


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:		Mr
First Name:*		Taylor
Last Name:*		Cherrett
Job title (where relevant):		Director
Organisation (where relevant):	Panattoni	Turley
Address* Please include postcode:	C/O Turley	The Pinnacle 20 Tudor Road Reading RG1 1NH
Email address:*		████████████████████
Telephone number:		

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Turley on behalf of Panattoni
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	See accompanying representations
Policy:	See accompanying representations
Appendix:	See accompanying representations
Policies Map:	See accompanying representations
Other:	See accompanying representations

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

We do not believe the plan is legally compliant in relation to its assessment of employment provision within the Sustainability Appraisal.

See accompanying representations

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

See accompanying representations

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

No comment

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See accompanying representations

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Our position is that the site should be included as a proposed employment allocation and that the LPR does not provide enough sites to provide sufficient employment land.

We can assist the inspector in their consideration of the Local Plan and associated evidence.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature		Date	03.03.23
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

Representations to the Submission Version of the West Berkshire Local Plan Review

Regulation 19 Consultation

Land at Hoad Way, Theale

March 2023

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Appendix 1: Site Location Plan

Appendix 2: Turley Landscape and Visual Impact Appraisal

Appendix 3: Masterplan(s)

Taylor Cherrett



Karen Barnes



Client

Panattoni

Our reference

FIRS3002

3rd March 2023

1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Panattoni in response to the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023).
- 1.2 Our client has important land interests in the Local Plan area, in particular land to the north of the A4, to the east of Theale. A copy of the Site Location Plan is provided at **Appendix 1**.
- 1.3 These representations have been based upon the contents of the latest consultation document and its evidence base but also have had regard to all previous representations made by Panattoni to West Berkshire Council (WBC).
- 1.4 Representations were submitted to the December 2020 Emerging Draft consultation. At that time the site was a draft allocation (Policy EMP6). It has since been removed in the Proposed Submission version of the Plan on the basis of landscape impact concerns raised by the Council's landscape consultant.
- 1.5 The site is considered in the West Berkshire Housing and Economic Land Availability Assessment January 2023 under reference THE8.
- 1.6 The structure of these representations is as follows:
 - Context;
 - Comments on Regulation 19 Local Plan;
 - A review of land at Hoad Way, Theale in line with paragraph 67 of the NPPF; and
 - Summary & Conclusions.
- 1.7 At present Panattoni object to the draft Local Plan on the basis it has an identified shortfall in the employment requirement despite suitable sites such as land at Hoad Way, Theale being suitable and available for employment development. These representations set out Panattoni's case in this regard.

2. Context

The National Planning Policy Framework (NPPF)

- 2.1 The NPPF provides the Government's overarching policy for planning.
- 2.2 The NPPF requires that the planning system should be genuinely plan-led. Local plans are subjected to examination in order to assess whether they are legally compliant (for example with respect to the Duty to Cooperate and Sustainability Appraisal) and sound.
- 2.3 Paragraph 35 of the NPPF sets out that:
- "Plans are sound if they are:*
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."*
- 2.4 It is within the context of paragraph 35 of the Framework that these representations have been prepared.
- 2.5 A updated NPPF is currently the subject of consultation until March 2023. Transitional arrangements are set out within the consultation document at paragraph 225 noting that:
- "For the purposes of the tests of soundness in paragraph 35 and the policy on renewable and low carbon energy and heat in plans in paragraph 156, these policies apply only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage, or that reach this stage within three months, of the publication of this version"*
- 2.6 As a result, the West Berkshire Local Plan will be assessed against the provisions of the July 2021 NPPF and assessed against the tests of soundness set out above.

3. Comments on draft Local Plan

Vision and Objectives

- 3.1 The Vision of the Plan states that West Berkshire will provide the space and environment for employment opportunities, and:

“A variety of different sectors together with a combination of larger businesses and small and medium-sized enterprises will ensure a resilient and sustainable economy. The local economy will help to create benefits for the environment, culture and social well-being.”

