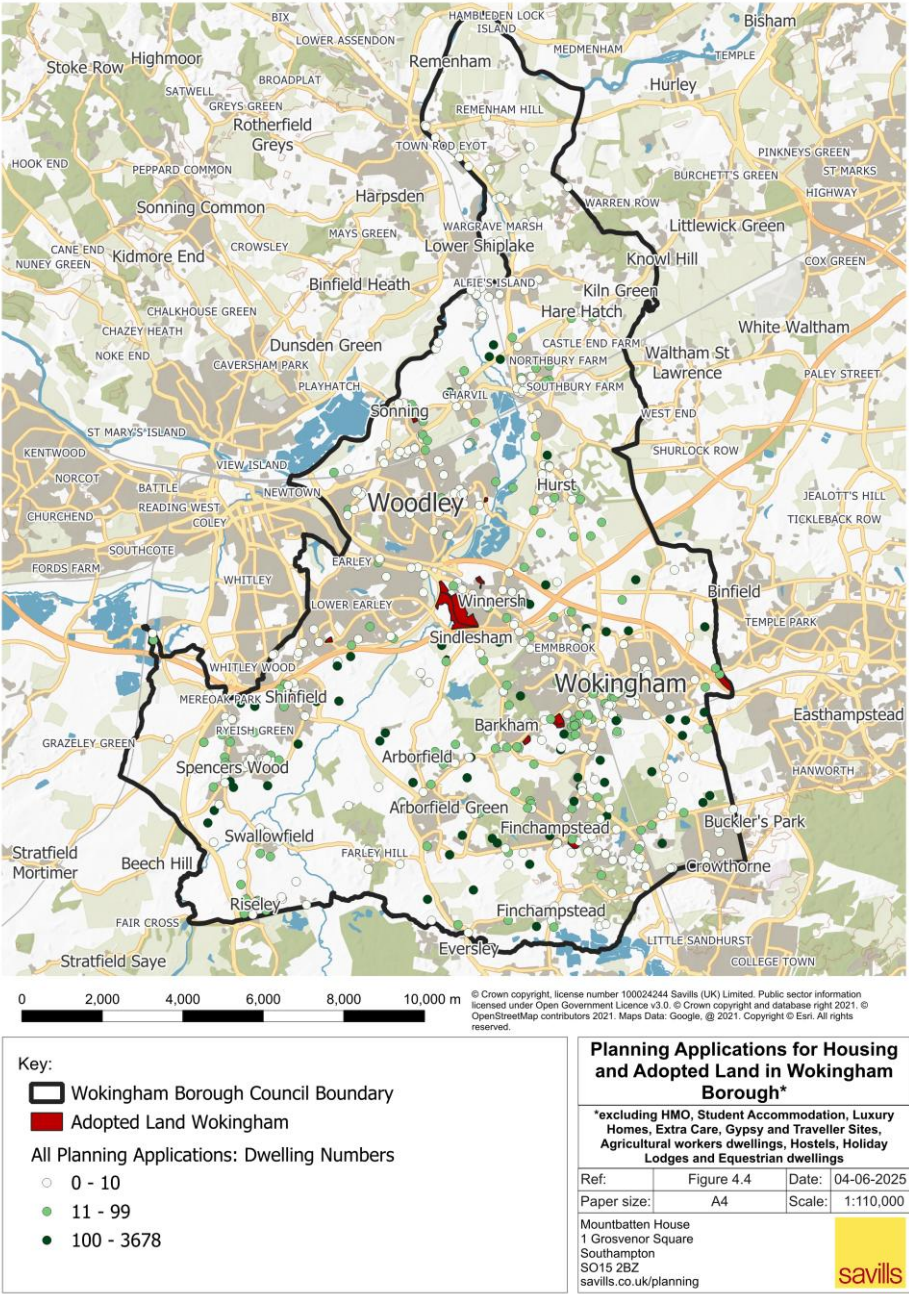
4.4. These applications were then further refined to exclude the following non-related uses: Houses in Multiple Occupation (HMO), student accommodation, luxury homes, extra care, gypsy and traveller sites, agricultural workers dwellings, hostels, holiday lodges, and equestrian. This resulted in 614 applications (see Appendix 3 and Figure 4.4).

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Figure 4.4: All planning applications excluding non-related uses – 614 sites



- 4.5. A further sift of sites which have been refused planning permission, have been withdrawn or are under construction/have been developed, as well as doing the same for adopted land in the Borough. This is due to the fact that a withdrawn or refused application on a site highlights that the proposed development cannot be seen as achievable for reasons such as viability or non-compliance with local or national policy.
- 4.6. Additionally, as per legislation and caselaw, sites that were found to be for planning proposals which would not result in a net increase in dwellings were discounted from the search. This was due to the fact they

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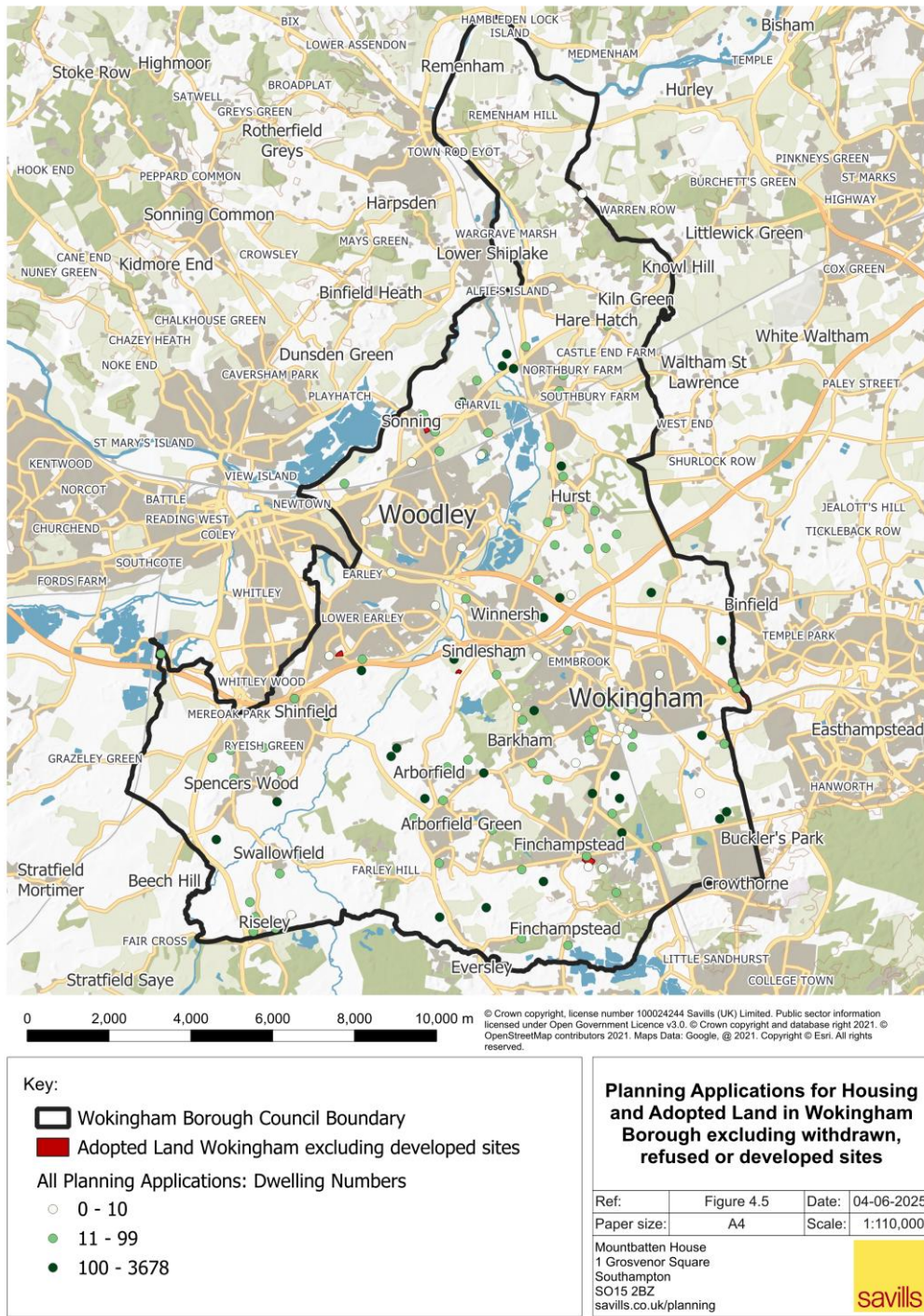
would not provide a net increase in dwellings which could be considered available for suitable alternatives. This resulted in a the number of available sites dropping to 130 (See Appendix 4 and Figure 4.5). This also left four adopted sites which have been carried through to the final stage of the Sequential Test from this point forward.

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Figure 4.5: All planning applications and Adopted Land excluding those sites which have been refused, withdrawn or developed – 130 sites



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- 4.7. In order to ensure that other potential 'windfall' sites were assessed, the Brownfield Land Register (BLR) was also used during the Sequential Test Search. Councils are required to prepare, maintain and publish a BLR giving a comprehensive list of brownfield sites across the authority area that are considered suitable for residential development. WBC updated its Brownfield Land Register in May 2024. With the exception of two sites, the sites within the BLR had been picked up within the Glenigan Database (see Appendix 8). Those sites which were not included within the Glenigan dataset were:
- 20 Denmark Street, Wokingham, RG40 2BB
 - 3 The Courtyard, Denmark Street, Wokingham, RG40 2AZ
- 4.8. Both of these sites have lapsed and therefore are not included within the Sequential Test. No additional sites were identified within the Brownfield Land Register.
- 4.9. Likewise, a review of all land for sale via Rightmove within the search area was undertaken as part of the Sequential Test search. The *R (Mead and Redrow) v SoS LUHC [2024] 279 (Admin)* judgement confirmed that reasonable available sites may include a series of smaller sites, but the 'series' is important, and it connotes that there should be relationships between the smaller sites proposed.
- 4.10. We have excluded looking at all available plots of land, which included individual houses for sale. Due to the evolved caselaw, it is presented that the lack of relationships between many small sites with capacity for only one or two additional dwellings would not be sequentially preferable. Hence, only nine sites were found to be for sale within the geographical boundaries of the site (see Appendix 5 and Figure 4.6).
- 4.11. When searching Rightmove, nine parcels of land were available within Wokingham Borough. Out of the seven identified, three were ruled out due to significant arboricultural constraints on site¹.
- 4.12. One had permission for three dwellings refused and an appeal dismissed², meaning the chances of developing the site are unlikely.
- 4.13. Another had a significant area of Flood Zone 3 covering the access and half of the site³.
- 4.14. The remaining sites were located on the Beech Hill Estate⁴, however, three of the four lots on the Beech Hill Estate are situated deep in the countryside and are divorced from any settlement and therefore would not be sequentially preferable to the proposed development site. As Lot 5 is adjacent to Beech Hill, it has

