



Flood Risk Sequential Test

Weybridge Business Park, Addlestone Road,
Addlestone, KT15 2UP

July 2023

Executive Summary

Introduction

This Flood Risk Sequential Test has been prepared by Be First Planning Consultancy on behalf of Bridge UK Properties 7 LP ('Bridge Industrial') in relation to the proposed redevelopment of Weybridge Business Park, Addlestone Road, Addlestone, KT15 2UP ('the application site').

The purpose of this Flood Risk Sequential Test is to compare the application site within other available sites to find which has the lowest flood risk and confirm if the application site is the most suitable for the proposed development.

Site context

The c.3.7 ha application site is located within the administrative area of Runnymede Borough Council ('RBC'). The majority of the application site is located in Flood Zone 2, with a small section near Addlestone Road in Flood Zone 3a.

The application site is designated in a Strategic Employment Area (SEA5: Weybridge and Bourne Business Park and Waterside Trading Estate) in Runnymede Borough Council's Local Plan 2030. It is proposed to comprehensively redevelop this vacant, brownfield site to construct new employment floorspace (Flexible Class B2, B8, E(g)(ii-iii)).

Sequential Test

A Flood Risk Sequential Test was not carried out for the application site as part of the production of RBC's Local Plan 2030; as such, in accordance with the National Planning Policy Framework ('NPPF') (2021), the submission of a Sequential Test is required.

The methodology and scope of sites to be searched and assessed has been agreed with RBC through pre-application discussions.

A total of seven sites that met the agreed search criteria were identified for the assessment. All seven were ultimately discounted as not representing reasonably available or suitable sites for development. The Sequential Test has been passed; the application site is the only suitable site available for the proposed development.

Exception Test

In this case, the proposed industrial uses are defined as 'less vulnerable'. As set out in Table 3 within the Technical Guidance to the National Planning Policy Framework (March 2012) less vulnerable uses are considered appropriate within Flood Zones 2 and 3. An Exception Test is not, therefore, required.

1. Introduction

- 1.1 This Flood Risk Sequential Test has been prepared by Be First Planning Consultancy on behalf of Bridge UK Properties 7 LP ('Bridge Industrial') in relation to the proposed redevelopment of Weybridge Business Park, Addlestone Road, Addlestone, KT15 2UP ('the application site').
- 1.2 This Sequential Test has been prepared following discussions with Runnymede Borough Council ('RBC') through formal pre-application engagement.
- 1.3 The purpose of this Flood Risk Sequential Test is to compare the application site within other available sites to find which has the lowest flood risk.

Site context

- 1.4 The application site is located within the administrative area of RBC. The application site measures circa 3.7 ha in size and is split into two individual plots separated by Addlestone Road. Both plots contain existing, vacant office buildings with ancillary on-site car parking and some limited landscaping.
- 1.5 The majority of the application site is located in Flood Zone 2, with a small section near Addlestone Road in Flood Zone 3 (see Figure 1.1).

Figure 1.1 (below): Flood Zones

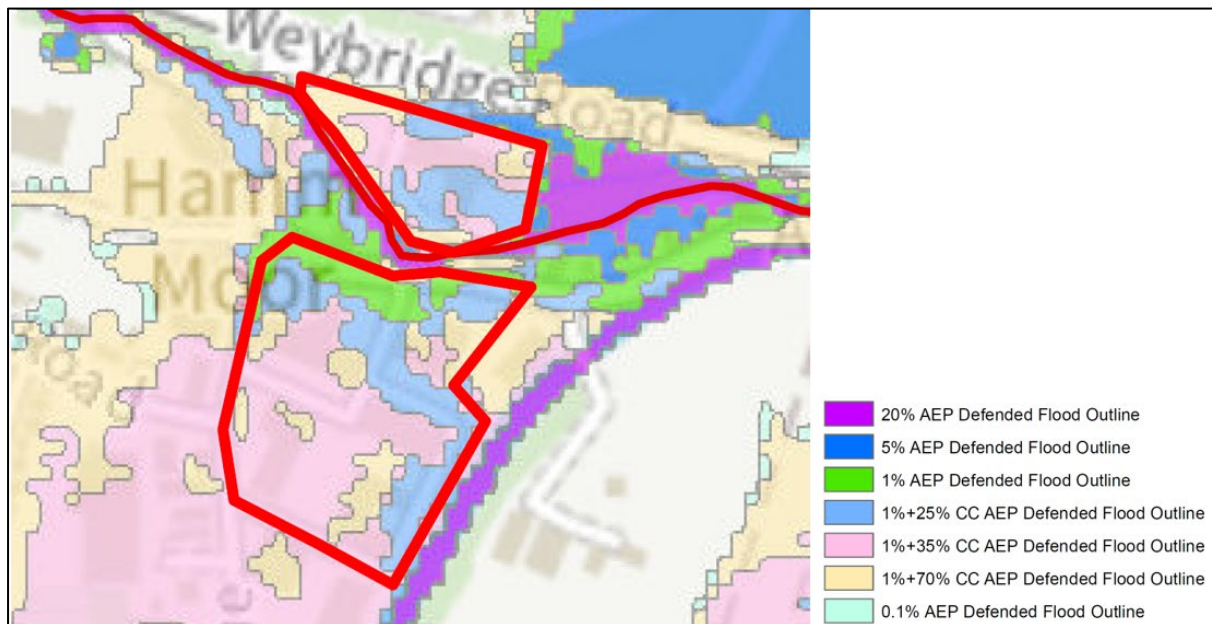
Source: <https://flood-map-for-planning.service.gov.uk/> (accessed 20 June 2023)