- 3.2 The Vision goes on to say:

“Development will be better connected to local services, facilities and open space within the District, and where relevant, in adjoining local authority areas, by favouring more sustainable means of travel including reducing the need to travel, all of which will foster community cohesion, health and wellbeing.”

- 3.3 Strategic Objective 4 relates to the economy and notes:

“To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.”

- 3.4 Panattoni support the Vision and Objectives set out within the Local Plan but raise significant concerns about whether these can actually be met given that the Council have acknowledged that there remains a shortfall of 32,709sqm of industrial land which is not met through allocations in the Plan.

- 3.5 The failure to allocate land to meet this shortfall does not comply with paragraph 82(b) of the NPPF which notes that planning policy should “*set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*” [our emphasis]

- 3.6 It is Panattoni’s position that additional land needs to be allocated to at least meet the shortfall and provide a sufficient buffer to ensure a resilient economy.

Policy SP20: Strategic Approach to Employment Land

- 3.7 The purpose of Policy SP20 is stated as setting a framework to facilitate and promote the growth and forecasted change of business development across the District over the plan period to 2039.

- 3.8 The Policy sets out that “*Through the LPR the Council will seek to facilitate the growth and forecasted change of business development over the plan period by promoting the supply of office and industrial space across the District to meet the identified shortfall.*”

- 3.9 To inform the Local Plan Review (LPR) the Council undertook an Employment Land Review (ELR 2020) which was completed prior to the Covid 19 pandemic and prior to

the UK exiting the EU. The Council therefore updated the ELR in 2022 using the most recent economic forecasts which take account of the major macro-economic changes which have taken place and provides up to date evidence.

3.10 The key findings of the Employment Land Review Addendum (December 2022) are:

- A requirement of 91,109sqm or 23ha of industrial land to 2039 to meet identified needs. With 64,000sqm in the known supply, the report recommends the plan should look to accommodate a minimum of 155,000sqm of industrial floorspace to 2039 (resulting in the 91,109 sqm additional requirement).
- The conclusion states that the floorspace requirement needs to be seen in the context of the whole plan period, and

“Given the need to address a current market shortage for industrial space there is, unlike for offices, a more pressing need to frontload the plan with a readily available pipeline of space. So, we suggest that as much as possible of this 23ha minimum should be allocated on easily deliverable sites.

No single site, devoid of major constraints has been identified through the HELAA that is capable of meeting the whole shortfall for industrial floorspace. Two sites are promoted that are generally unconstrained and cumulatively could bridge 8.2 ha of the quantitative gap. The balance to find reduces to a minimum 15 ha and a further 10 sites have been assessed as having potential for employment use subject to other policy considerations.”

- The report concludes that *“should all other options fail to adequately meet demand, consideration should be given to providing new industrial floorspace as part of any potential large housing allocations, providing walk to work opportunities. Albeit this route would only deliver smaller and lighter units, but these are in demand, and viable in the East (Reading market area), although less so elsewhere.”*

3.11 The ELR review also states that:

“the previous assessment identified that Theale’s proximity to junction 12 of the M4 means that it is an attractive location for B8 distribution (specifically last mile servicing Reading). As supply has further tightened along the M4 corridor towards London demand for space close to motorway junctions, such as at Theale has increased since the previous assessment.”

3.12 The report states that West Berkshire has become *“a viable location for largescale warehouse and distribution uses due to a dearth of availability elsewhere in the Thames Valley.”* There is an identified lack of available stock for last-mile distribution, with occupiers finding it difficult to satisfy their requirements.

3.13 Panattoni wholly agree with this position.

3.14 In addition, WBC prepared a Employment Background Paper (January 2023), which forms part of the evidence base to the draft plan. The report explains the approach taken by West Berkshire Council to employment land in the draft Plan. Sites considered for

allocation to meet the requirement identified in the ELR (2022) were identified through the HELAA, which forms part of the evidence base for the Plan. The sites were then selected through the Site Selection Methodology Paper (January 2023).