¹ Perimeter Road, Reading: https://www.rightmove.co.uk/properties/160283558#/?channel=COM_BUY; Simons Wood, Wokingham: https://www.rightmove.co.uk/properties/162664052#/?channel=COM_BUY; Land at Sandy Lane, Wokingham: https://www.rightmove.co.uk/properties/160339814#/?channel=COM_BUY

² Wokingham, Berkshire Site: https://www.rightmove.co.uk/properties/158739815#/?channel=COM_BUY

³ Part Lane, Swallowfield: https://www.rightmove.co.uk/properties/161864522#/?channel=COM_BUY

⁴ Beech Hill Estate – Lot 3: https://www.rightmove.co.uk/properties/162748499#/?media?id=media1&channel=COM_BUY; Lot 4: https://www.rightmove.co.uk/properties/162748535#/?channel=COM_BUY; Lot 5: https://www.rightmove.co.uk/properties/162748583#/?channel=COM_BUY; Lot 6: https://www.rightmove.co.uk/properties/162744878#/?channel=COM_BUY

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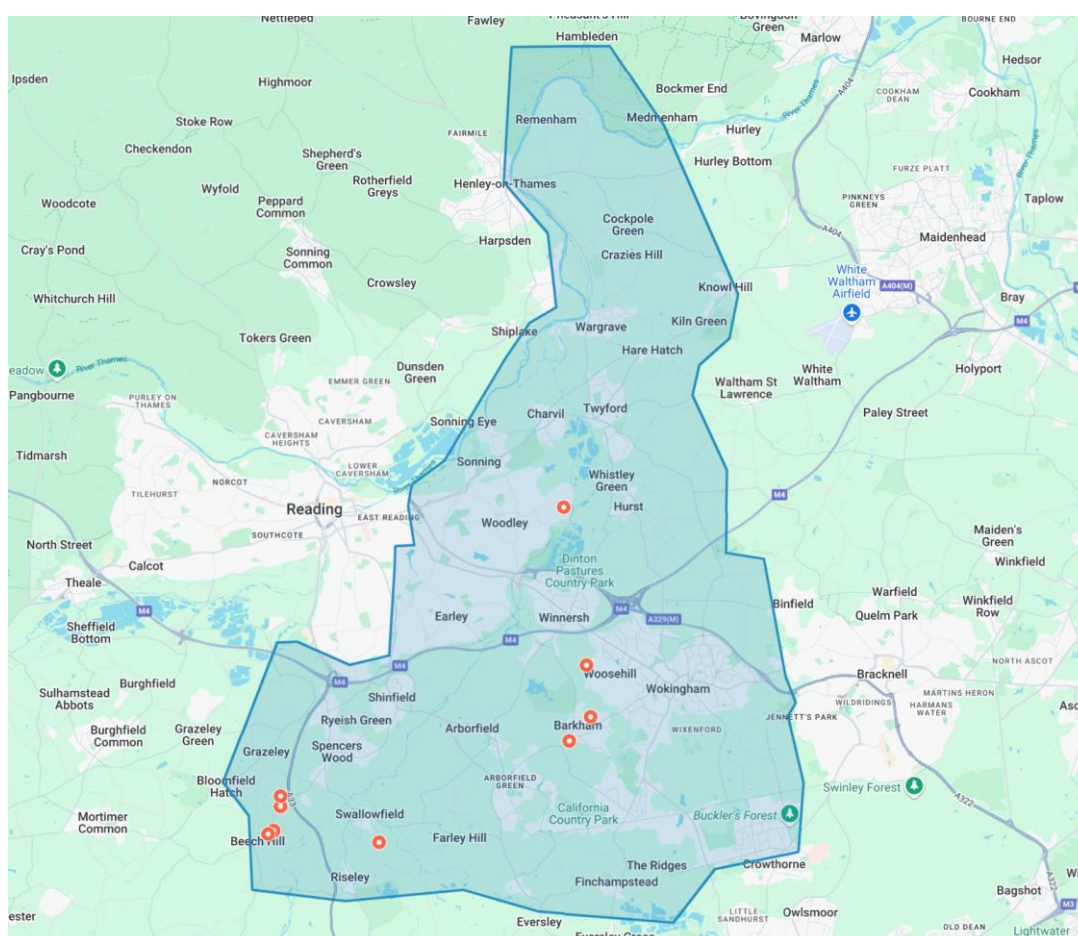


some potential for development, however, again, this is still in a countryside location and would not be large enough to facilitate the proposed development.

4.15. Even if a disaggregated approach was taken to one or more of these lots, the encroachment into the countryside would be a far larger impact than is present at the proposed development site.

4.16. As such, none of the Rightmove sites were sequentially preferable to the proposed development site.

Figure 4.6: Sites identified via Rightmove



4.17. Further to the Rightmove sift, and as confirmed in the *R (Mead and Redrow) v SoS LUHC [2024] 279 (Admin)* judgement that reasonable small sites within close proximity of one another may be included if there is a relationship between these sites, a further sift was carried out. This sift excluded sites which were unconnected from one another.

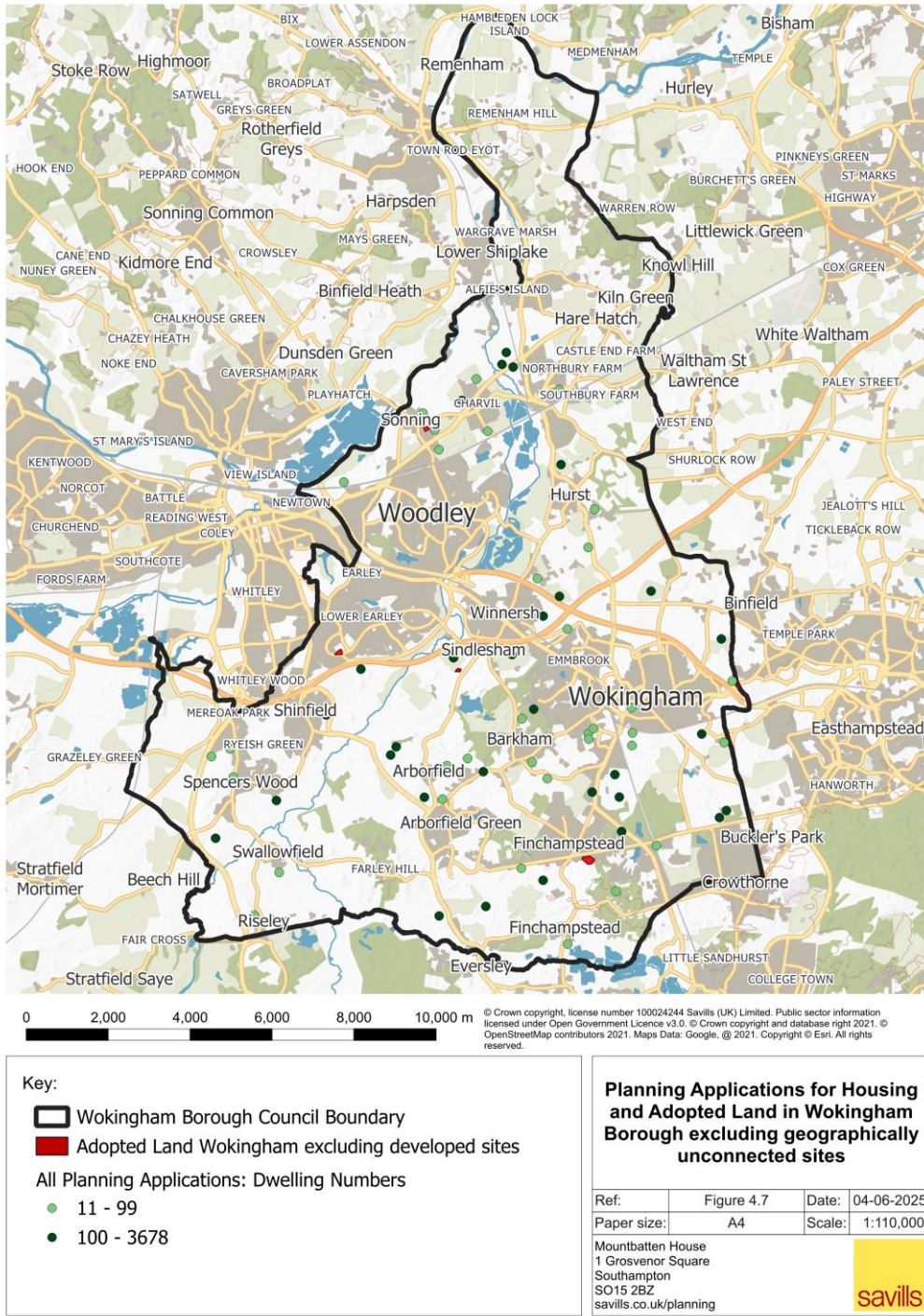
4.18. Out of the 130 sites identified through the third sift, 62 were excluded leaving 68 remaining (see Appendix 6 and Figure 4.7). As a result, this sift excluded all sites of 20 units and below.

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Figure 4.7: All Planning Applications and Adopted Land excluding geographically unconnected sites – 68 sites