- 1.6 More detailed flood modelling has been obtained from the Environment Agency by HDR in support of a separate Flood Risk Assessment. This has provided more accurate data, as shown in the extract in Figure 1.2 below.

Figure 1.2 (below): Flood modelling data

Source: Environment Agency 'Product 4' Detailed Flood Risk for Addlestone Road (obtained by HDR)



- 1.7 Flood Zone 3b (functional flood plain) is defined in RBC's Level 2 Strategic Flood Risk Assessment as "*undeveloped land with an annual probability of flooding of 5% (1 in 20 year)*"¹. Land with a 5% (1 in 20 year) probability of flooding is shown in dark blue in Figure 1.2 above. As can be seen, the site does not contain any land which has been assessed by the Environment Agency as having a 5% (1 in 20 year) probability of flooding.
- 1.8 A Flood Risk Sequential Test was not carried out for the application site as part of the production of RBC's Local Plan 2030; as such, in accordance with the National Planning Policy Framework ('NPPF') (2021), the submission of a Sequential Test is required.
- 1.9 The Site is designated in a Strategic Employment Area (SEA5: Weybridge and Bourne Business Park and Waterside Trading Estate) in Runnymede Borough Council's Local Plan 2030.
- 1.10 It is proposed to comprehensively redevelop this vacant, brownfield site to construct new employment floorspace (Flexible Class B2, B8, E(g)(ii-iii)).

¹ Para 3.2, RBC's Level 2 Strategic Flood Risk Assessment (May 2018)

2. The Planning Context

- 2.1 The NPPF (2021) states that inappropriate development in areas of flood risk should be avoided and should be directed away from areas at highest risk. Paragraph 161 goes on to state that all plans should apply a sequential, risk-based approach to the development, which can be applied through a sequential test and if necessary, an exception test.
- 2.2 The Runnymede Local Plan (2030) Policy EE13: “Managing Flood Risk” states that new development will be guided to areas of lowest flood risk from all sources of flooding through a sequential test.
- 2.3 Add site allocation details from local plan as relevant planning context similar to paragraph 4 of the ex summary. May want to move 1.9 and 1.10 here?

The need for a Sequential Test

- 2.4 As detailed in the NPPF and Policy EE13 of the Local Plan, the aim of a sequential test is to steer development away from areas of high risk of flooding to areas with the lowest risk of flooding from any source.
- 2.5 The majority of the application site is located in Flood Zone 2, with a small section near Addlestone Road in Flood Zone 3. Detailed Flood Modelling has been obtained from the Environment Agency
- 2.6 A Flood Risk Sequential Test was not carried out for the application site as part of the production of RBC’s Local Plan 2030; as such, in accordance with the National Planning Policy Framework (‘NPPF’) (2021), the submission of a Sequential Test is required to support the planning application.

The need for an Exception Test

- 2.7 The NPPG states that if it is not possible for the development to be located in areas of lower flood risk then an Exception Test may need to be applied. The need for an Exception Test is dependent on the site’s flood risk and the use(s) proposed.
- 2.8 In this case, the proposed industrial uses are defined as ‘less vulnerable’. As set out in Table 3 within the Technical Guidance to the National Planning Policy Framework (March 2012) less vulnerable uses are considered appropriate within Flood Zones 2 and 3. An Exception Test is not, therefore, required.