- 3.15 The Employment Background Paper (2023) states *“Since the publication of the Emerging Draft LPR in 2020 there have been a number of changes to the evidence and status of the identified sites which resulted in a review of all the HELAA sites and some changes to the sites proposed within the Regulation 19 Proposed Submission LPR.”*
- 3.16 The updated evidence highlighted a shortfall in the supply of office floorspace over the plan period and so it was necessary for the Council to look again at the evidence and reassess all the HELAA sites promoted for employment use.
- 3.17 In addition, further technical evidence was gathered on the sites to assist in making an informed decision.
- 3.18 Based on the proposed employment land allocations in the draft Plan, there remains a shortfall of 32,709sqm of industrial land.

Panattoni Comments on Policy SP20

- 3.19 The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt and places significant weight on the need to support economic growth and productivity (paragraph 81).
- 3.20 It goes on to state at paragraph 82 that Planning policies should:
- “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) set criteria, or identify strategic sites, for local and inward investment to match the In a strategy and to meet anticipated needs over the plan period;*
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*
- 3.21 The draft Local Plan Review is not considered to have been drafted to meet the policy bar set out within the NPPF for the following reasons.
- 3.22 It is concerning that no reference is made within the policy to the actual requirement / need for employment uses over the plan period. The ELR 2022 sets out a need for:
- 50,816sqm (minimum) of new office floorspace; and
 - 91,109sqm (minimum) of new industrial floorspace.

- 3.23 These requirements should be enshrined in policy. Without the actual requirement identified there is no policy requirement for the employment need to be met. Without which the Policy cannot be considered to be positively prepared, effective or consistent with national policy. The policy requirement should also be treated as a minimum as set out within the evidence base.
- 3.24 The current shortfall in employment land should also be enshrined in Policy. This is to ensure that the policy proactively seeks to identify solutions and sets out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and clearly set out by the NPPF.
- 3.25 At present the policy simply does not achieve this.
- 3.26 This position is further exaggerated by the supporting Sustainability Appraisal (SA). The SEA/SA Regulations Schedule 2(8) requires an *“assessment of reasonable alternatives”* and the identification of the *“reasons for selecting the alternatives tested in the light of the others available.”* In *Ashdown Forest Economic Development LLP v SSCLG and Wealden DC* [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware *“The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.”*
- 3.27 The SA has not considered the impact of not meeting employment need, nor has it considered an Option where the employment need is met in full. The only options considered at a strategic level for economic development are:
1. Retain separate employment and town centre policies
 2. Combine employment and town centre policies into a single policy
- 3.28 These options are not relevant to the consideration as to whether employment need has been met.
- 3.29 Panattoni consider that the Council’s approach to considering the options for employment need is fundamentally flawed. The Council does not appear to have considered any scenarios in relation to the employment needs, whether that be the impact of the shortfall and meeting or exceeding the employment need over the plan period.
- 3.30 Further and in relation to Policy SP20 and specifically criterion 10, which assess whether policies *“support a strong, diverse and sustainable economic base which meets identified needs”*, the SA finds that *“the policy is likely to have a positive / significantly positive impact on economic sustainability as it seeks to support the economic base.”*
- 3.31 It is not clear how the SA can establish that Policy SP20 will have a positive affect. The evidence base supporting the Local Plan clearly establishes that there is a shortfall against identified employment need and the SA must find that the policy has a negative affect against this criterion because it does not meet or address that shortfall. The SA is flawed in its consideration of Policy SP20.