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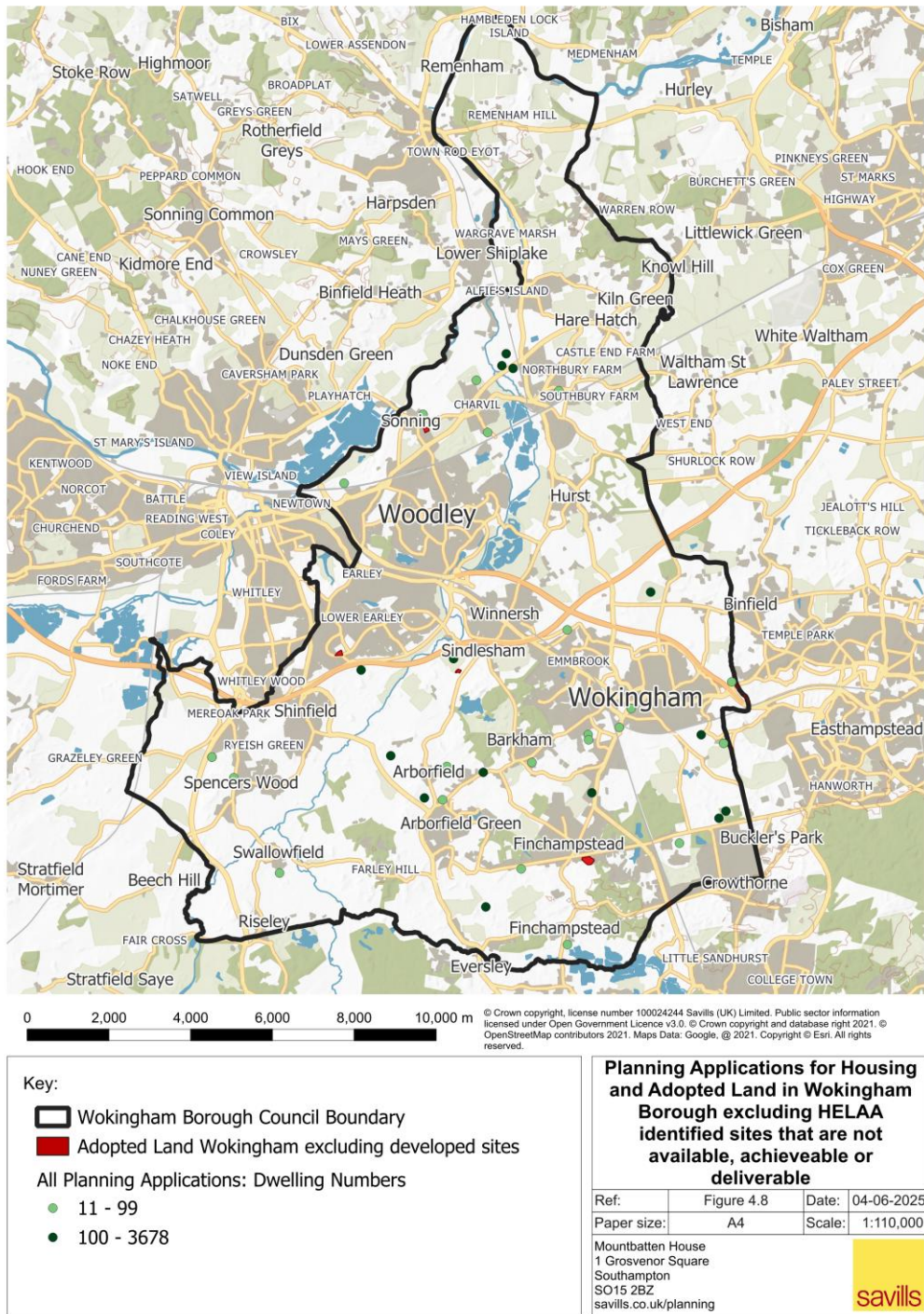
- 4.19. Further to the fourth sift, all remaining sites that have been identified in the Council's HELAA as not available, achievable or deliverable have been excluded as these sites are not sequentially preferable to the proposed development site.
- 4.20. Out of the 68 sites identified through the fourth sift, a further 31 were excluded leaving 37 remaining (see Appendix 7 and Figure 4.8).

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Figure 4.8: All sites and Adopted Land excluding those sites identified in the HELAA as not Available, Achievable or Deliverable – 37 sites

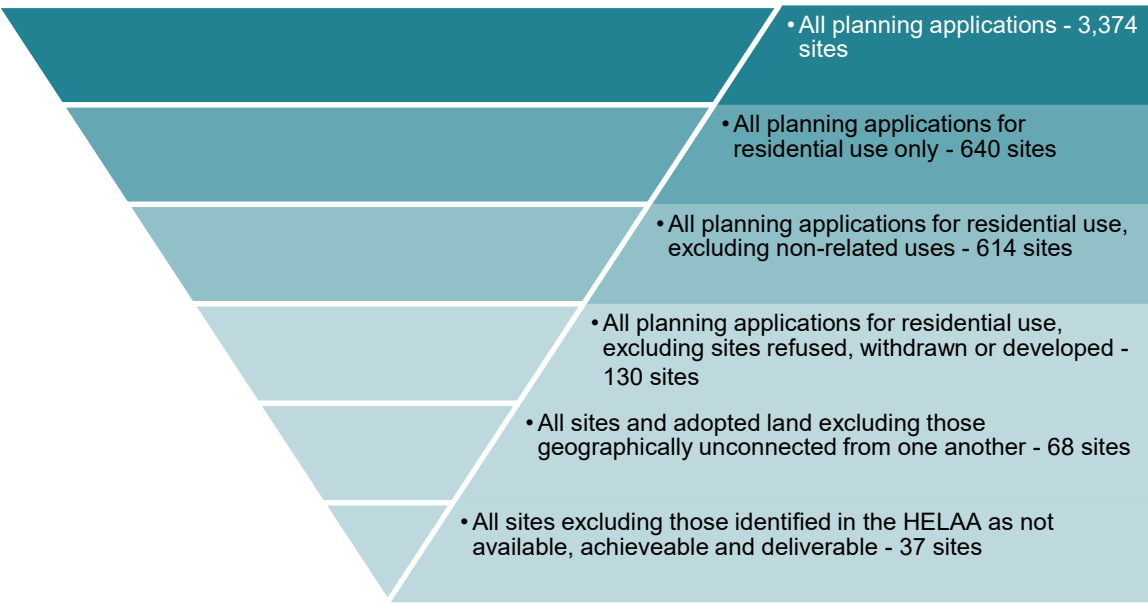




The Sifting Process

4.21. As evidenced above, this sifting process has identified only 37 sites that would be classed as available under the definitions within the NPPF (see Figure 4.9 below).

Figure 4.9: Site sifting hierarchy with figures



Availability

4.22. In accordance with the National Planning Policy Framework (NPPF) (2024), it must be demonstrated that there are no reasonably available sites for the proposed development in areas with a lower probability of flooding.

Flood Risk

- 4.23. The site at Old Forest Road is located within Flood Zone 1 (lowest risk of flooding) and has some areas to the centre of the site at highest risk of surface water flooding (1 in 30).
- 4.24. Of the 37 sites identified, 34 were identified as being within Flood Zones 2 or 3 or within areas at high risk from surface water flooding. Therefore, as this was not sequentially preferable to the application site, these sites were discounted from the search. Sites within Flood Zone 1 and within areas at medium (1 in 100) to low risk from surface water flooding (1 in 1,000) have been included. This was undertaken by cross referencing the sites against the EA Flood Risk Mapping (see Figure 4.10). This is illustrated within Figure 4.11 and found in Appendix 8.
- 4.25. This reduced the available sites in the Glenigan dataset down to three, and the number of adopted sites to four for a total of seven potential sites.

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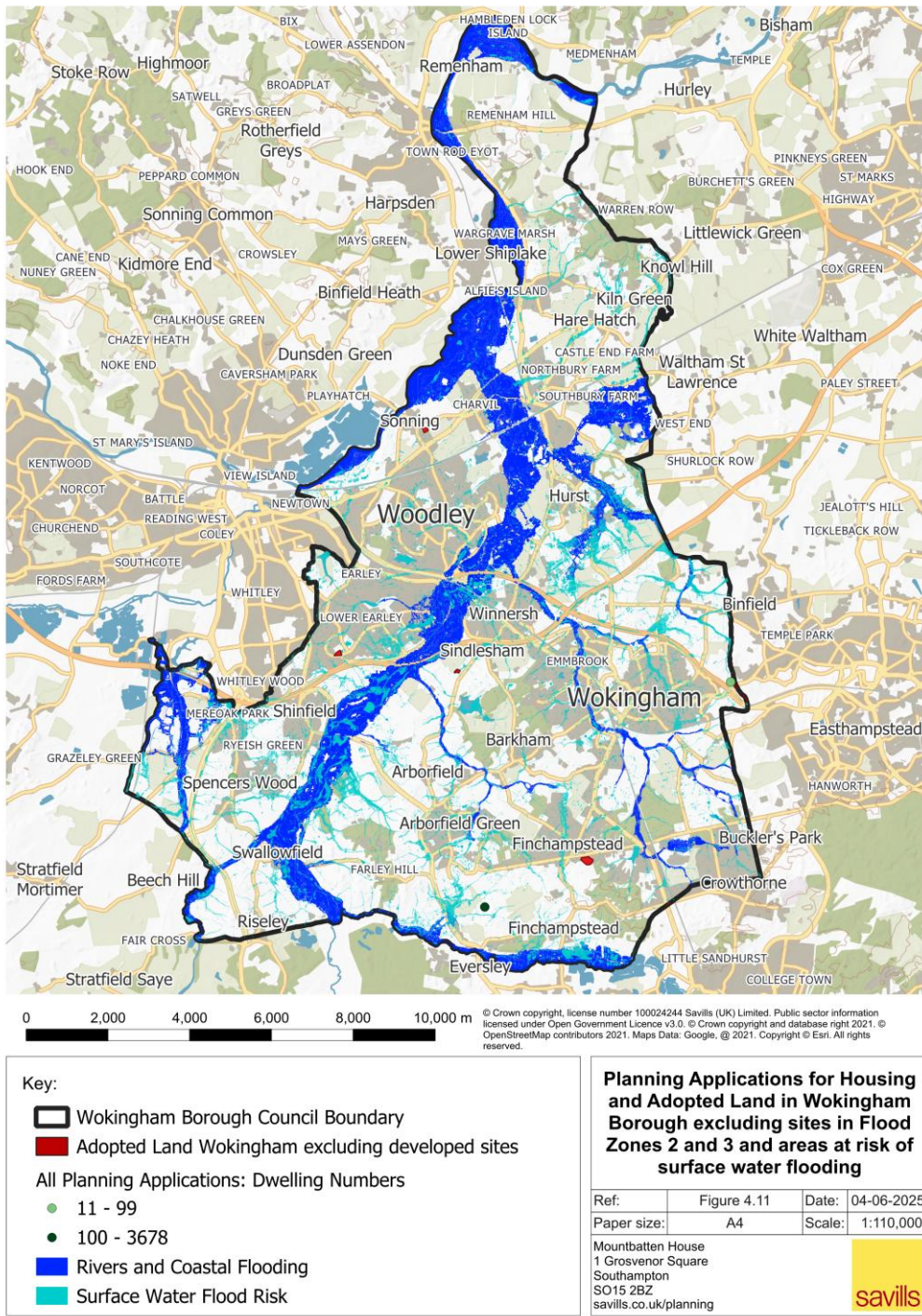


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Figure 4.11: Final refined list of sites, excluding those in Flood Zone 2 or 3



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Sequential Test Remaining Sites

- 4.26. In total, 3,374 planning applications/ sites in the HELAA and nine Right Move sites were found within the agreed geographical location and assessed as part of the Sequential Test Search.
- 4.27. As a result, 3,371 applications/ sites in the HELAA and nine Right Move sites have been discounted. These have included:
- Applications not in relation to residential use: 2,734
 - Applications excluding non-related residential uses: 26
 - Applications refused, withdrawn or developed: 484
 - Sites that are geographically unconnected: 62
 - Sites that are identified in the HELAA as not available, achievable and deliverable: 31
 - Sites identified via Right Move: nine
 - Adopted sites included within the Sequential Test: four
 - Sites not located in Flood Zone 2 or 3: three
 - **Total Sites to be included in Sequential Test: seven**
- 4.28. The potential for the seven remaining sites to provide a suitable alternative to the proposed development site will be assessed within the next section of this Report.