3. Methodology

3.1 This section explains the methodology followed in the preparation of this Sequential Test.

Consultation with Runnymede Borough Council

3.2 This Sequential Test has been prepared in consultation with RBC. Following a pre-application meeting in May 2023, RBC confirmed the scope of sites to be searched as follows:

- Area of search is borough wide (i.e. within the administrative boundary of RBC).
- Area of search is to be kept to designated Strategic Employment Areas and sites allocated for solely employment use as set out in the Local Plan 2030.
- The site search should identify:
 - The site's flood risk.
 - If the site was available for development.
 - If the sites(s) were suitable to accommodate the proposed development.

Area of Search

3.3 The sites searched as part of this Sequential Test were identified through the following means:

- A review of the designated Strategic Employment Areas and the allocated employment site as detailed in the Runnymede Local Plan 2030.
- A review of Runnymede Borough Council Policies Map which displays a number of key planning designations, including flood risk, greenbelt, Strategic Employment Areas, and allocated employment sites.

3.4 The site search resulted in a total of 7 sites which met the search criteria. These sites were then assessed as to whether they are sequentially preferable and available and suitable for the proposed development. A full assessment of each of the sites can be found in Appendix A.

Site Review

3.5 Sites within a higher flood risk level than the application site were discounted immediately as they are not sequentially preferable and, it is clear, as set out in the NPPF, that development should be steered away from sites at a higher risk of flooding.

- 3.6 The remaining sites were assessed as to whether they were available for development in the short to medium term and suitable for a development similar to the proposed scheme. Contact has been made with local agents to confirm if sites are available, as listed in Appendix 2.
- 3.7 In assessing sites in lower flood risk zones, we assessed sites using the following criteria to determine availability and suitability:
- If the site is within the Metropolitan Green Belt.
 - If the site is available for development.
 - If the site is being actively pursued for development by a 3rd party through the subject of a current planning application or an extant planning permission.
 - If development has recently been completed on site.
 - If there are significant site constraints, such as ecological designations.
 - The presence of an on-site Conservation Area or a Listed Building which could preclude or limit the redevelopment of the site.
 - Inappropriate neighbouring uses which would warrant the redevelopment of the site for the proposed uses unacceptable.
 - Access constraints such as public transport constraints.
 - Any other unique site-specific considerations that could warrant the site unsuitable or unavailable.

4. Results

4.1 A total of seven sites that met the agreed search criteria were identified for the assessment. All seven were ultimately discounted within the Sequential Test as not representing reasonably available or suitable sites for development on the following grounds:

- Of the seven sites, three were discounted due to higher flood risk zones than the applicant's site (1- Bourne Business Park, 3 – Byfleet Road, New Haw, 6, The Causeway and Pinetrees Business Park.)
- Of the four sites that were in lower flood zones, Hillswood Business Park (Site 3), was discounted due to its allocation in the greenbelt.
- Site 2 – Waterside Trading Estate was not suitable, despite lower flood risk as it is significantly smaller site than the application site and was not suitable for the proposed development.
- Site 5 - Longcross Park Enterprise Zone was discounted due to no land purchase opportunities and subject to extant planning permission granted for data centre and film studios.
- Site 7 – Thorpe Industrial Estate was discounted due to poor accessibility in comparison to the Applicants site and to not being available.

4.2 The full results of the sequential test exercise are presented in a tabulated format at Appendix A clearly identifying the subject site, its site area and a commentary explaining why the site has been discounted. For comparison, the application site is included within the assessment.

5. Conclusion

- 5.1 The site is located partially in Flood Zone 2 and 3. As it falls in Flood Zone 2 and 3, a Sequential Test has been undertaken in accordance with the NPPF and its accompanying guidance the NPPG.
- 5.2 The Sequential Test methodology is based upon correspondence with RBC, with a total of seven sites identified.
- 5.3 Of the seven sites identified, only four were at a lower risk of flooding and were taken forward for further assessment. At the second stage of assessment, it was determined that none of these remaining four sites were available or suitable for the proposed development and, therefore, none are alternative sites that could accommodate the proposed development.
- 5.4 The Sequential Test has been passed. The application site is the only reasonable site which could accommodate the proposed development.