- 3.32 The SA is therefore fundamentally flawed in its consideration of Policy SP20 and employment need and the legal test for the consideration of reasonable alternatives has not been met.
- 3.33 Paragraph 7.9 of the Local Plan sets out that *“whilst these allocations go some way towards meeting the identified need there remains a shortfall. As with the office requirement the Council has positively sought opportunities to meet the industrial requirement however, the District is heavily constrained and this has resulted in a lack of suitable available sites. Given the identified shortfall in supply the Council will commit to seek to address this matter again at the first five year review of the Local Plan.”*
- 3.34 We do not consider that the Council have positively sought opportunities to meet the industrial requirement. The fact is the Council have deleted a prevouls proposed allocation, specifically land at Hoad Way, Theale, a site which is free from statutory constraints such as AONB and located adjacent to the strategic road network. It has been deleted solely on landscape grounds, which we consider
- 3.35 A review to meet this shortfall is not considered necessary, for the reasons set out in these representations other available land exists which can support the Council in meeting their employment need. Specifically land at Hoad Way, Theale.
- 3.36 Notwithstanding our view that at least some of the shortfall can be met through the allocation of addition sites, the mechanism for a 5-year review is not included in policy. If a review is the means by which the Council are to meet the identified shortfall this also needs to be included as a policy requirement.
- 3.37 In relation to the Policy wording itself, we believe this is overly restrictive, especially in light of the identified employment shortfall.
- 3.38 The adopted Development Plan under Policy CS9 (Location and Type of Business Development), Point (a), highlights that in the absence of new employment allocations being identified through the adopted Development Plan, opportunities for employment development exist where the following policy requirements are satisfied:
1. *Compatibility with uses in the areas surrounding the proposals and potential impacts on those uses; and*
 2. *Capacity and impact on the road network and access by sustainable modes of transport*
- 3.39 Similar policy provisions are required in the draft Local Plan to provide flexibility to meet the identified employment needs and respond to the current shortfall.
- 3.40 Overall, Panattoni object to policy SP20 and consider it unsound. It has not met the tests of soundness as required by paragraph 35 of the NPPF.

Policy SP21: Sites Allocated for Employment Land

- 3.41 Policy SP21 ‘Sites allocated for Employment Land’ allocates six sites totalling approximately 68,781sqm of B2/B8/Egiii land.

- 3.42 The supporting text for the policy states the Council will seek to ensure that sufficient sites are provided in the right locations to foster sustainable economic growth. It also states that the allocated sites are focused around or near to areas of existing employment activity.
- 3.43 As a result of the need identified above we object to Policy SP21, as it does not identify sufficient sites to meet the employment requirement.
- 3.44 We consider further sites should be allocated for employment uses such as land at Hoad Way, Theale.

4. Land at Hoad Way, Theale – Proposed employment site

- 4.1 This part of the representations sets out an overview of Panattoni's land interest at land at Theale and the reasons why it should be allocated for employment use to help meet the need identified in the plan and its evidence base.
- 4.2 We consider the merits of the site below, in line with paragraph 67 of the NPPF, which underlines that local planning authorities should establish realistic assumptions about the availability, suitability and the likely economic viability of land across the District.

The Site and Surroundings

- 4.3 The site extends to an approximate area of 5.4ha comprising a vacant field broadly rectangular in shape with no built form or public access between the M4/Bath Road and the existing settlement of Theale (see the Site Location Plan at **Appendix 1**).
- 4.4 Power cables cross over the site and there is a pylon within the site itself.
- 4.5 The site is directly south-west of Junction 12 of the M4 providing strong strategic transport links. Bath Road provides access between Newbury and Reading.
- 4.6 The site abuts High Street to the north with a number of residential properties abutting the north-west corner of the site. Vehicular access along the High Street to the north of the site is limited by barriers, but cycle/ pedestrian access remains. This route leads to a footbridge across the M4 to Pincents Lane, Calcot.
- 4.7 The M4 is contiguous with the north-eastern boundary of the site save for a small inset on the northern corner which is associated with the existing Telecommunication Mast. The south-eastern corner joins the J12 slip road onto the M4. The A4 Bath Road that runs along the southern boundary of the site. These boundaries are screened by existing landscaping including established trees.
- 4.8 The western boundary aligns with Hoad Way connecting the A4 to Theale High Street. Adjacent uses comprise predominately road infrastructure (east, south and west) with a number of residential properties abutting the north-western boundary.
- 4.9 Within the immediate context of the site, Arlington Business Park and Theale Business Park lies to the south of the Bath Road, east and west of Waterside Drive. Arlington consists of mainly office buildings within a landscaped setting, whilst Theale Business Park comprises predominantly warehouse development with limited landscaping and increased focus on loading bays and parking associated with the distribution uses.
- 4.10 To the west of the site is James Butcher Drive where there are existing residential apartments accessed from Hoad Way. There is a tree belt along this boundary with well-established trees. Further west lies the centre of Theale with a range of residential, retail and commercial properties. To the north of the site there is a residential estate abutting an undeveloped field further east.