5. Sequential Test Site Analysis

- 5.1. In order to consider if any of the remaining sites could be considered as reasonably available alternatives to the proposed development in accordance with the requirements and definitions of the Planning Practice Guidance (PPG), it is important to look at the potential of these sites to deliver the proposed development and their availability. These are set out below:

Sites identified via the Glenigan dataset

- Stanbury House, Basingstoke Road, Reading, Berkshire, RG7 1AJ
- Park Farm, Park Lane, Finchampstead, Wokingham, Berkshire, RG40 4QF
- Amen Corner, London Road, Wokingham, Berkshire, RG40

Adopted Sites

- Wick Hill Lane, Finchampstead
- Little Glebe, Sonning, Wokingham
- Rushey Way, Lower Earley, Earley, Shinfield
- Land off Wheatsheaf Close

- 5.2. Sites were discounted as they could not be considered “*reasonably available*”, nor could they be considered a “*reasonable alternative*” for the Proposed Development.

- 5.3. The PPG states that to be “*reasonably available*” a site:

- a) must be in a suitable location for the type of development; and
- b) must have a reasonable prospect of being available to be developed at the point in time envisaged for the development; and
- c) does not need to be owned by the applicant to be considered “*reasonably available*”.

- 5.4. The NPPF (paragraph 174) makes clear that, when considering reasonably available sites, you are considering whether the site is appropriate for the proposed development and not for any development. Accordingly, when the PPG states that a site must have a “*reasonable prospect of being available to be developed*”, it must mean that the site must also have a “*reasonable prospect of being available to be developed*” into the proposed development itself.

Land West of Stanbury House, Basingstoke Road, Reading, Berkshire, RG7 1AJ

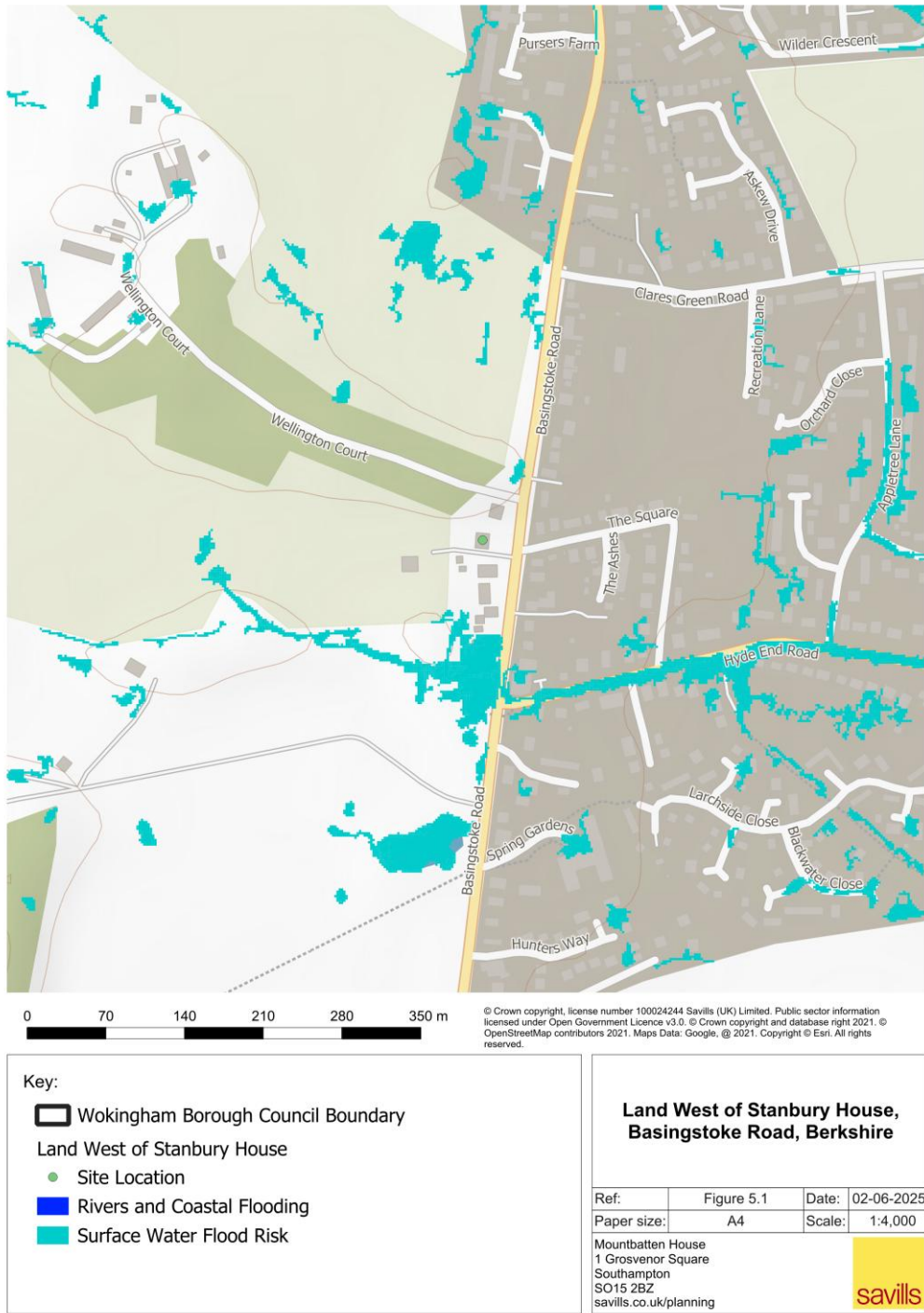
- 5.5. Stanbury House is located to the west of Wokingham Borough to the west of Basingstoke Road. A neighbouring site, Land at Stanbury House, received Reserved Matters planning consent for 57 dwellings (ref. 212914) and is under construction/ nearing completion and is not to be confused with this site Land West of Stanbury House.

Flood Risk Sequential Test

Old Forest Road, Wokingham



Figure 5.1: Land West of Stanbury House with Flood Zone Mapping



Flood Risk Sequential Test

Old Forest Road, Wokingham

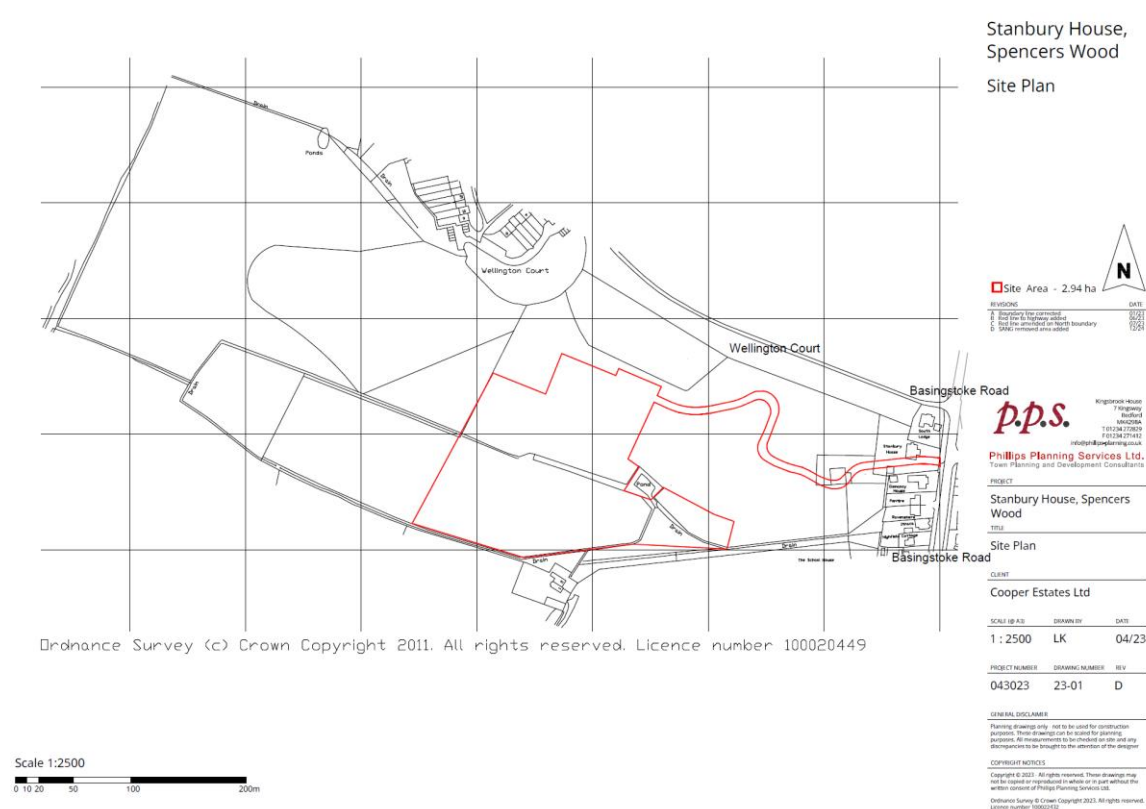


- 5.6. Land West of Stanbury House was found to have a request for a screening opinion (ref. 243226) submitted for the following:

“Screening Opinion application for an Environmental Impact Assessment for the proposed development of up to 63 dwellings with associated access and landscaping.”

- 5.7. The Location Plan submitted with the screening opinion is shown in Figure 5.1.

Figure 5.2: Location Plan - Land West of Stanbury House⁵



- 5.8. The site has areas of surface water flooding within and to the south of the pond to the centre of the site.
- 5.9. The site is Outside Development Locations (Policy CP5), located in the ‘Countryside’ (Policy CP11) and is located within the ‘Stanbury Park SANG’ (Policy SAL05) in the adopted Local Plan. The site is located within the ‘Modest Settlement’ boundary and a Valued Landscape Area within the emerging Local Plan. The site is not allocated with the adopted or emerging Wokingham Local Plan.
- 5.10. As the site is neither allocated in the adopted or emerging local plan, in contrast with the proposed development site, is in the countryside and has a similar low level of surface water flooding, it is not