Appendix 1: Sequential Test Assessment

Stage 1				Stage 2	Stage 3 - Sequential Test									
Site No.	Source	Address	Site Area	Site Ownership	Policy designations	Flood Zone Designation(s)	Flood Zone 2 land %	Flood Zone 3a land %	Flood Zone 3b land %	Relevant planning history	Is it available?	Is it sequentially preferable?	Is it suitable?	Is it an Alternative Site?
Weybridge Business Park (Application Site)	Local Plan 2030	Weybridge Business Park	3.72ha	Bridge Industrial	Strategic Employment Area IE2 Small area within northern plot is Green Belt	2 and 3a	c.99	c.1	0		Yes - In ownership of the applicant		Yes	
1	Local Plan 2030	Bourne Business Park	4ha	Mixed Straits Real Estate, CBRE, Hollis Hockley	Strategic Employment Area IE2	2, 3a, 3b	c.65	c.30	c.5	RU.21/2095 - Refurbishment and extension of the existing office building (Consent granted). RU.19/1018 -New Ancillary Gym and studio (Approved).	No - Offices have been recently refurbished and occupied. The three vacant available units are marketed to let and not for sale.	No	No	No This site is not sequentially preferable as the site has a much larger proportion of the site within flood zone 3a and 3b, in comparison to the application site. Further, the site is not available for development as the site is occupied and not available for sale.
2	Local Plan 2030	Waterside Trading Estate	2.5ha	Mixed	Strategic Employment Area IE2	2	100	0	0	RU.17/1751 - Subdivision of Unit 10 and associated external alterations	No - Site is occupied and there is no prospective land or site for sale.	Yes	No	No Whilst the site does not contain any Flood Zone 3 land, the site is not considered to be a reasonable alternative site as it is significantly smaller than the application site and will not accommodate the proposed development. In addition, the site has unclear/multiple ownership and with very little vacancy, which makes the procurement of the site unfavourable, in comparison the applicants site which is in Bridge Industrial's ownership and is fully vacant ready for developing.
3	Local Plan 2030	Byfleet Road, New Haw	7.7ha	Savills	Employment site Allocation - 20000sqm B1c/B8 floorspace. Limited B2	2 and 3a	c.20	c.58	0	RU.21/0207 - 17491sqm - Class E(g)/B2/B8 - Consultation period, still awaiting decision	No - development is being actively sought on site for a scheme similar to the maximums set out in the allocation; therefore, it is being actively pursued by a 3rd party and is not	No	No	No This site is not sequentially preferable as a larger proportion of the site sits within Flood Zone 3 than the application site. In addition, it is clear that a third party is actively trying to redevelop the site and, therefore, the site is not available nor suitable for the proposed development.

Stage 1				Stage 2	Stage 3 - Sequential Test									
Site No.	Source	Address	Site Area	Site Ownership	Policy designations	Flood Zone Designation(s)	Flood Zone 2 land %	Flood Zone 3a land %	Flood Zone 3b land %	Relevant planning history	Is it available?	Is it sequentially preferable?	Is it suitable?	Is it an Alternative Site?
											available for the proposed development.			
4	Local Plan 2030	Hillswood Business Park	14.9ha	Legal and General	Strategic Employment Area IE2 Green Belt	None	0	0	0	RU.21/1805 - Erection of two ancillary outbuildings to be used as an office and other landscaping works, amendments to existing office buildings (Approved).	No - Offices recently refurbished and occupied by Samsung and Regus. 3000 Hillswood Drive is being currently marketed as office space to let.	Yes	No	No Whilst the is sequentially preferable from a flood risk perspective, the site is not considered a reasonable alternative site as it is allocated in the Green Belt. The application site is a brownfield site, where the NPPF and the Local Plan (2030) encourages and promotes for development over Green Belt and greenfield. The offices of Hillswood Business Park were recently refurbished and built and are occupied and are not being promoted for sale; therefore, the site is also not available for development.
5	Local Plan 2030	Longcross Park Enterprise Zone	17.7ha	Crest Nicholson and Aviva Investors	Strategic Employment Area IE2. Enterprise Zone	None	0	0	0	RU.13/0856 - Hybrid application for demolition of site and provision of 79025sqm B1, 36000 SQM Sui Generis Data centre, 200 dwellings, A1-A5 use, D1 use, D2 use. RU.21/0780 - Data Centre, RU.17/1307 - 16765 sqm of B1, Office, RU.17/1191 - Reserved matters for development of 3 storey building for A1-A5 and B1 use, RU.19/1851 - Erection of 3 replacement film studios at Longcross Film Studios. RU.21/0780 - Phase 3 Reserved Matters development of data centre campus (phase 3 of 13/0856) (Approved).	No- North of the site is occupied and in use as a film studios. The south of the site has been sold recently with planning permission granted for development of a data centre campus.	Yes	No	No Whilst the site is sequentially preferable from a flood risk perspective, it is not a reasonable alternative site as it is not available for purchase. The south of the site has recently been sold to Ark Data for a Data centre, offices and associated works which was approved and is under construction with conditions actively being submitted. The north of the site is primarily occupied by Longcross Film Studios, which recently was granted planning permission for replacement and refurbishment. The application site is, however, in full ownership by Bridge Industrial, vacant, and ready for redevelopment.