⁵ Source: Philipps Planning Services Ltd. - Application Ref.: 243226

Flood Risk Sequential Test

Old Forest Road, Wokingham

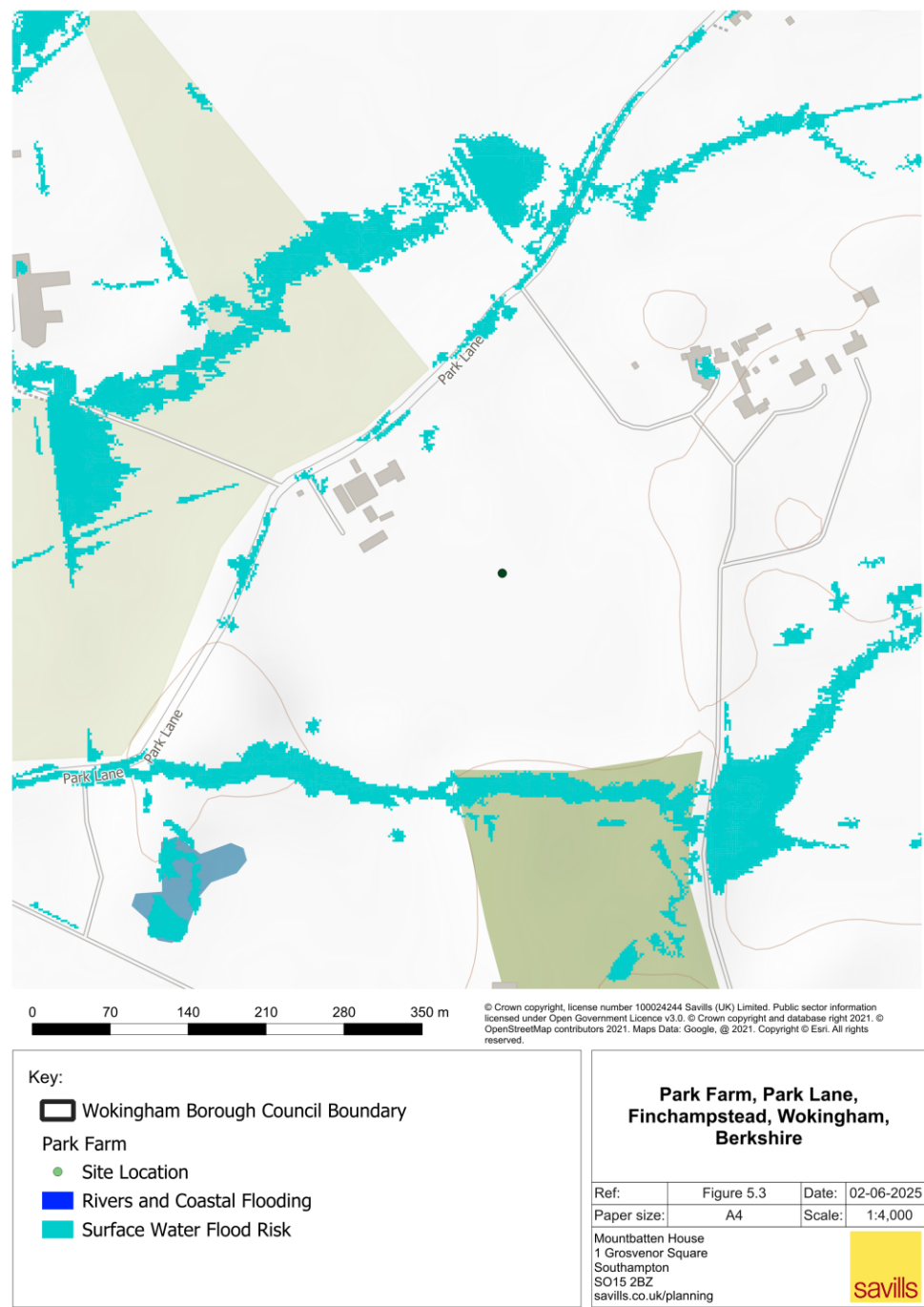


considered to be sequentially preferable. Therefore, Land West of Stanbury House can be discounted from the Sequential Test.

Park Farm, Park Lane, Finchampstead, Wokingham, Berkshire, RG40 4QF

5.11. Park Farm, Park Lane is located to the south of Wokingham Borough.

Figure 5.3: Park Farm, Park Lane with Flood Zone Mapping



5.12. The site does not have any relevant planning history but it was submitted as a site under the Council’s HELAA for 192 dwellings (ref. HFI048). This site was excluded at the Stage 2A Initial Suitability Sift due to being too far detached from the Settlement Boundary. Although the pattern of development from Arborfield

Flood Risk Sequential Test

Old Forest Road, Wokingham



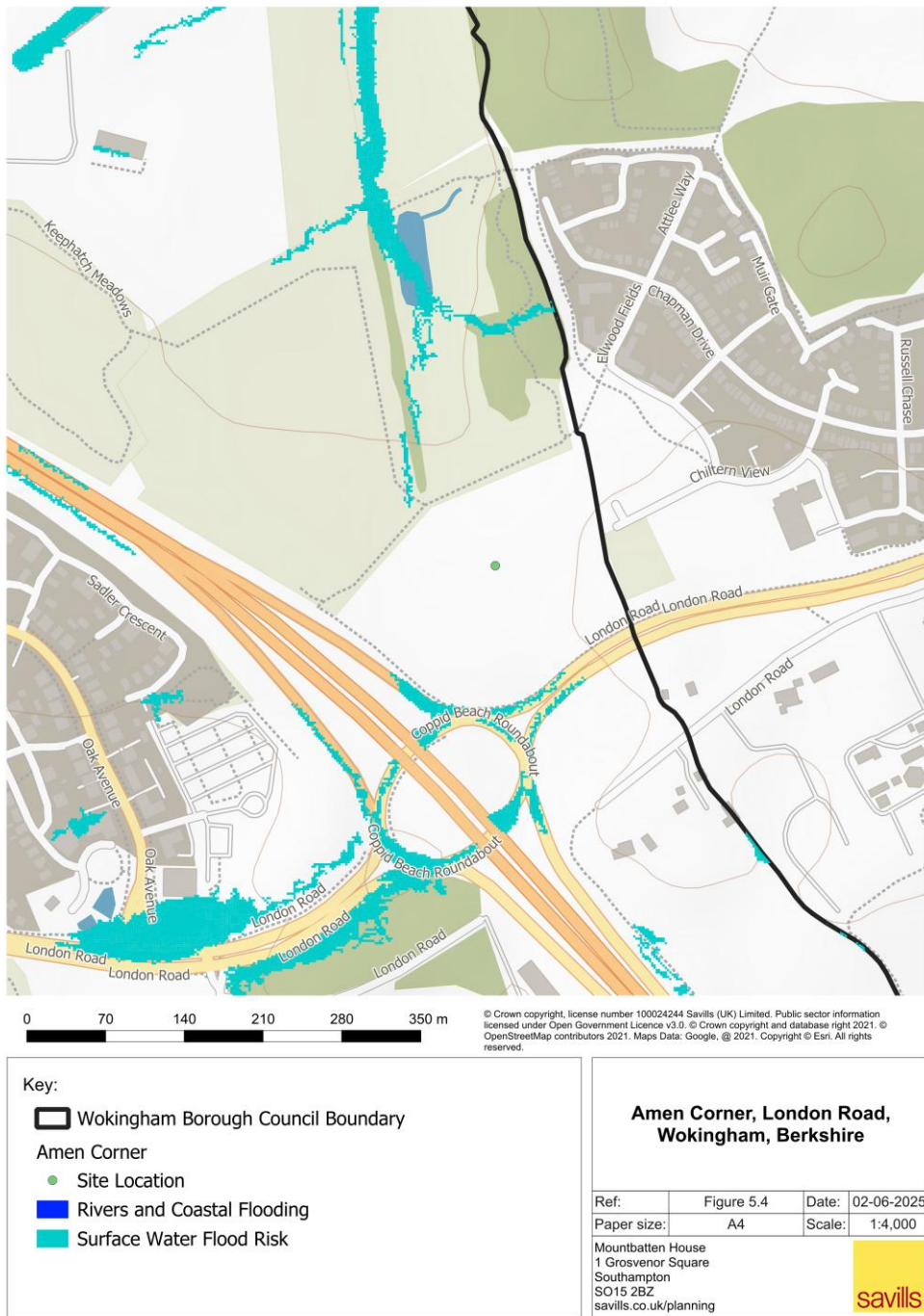
Garrison is proceeding south, this site would not be considered immediately available and therefore would fail the tests set out within the NPPF.

- 5.13. In contrast, the proposed development site is on the fringes of, but connected to, the settlement boundary of Wokingham Parish.

Amen Corner, London Road, Wokingham, Berkshire, RG40

- 5.14. The site at Amen Corner is to the east of Wokingham Borough. There are a number of recent consents in neighbouring boroughs (outside of the agreed search parameters).

Figure 5.4: Amen Corner, London Road with Flood Zone Mapping



5.15. Land at Amen Corner has a live hybrid planning application (ref. 232026) comprising the following:

“Hybrid planning application (part outline/part detailed) comprising an outline application for the erection of up to 45 residential dwellings, landscaping and associated infrastructure (means of access to be

Flood Risk Sequential Test

Old Forest Road, Wokingham



considered, with appearance, landscaping, layout and scale to be reserved) and a full application for the proposed Suitable Alternative Natural Greenspace (SANG). (Revised description)”

5.16. This application is currently under consideration and is awaiting approval.

5.17. The latest proposed site layout plan is shown in Figure 5.5.

Figure 5.5: Land Adjacent to Amen Corner, North of London Road/East 329M Site Layout⁶



5.18. The site is free from areas of surface water flooding.

5.19. The site is allocated in the Emerging Local Plan (Policy SS14) and is within a proposed Valued Landscape Area (Policy NE6). As the site is within a proposed Valued Landscape Area, whereas the proposed development site is not, the site would not be considered sequentially preferable to the proposed development site.

⁶ Source: Urban Place Lab - Application Ref.: 232026

Flood Risk Sequential Test

Old Forest Road, Wokingham



- 5.20. As indicated through recent appeal decisions⁷, for a site to be “*reasonably available*”, there does need to be a reasonable prospect of it being available to be developed into the Proposed Development. In other words, it must be available for purchase by the Applicant to be developed into the Proposed Development or there must be a reasonable prospect that the current owner of the land will develop the land on the same terms as the Proposed Development. Therefore, the Opinion concludes that if a site was owned by a private person/ body who was unwilling to sell the site to the Applicant and unwilling to develop the site on the same terms as the Proposed Development then it could not be considered “*reasonably available*”.
- 5.21. As the owners of this site are progressing with an outline application, it is unlikely that the landowners would be willing to sell the site at this stage. As such, Land at Amen Corner is not considered to be sequentially preferable to the proposed development site.

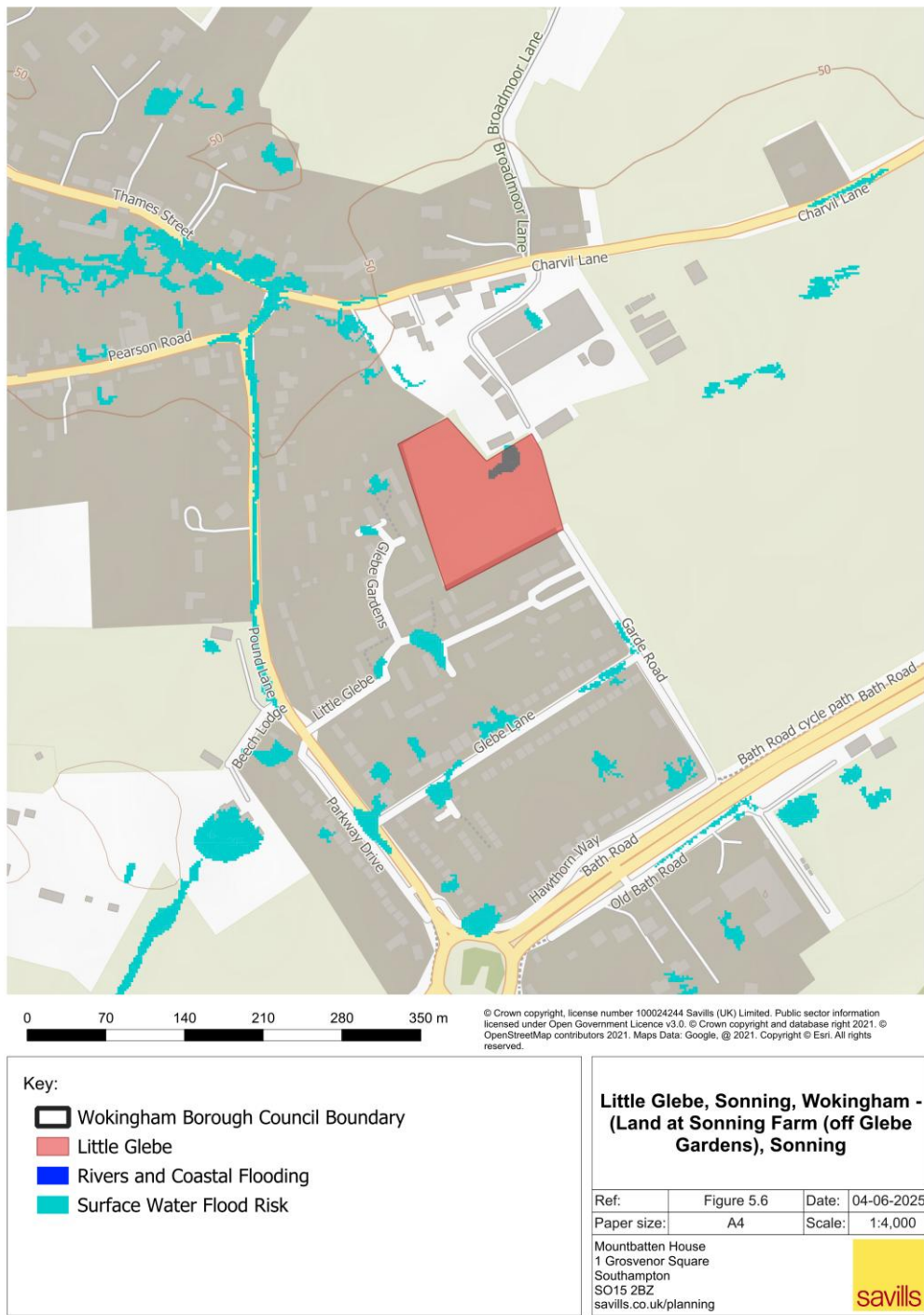
Allocated Sites

Little Glebe, Sonning, Wokingham – Land at Sonning Farm (off Glebe Gardens), Sonning

- 5.22. Little Glebe, Sonning is an allocated reserve site for approximately 25 dwellings within the Wokingham Borough Adopted Local Plan, situated to the northwest of the Borough. Within the Managing Development Delivery DPD (2014), reserve sites were earmarked to release additional land in situations where the five-year housing land supply has dropped below the necessary levels (WBC has a 1.7 years supply). This absence of a five-year supply, since at least 2021, implies that the site has not come forward due to other factors thereby, failing the availability test. The site is also carried forward under the emerging Local Plan under Policy SS14.17.

⁷ Appeal Ref: APP/V1260/W/24/3351431 – Former Southern Gas Network Site, Bridge Street, Christchurch, Dorset, BH23 1AZ and Appeal Ref: APP/Z3635/W/24/3342657 – Land East of Vicarage Road, Sunbury-on-Thames, TW16 7LB

Figure 5.6: Little Glebe, Sonning with Flood Zone Mapping



5.23. The site does not contain any areas of 1 in 30 surface water flooding but contains areas of 1 in 100 and 1 in 1,000 surface water flooding to the north of the site.

Flood Risk Sequential Test

Old Forest Road, Wokingham

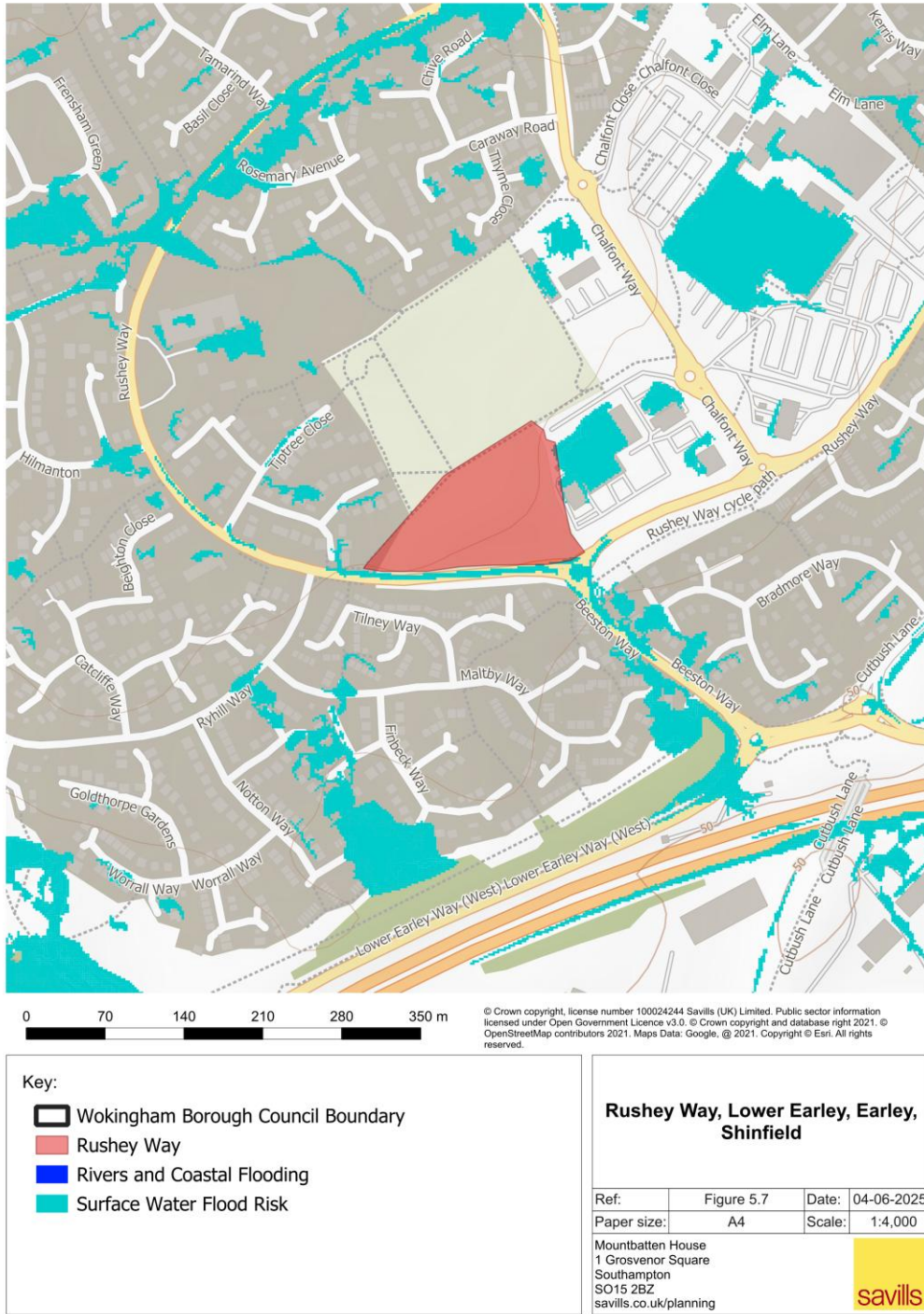


- 5.24. As there are not any live planning applications on site, the chance of the site being available, achievable or deliverable in the next five years is unlikely. It would be safe to assume that an outline planning application could be submitted, however, as the statutory determination period is 13 weeks, due to the significant pressure local authorities are under, this is likely to take much longer in reality, potentially 12-18 months after submission (June 2025 – December 2026).
- 5.25. Further to this, a Reserved Matters application would be required. This could take another 12-18 months to be approved (December 2026 – April 2028). Additionally, the site is unable to be combined with a series of other nearby sites to form the quantum required for the proposed development.
- 5.26. As such, the site is not considered to be available or deliverable and should therefore, be excluded from the sequential test.

Rushey Way, Lower Earley, Earley, Shinfield

- 5.27. Rushey Way is located to the west of the Borough in Lower Earley. The site is allocated for mixed use development including C3 uses within the Adopted Local Plan. This site has, however, been de-allocated in the emerging Local Plan and designated as 'Local Green Space'.

Figure 5.7: Rushey Way, Lower Earley with Flood Zone Mapping



5.28. The site was not promoted as part of the latest HELAA or emerging Local Plan. The site therefore, has not been included as an allocation in the emerging Local Plan.