Stage 1				Stage 2	Stage 3 - Sequential Test									
Site No.	Source	Address	Site Area	Site Ownership	Policy designations	Flood Zone Designation(s)	Flood Zone 2 land %	Flood Zone 3a land %	Flood Zone 3b land %	Relevant planning history	Is it available?	Is it sequentially preferable?	Is it suitable?	Is it an Alternative Site?
6	Local Plan 2030	The Causeway and Pinetrees Business Park	28.6ha	BNP Paribas (Pinetrees and Lotus Park). Vixen Jersey Ltd (Causeway)	Strategic Employment Area IE2.	2, 3a,3b	c.80	c.60	c.10	RU.19/0465: Redevelopment and erection of commercial buildings - A1, B1(b)/B1, B2, B8, C1 Hotel, car parking, supermarket. RU.12/0777: Remodelling and extension of office building.	No - Planning permission has been granted for one section of the Causeway. Pinetrees is currently being marketed as refurbished office building to be let. Site is also occupied by water treatment works, Tesla, Homebase, Watermans Business Park. Lotus Park is being marketed and occupied as office space. There is currently no land available for sale.	No	No	No The site is not sequentially preferable as the site is in three flood zones including flood zone 3a and 3b which make up 70 percent of the land. The site is also being actively marketed as office space and parts of the site have been recently sought after and granted planning permission for development. Other plots of the site which are not being marketed are occupied by businesses and a water treatment works which if sought for development will need to be decontaminated. The site is not available for development.

Stage 1				Stage 2	Stage 3 - Sequential Test									
Site No.	Source	Address	Site Area	Site Ownership	Policy designations	Flood Zone Designation(s)	Flood Zone 2 land %	Flood Zone 3a land %	Flood Zone 3b land %	Relevant planning history	Is it available?	Is it sequentially preferable?	Is it suitable?	Is it an Alternative Site?
7	Local Plan 2030	Thorpe Industrial Estate	17.4ha	Mixed	Strategic Employment Area IE2.	2	c.65	0	0	RU.22/1894: Redevelopment and replacement, extension of existing warehouse for B8 use (awaiting decision). RU.17/0801- Erection of 5 no. flexible light industrial units for use as B1 (offices/light industry) and B8 (storage and distribution) uses (granted consent). RU.15/0652 - Erection of three buildings subdivided into twelve units for employment uses B1(c), B2 & B8 including associated roads, parking, service areas and landscaping.	No - the land is not actively being marketed. Some units are being advertised for let but due to the mixed ownership there would be a significant challenge with gathering the required land for development. In addition, planning permission is being sought for part of the site suggesting a 3rd party is actively trying to redevelop part of the Site.	Yes	No	No Whilst the site is sequentially preferable from a flood risk perspective, is not considered an alternative site as the site has unclear and multiple ownership which is difficult to procure. This site is also disadvantageous regarding location and transport in comparison to the application site, which is in 15-minute walking distance of public transport nodes.

Appendix 2: Summary of contact made with local agents to assess site availability

Company	Date of email	Response from Agent
Christopher Thomas	15/06/2023	No sales currently.
Savills	14/06/2023	
Kempton Carr Croft	15/06/2023	
Montague Evans	15/06/2023	
Knight Frank	14/06/2023	
JLL	15/06/2023	
Colliers	15/06/2023	
Franklin Commercial	15/06/2023	