Flood Risk Sequential Test

Old Forest Road, Wokingham

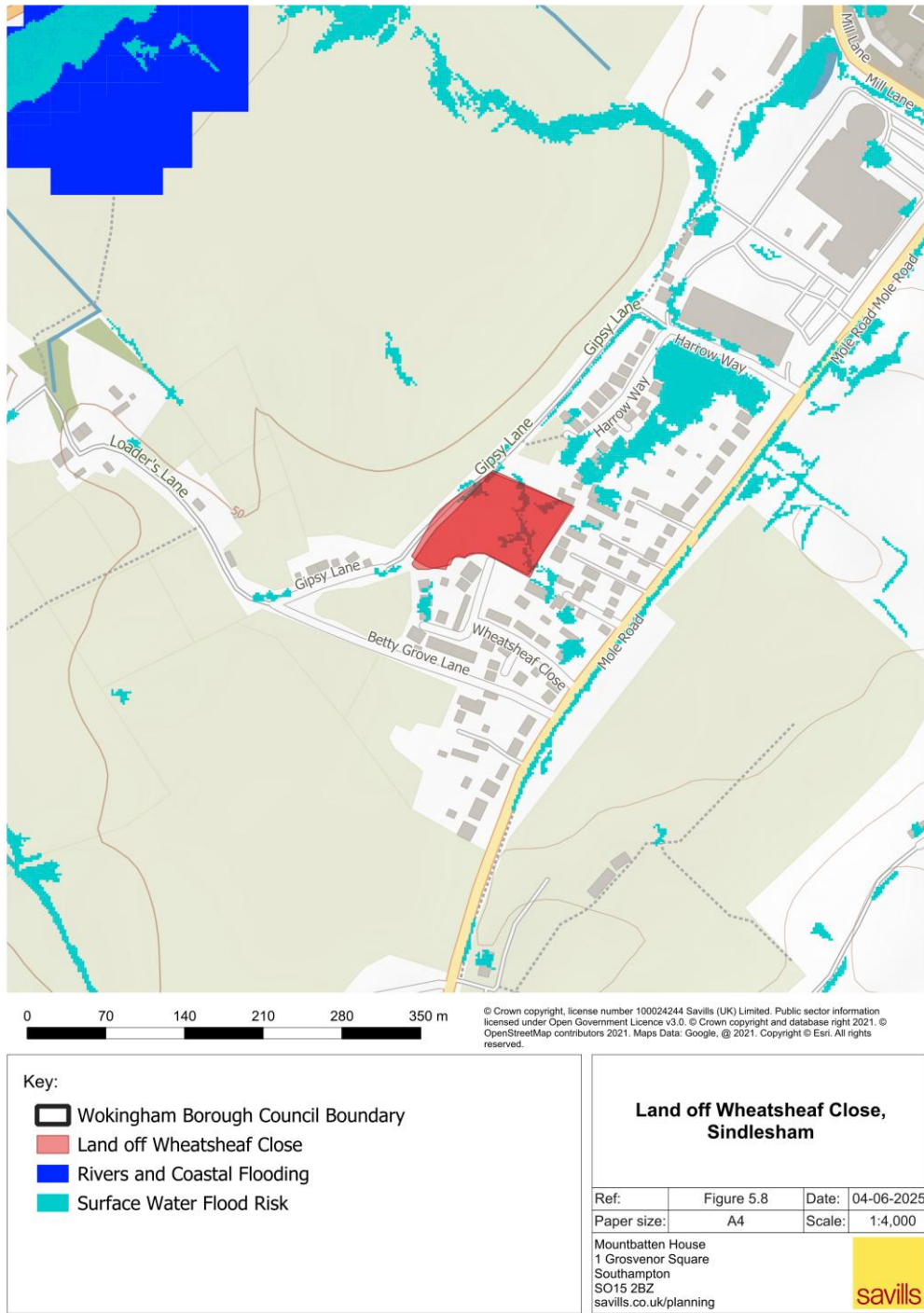


- 5.29. As the site is due to be de-allocated, the site can no longer be considered available for residential development and should therefore, be excluded as an alternative.

Land off Wheatsheaf Close

- 5.30. Land off Wheatsheaf Close is an allocated reserve site for approximately 24 dwellings within the Wokingham Borough Adopted Local Plan, located to the centre of the Borough. Within the Managing Development Delivery DPD (2014), reserve sites were earmarked to release additional land in situations where the five-year housing land supply has dropped below the necessary levels (WBC has a 1.7 years supply). This absence of a five-year supply, since at least 2021, implies that the site has not come forward due to other factors, thereby failing the availability test. The site is also carried forward under the emerging Local Plan under Policy SS14.15.

Figure 5.8: Land off Wheatsheaf Close with Flood Zone Mapping



5.31. As there are not any live planning applications on site, the chance of the site being available, achievable or deliverable in the next five years is unlikely. It would be safe to assume that an outline planning application could be submitted, however, as the statutory determination period is 13 weeks, due to the significant

Flood Risk Sequential Test

Old Forest Road, Wokingham



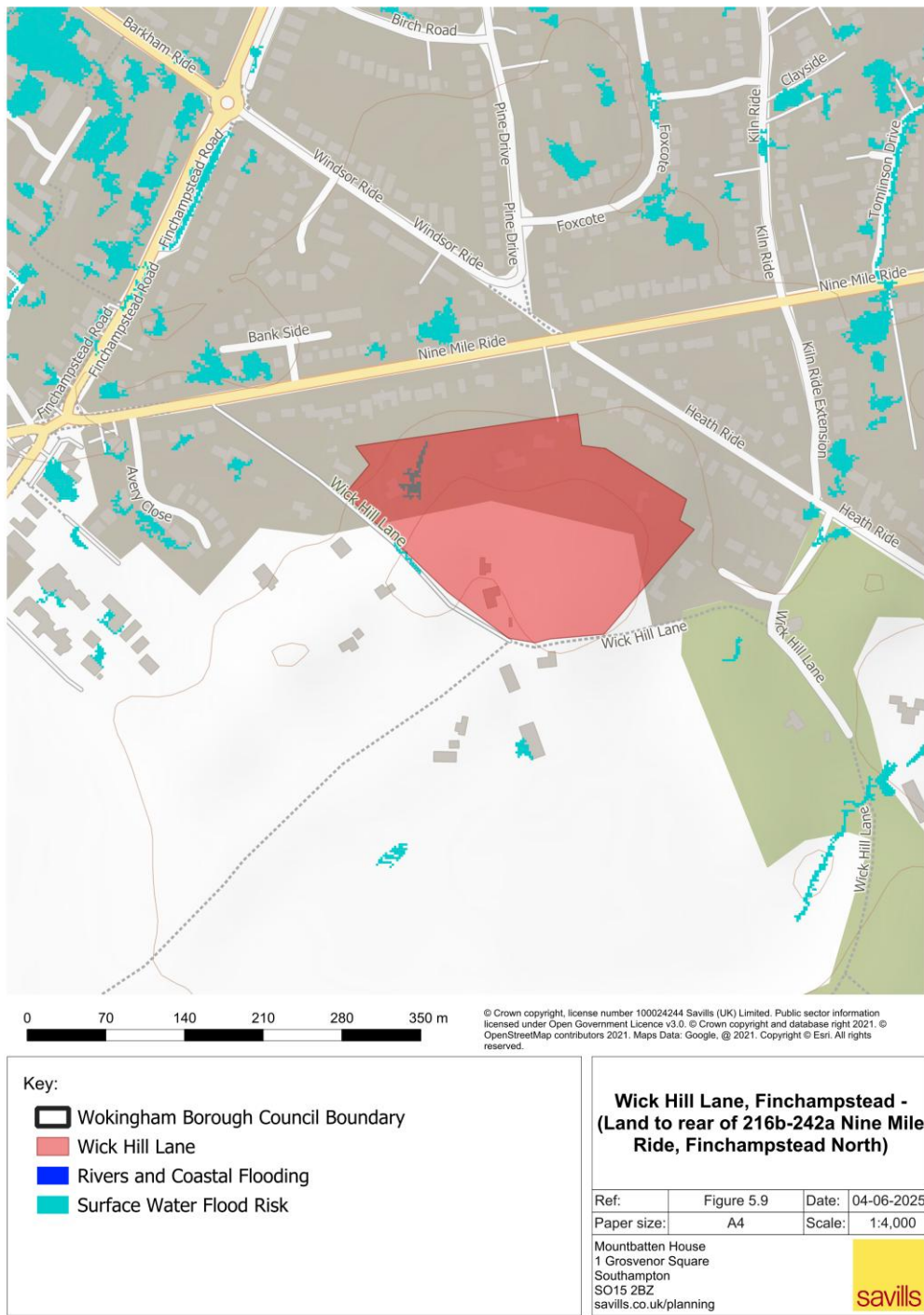
pressure local authorities are under, this is likely to take much longer in reality, potentially 12-18 months after submission (June 2025 – December 2026).

- 5.32. Further to this, a Reserved Matters application would be required. This could take another 12-18 months to be approved (December 2026 – April 2028). Additionally, the site is unable to be combined with a series of other nearby sites to form the quantum required for the proposed development.
- 5.33. As such, the site is not considered to be available or deliverable and should therefore, be excluded from the sequential test.

Wick Hill Lane, Finchampstead – Land to rear of 216b-242a Nine Mile Ride, Finchampstead North

- 5.34. Wick Hill Lane, Finchampstead is allocated for around 40 dwellings in the Adopted Local Plan as a reserve site which restricts completions until after 1 April 2026. The site was not carried forward in the emerging Local Plan.

Figure 5.9: Wick Hill Lane, Finchampstead with Flood Zone Mapping



5.35. The site was not promoted as part of the latest HELAA or emerging Local Plan. The site therefore, has not been included as an allocation in the emerging Local Plan.

Flood Risk Sequential Test

Old Forest Road, Wokingham



- 5.36. As the site is due to be de-allocated, the site can no longer be considered available for residential development and should therefore, be excluded as an alternative.

Summary

- 5.37. As set out within this Sequential Test Report, no other sites have been identified as suitable, available, deliverable alternatives for the proposed development.
- 5.38. None of the sites are available to deliver the Proposed Development as a whole, and whilst some sites could be developed in conjunction with one another, not only would this be on already adopted sites but on two or more sites that are geographically unconnected from one another.
- 5.39. Land West of Stanbury House is not allocated for development and has either the same flood constraints or worse than the proposed development site, as such this is not considered to be sequentially preferable to the proposed development site.
- 5.40. Park Farm, Park Lane for 192 dwellings has been excluded from the Council's HELAA at the second stage due to its distance from any defined settlement. As such, this is not considered to be sequentially preferable to the proposed development site.
- 5.41. Land at Amen Corner has a current live outline application for 45 dwellings and is allocated in the emerging Local Plan. This site could be available, however, the site is within a proposed Valued Landscape Area whereas the proposed development site is not, and as such the site would not be considered sequentially preferable to the proposed development site. In addition, the owners of the site are progressing with an outline planning application, similar to the proposed development site and therefore it is unlikely that they would be willing to sell the site at this stage. Therefore, Land at Amen Corner is not considered to be sequentially preferable.
- 5.42. In terms of allocated sites, both Little Glebe and Land off Wheatsheaf Close have been allocated for quite some time and are yet to be developed. This is likely due to the time restriction on reserve sites in the adopted Local Plan. The emerging Local Plan releases these site as an allocation for development however, the emerging Local Plan is yet to be adopted and this process would take a significant amount of time if this has not already started and therefore it is considered unlikely that the site could be considered available or deliverable and. Therefore, the site should be excluded from the sequential test.
- 5.43. Similarly, Rushey Way and Wick Hill Lane were previously allocated in the adopted Local Plan but have been de-allocated in the emerging Local Plan. As such, these sites can be excluded from the sequential test.
- 5.44. In conclusion therefore, the proposed development is considered to pass the Sequential Test.

6. Conclusion

- 6.1. This Sequential Test has been prepared in support of an application for 53 dwellings and associated works on Land to the North of Old Forest Road, Wokingham.
- 6.2. The site is located within the administrative area of Wokingham Borough Council, and it currently forms a greenfield site.
- 6.3. The description of development for the application is:
- “Erection of 53no. dwellings with associated landscaping, parking, drainage, open space and other associated works”*
- 6.4. According to the Environment Agency’s online map for flooding the site is located within Flood Zone 1 with areas of high risk of surface water flooding to the centre of the site and therefore, conformity with the Sequential Test is required.
- 6.5. In May 2025, correspondence from WBC officers confirmed a number of search parameters which should be used. It was agreed that the whole of Wokingham Borough should be used for the search.
- 6.6. The Council’s list of five-year housing land supply sites and the Brownfield Land Register Part 1 list were used to establish if there were any suitable alternative sites for the Proposed Development which were reasonably available in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).
- 6.7. The Geographical Information System known as QGIS was then utilised to identify potential sites within the geographical boundary. The Glenigan Database used to identify all planning applications and sites that had been submitted for consideration in the HELAA within the Wokingham Borough boundary since circa 2000, as well as current adopted land. This resulted in 3,374 applications/sites being identified.
- 6.8. Of the total 3,374 sites, 3,371 were discounted from the search for the following reasons:
- Applications not in relation to residential use
 - Applications excluding non-related residential uses
 - Applications refused, withdrawn or developed
 - Sites and adopted land excluding those geographically unconnected from on another
 - Sites excluding those identified in the HELAA as not available, achievable and deliverable
 - Sites identified via Right Move
 - Sites in Flood Zone 2 or 3
- 6.9. In order to ensure that no other sites in WBC may be available, searches were undertaken through Rightmove. The *R (Mead and Redrow) v SoS LUHC [2024] 279 (Admin)* judgement confirmed that reasonable available sites may include a series of smaller sites, but the ‘series’ is important and it connotes that there should be relationships between the smaller sites proposed.

Flood Risk Sequential Test

Old Forest Road, Wokingham



- 6.10. We have excluded looking at **all** available plots of land, which included individual houses for sale. Due to the evolved caselaw, it is presented that the lack of relationships between many small sites with capacity for only one or two additional dwellings would not be sequentially preferable. Hence, only nine sites were found to be for sale within the geographical boundaries of the site (see Appendix 5 and Figure 4.6).
- 6.11. Sites that were found to be for proposals which would result in a net increase in dwellings but were remote from one another were discounted from the search, as they would not provide a net increase in dwellings which could be considered available or suitable alternatives.
- 6.12. In total, the Sequential Test identified three sites and four allocations which had the potential to accommodate the proposed development.
- 6.13. The report then provided an analysis of these sites to consider if any could be considered reasonably available alternatives for the Proposed Development.
- 6.14. The objective of the development is to provide for 53 dwellings of a mixed range, tenure and size with both market and affordable units sharing the same areas and public open spaces.
- 6.15. Of the 7 sites remaining within the Sequential Test, Land West of Stanbury House and Park Farm, Park Lane would have been able to accommodate the development however, the former was not allocated and had areas of flood risk through the site whereas the latter was excluded via the HELAA due to its distance from the settlement boundary. For this reason, the Sequential Test is considered to be passed.
- 6.16. However, even if a disaggregate approach was taken, the Report demonstrates that the Sequential Test would still be passed.
- 6.17. As indicated through recent appeal decisions⁸, for a site to be “*reasonably available*” there does need to be a reasonable prospect of it being available to be developed into the Proposed Development. In other words, it must be available for purchase by the Applicant to be developed into the Proposed Development or there must be a reasonable prospect that the current owner of the land will develop the land on the same terms as the Proposed Development. Therefore, the Opinion concludes that if a site was owned by a private person/body who was unwilling to sell the site to the Applicant and unwilling to develop the site on the same terms as the Proposed Development then it could not be considered “*reasonably available*”.
- 6.18. This Report demonstrates that, of the seven sites remaining within the Sequential Test, Little Glebe and Land off Wheatsheaf Close would not be available for delivery under the current Local Plan and it would take some time to prepare and submit outline and reserved matters applications. Land at Amen Corner is yet to be approved with the owner unlikely to sell if they are already progressing with a planning application. The other two sites, Rushey Way and Wick Hill Lane were excluded due to significant on-site constraints and de-allocation.

⁸Appeal Ref: APP/V1260/W/24/3351431 – Former Southern Gas Network Site, Bridge Street, Christchurch, Dorset, BH23 1AZ and Appeal Ref: APP/Z3635/W/24/3342657 – Land East of Vicarage Road, Sunbury-on-Thames, TW16 7LB

Flood Risk Sequential Test

Old Forest Road, Wokingham



- 6.19. Therefore, overall, none of the seven remaining sites were found to be “*suitably available*” as alternatives for the proposed development of 53 dwellings, and the Sequential Test is considered to be passed.

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendices

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 1

All 3,374 sites spreadsheet

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 2

All 640 sites excluding non-housing applications spreadsheet

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 3

All 614 sites excluding non-related uses spreadsheet

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 4

All 130 sites excluding sites refused, withdrawn or developed spreadsheet

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 5

Rightmove listings for 9 sites in Wokingham Borough

Flood Risk Sequential Test

Old Forest Road, Wokingham



1 – Perimeter Road, Reading: https://www.rightmove.co.uk/properties/160283558#/?channel=COM_BUY

Perimeter Road, Reading, RG5

Guide Price: **£40,000**

PROPERTY TYPE: **Land**

NOF: **Ask agent**

Key features:

- Lots A & B Available
- £40,000 Each
- Approx 0.25 Acres each
- Freehold

Description: Land Adjacent to Perimeter Close, Woodley, Reading, Berkshire, RG5 4US.

2 – Simons Wood, Wokingham: https://www.rightmove.co.uk/properties/162664052#/?channel=COM_BUY

Simons Wood, Wokingham, RG41

Guide Price: **£20,000**

PROPERTY TYPE: **Land**

NOF: **Ask agent**

Key features:

- Approx. 0.4 acres of established mixed woodland
- Private and peaceful setting in a prestigious residential area
- Access via a quiet, tree-lined lane
- Rich in biodiversity - perfect for nature conservation or leisure
- Easy reach of Wokingham town centre
- Excellent access to the A329(M), M4 and local rail

Flood Risk Sequential Test

Old Forest Road, Wokingham



3 – Land at Sandy Lane, Wokingham:

https://www.rightmove.co.uk/properties/160339814#/?channel=COM_BUY

rightmove

Buy Rent House Prices Find Agent Commercial Inspire Overseas My Rightmove

See similar properties

Land at Sandy Lane, Wokingham, Berkshire, RG41 4DB

Guide Price
£25,000

PROPERTY TYPE
☒ Land

SIZE
☒ Ask agent

No floor/plot plan

Description
Guide Price: £25,000
For sale by unconditional online auction starting on 5th June at 10:00 and ending on 5th June at 12:00
For sale by online auction. This manageable parcel of woodland, offering a variety of potential uses, such as a
[Read full description](#)

Land at Sandy Lane, Wokingham, Berkshire, RG41 4DB

MARKETED BY
OLAPA, Barnsey
100 Wood Lane, Wokingham, Berkshire, RG41 4DB
Phone properties from this agent

Call agent
Request details

Clarity
From ideas to actions within one whiteboard

Screening tool
Screenshot copied to clipboard
Automatically saved to screenshots folder
Mark up and share

4 – Wokingham, Berkshire Site: https://www.rightmove.co.uk/properties/158739815#/?channel=COM_BUY

rightmove

Buy Rent House Prices Find Agent Commercial Inspire Overseas My Rightmove

See similar properties

We Value Our Clients.
Not Just Their Properties.

Wokingham, Berkshire

Guide Price
£160,000

PROPERTY TYPE
☒ Land

SIZE
☒ Ask agent

No floor/plot plan

Key features
• An interesting speculative purchase
• Between the settlements of Wokingham and Arborfield

Description

MARKETED BY
Martin & Pate, Wokingham
27 Broad Street, Wokingham, Berkshire, RG41 1AA
Phone properties from this agent

Call agent
Request details

We Value Our Clients.
Not Just Their Properties.

Screening tool
Screenshot copied to clipboard
Automatically saved to screenshots folder
Mark up and share

Flood Risk Sequential Test

Old Forest Road, Wokingham



5 – Part Lane, Swallowfield: https://www.rightmove.co.uk/properties/161864522#/?channel=COM_BUY

Part Lane, Swallowfield
Reading, RG7 1TB

Guide Price
£350,000

PROPERTY TYPE
Plot

ASK AGENT

Key features

- Approx 5.25 Acres with Pond
- Large half-acre pond
- Multiple use (subject to planning permissions).
- Close to Swallowfield village
- Excellent access to the A33
- By appointment only

Call agent
Request details

6a – Beech Hill Estate – Lot 3:

https://www.rightmove.co.uk/properties/162748499#/media?id=media1&channel=COM_BUY

Lot 3 - The Beech Hill Estate, Beech Hill, Reading, Berkshire

Guide Price
£400,000

PROPERTY TYPE
Land

ASK AGENT

Key features

- Woodland
- Description
- Lot 3 - Beech Hill Covenants
- About 41.62 acres

Call agent
Request details

Old Forest Road, Wokingham



6c – Lot 5: https://www.rightmove.co.uk/properties/162748583#/?channel=COM_BUY

rightmove

Buy Rent House Prices Find Agent Commercial Inspire Overview **My Rightmove**

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Lot 3 - The Beech Hill Estate, Beech Hill, Reading, Berkshire

Guide Price
£70,000

PRIORITY TYPE: Land

SIZE: 150,718 sq ft (14,002 sq m)

No floorplan plan

Key features

- Grass

Description

Lot 3 – A grass paddock close to the village of Beech Hill and suitable for equestrian use, with excellent access. About 3.46 acres

Situation

The Beech Hill Estate lies in a fantastically convenient location to the south of the M4 and the north of the M3.

REQUESTED BY:
Strutt & Parker, National Estates & Farm Agency
41 Colindale Avenue, London,
NW9 1BE
Phone: 020 8346 3000 Email: sales@strutt-parker.com

Call agent Request details

TRACK SALES TO MAKE SMARTER MOVES

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Automatically saved to screenshots folder
Mark up and share

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rightmove Buy Rent House Prices Find Agent Commercial Inspire Overseas My Rightmove



Lot 6 - The Beech Hill Estate, Beech Hill, Reading, Berkshire

Gross Price
£300,000

PROPERTY TYPE
☐ Land

SIZE
71,874 sq ft
6,637 sq m

No floorplan plan 

Key features
• Grass

Description
Lot 6 – Building plot at Beech Hill Road
About 1.65 acres

A small rectangular area of rough land, with some derelict former farm or garden structures, with potential for residential development subject to planning. Including a paddock fronting the Foundry Brook. Located at the

See similar properties →




MARKETED BY
Strutt & Parker, National Estates & Farm Agency
43 Colinger Street, London,
SW6J 2PL
Member of the National Association of Estate Agents



[Call agent](#)

[Request details](#)

Screenshot Test

Screenshot copied to clipboard
Automatically saved to screenshots folder.

Mark up and share

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 6

All 68 sites excluding geographically unconnected sites
spreadsheet

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 7

All 37 sites excluding those identified in the HELAA as not available, achievable or deliverable spreadsheet

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 8

Final refined list of sites, excluding those in Flood Zone 2 or 3 spreadsheet

Flood Risk Sequential Test

Old Forest Road, Wokingham



Appendix 9

Brownfield Land and Adopted Land spreadsheet

Peter Warren
Associate Director

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+44 (0) 7807 999 293
pwarren@savills.com

Mountbatten House
1 Grosvenor Square
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+44 (0) 7815 504 514
jack.bell@savills.com

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SO15 2BZ

Becky Rayner
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becky.rayner@savills.com

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