- 4.11 With regard to accessibility, the closest bus stops to the site are located on the High Street in Theale within 150m of the site. There are two main bus services that provide access between Reading Town Centre, Calcot, Thatcham and Newbury and run half hourly every day. The closest railway station is approximately 900m to the south-west of the site and offers services between Newbury, Reading and London Paddington.
- 4.12 This site is strategically located for employment led development and well positioned with the existing highways network.
- 4.13 The site lies partially within the Theale High Street Conservation Area and falls within Flood Zone 1 and 2. The site also falls within the AWE Outer Zone. The site is outside the existing settlement boundary of Theale which currently extends to the rear of the properties abutting the northern boundary and along the western edge of Hoad Way.
- 4.14 The Lower Pang Valley and Sulham Stream Biodiversity Area is located to the north of the site, on the other side of High Street. The AONB boundary is positioned to the north-east of the site and extends across the M4 to the east. It is noteworthy that the boundary of the AONB was established prior to the M4 being constructed.
- 4.15 The site has been subject to planning applications for employment uses:
- Application reference 20/00476 sought planning permission for 20,000sqm of commercial floorspace B1(c), B2 and B8. This was withdrawn in order to address comments received on the scheme.
 - Application reference 21/02029/COMIND sought planning permission for three employment units for flexible uses within Class E (light industrial), B2 and B8. This was withdrawn in order to address comments received on the scheme.

HELAA site assessment

- 4.16 The site was proposed as an emerging employment allocation (Land north of Arlington Business Park, Theale East Business Centre, Policy EMP6) in the 2020 Regulation 18 version of the Local Plan. The site was proposed to be allocated for 20,000sqm of employment floorspace.
- 4.17 In the Proposed Submission version, the site has been omitted as a proposed allocation. The Employment Background Paper (2023) states the reason as *“removed from the LPR following landscape assessment”*.
- 4.18 The site is considered in the West Berkshire Housing and Economic Land Availability Assessment January 2023 under reference THE8. The conclusion of the suitability section notes that:

“Suitability conclusions: A Landscape Sensitivity and Capacity Assessment has concluded that if the site was developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It is therefore recommended the site is not developed for employment uses.”

Suitability Assessment: Unsuitable

Availability Assessment: Available

Achievability Assessment: Not assessed due to site being unsuitable

- 4.19 Turley Landscape has undertaken a landscape and visual assessment (LVA) of the site and has reviewed the WBC assessment. This information was submitted, at the Council's request, to the Head of Planning Policy and Interim Head of Planning on 11th May 2022. Unfortunately, there is no reference with the Plan or the evidence base that the information has been considered in the formation of the Publication version of the Local Plan. For ease the information is submitted at **Appendix 2**.
- 4.20 It is Panattoni's position that both the Visual and Landscape Sensitivity of the site have been overstated and that the Landscape Capacity of the site is much greater than posited by the Council. The LVA sets out that the site is of Medium Visual Sensitivity, Medium/Low Landscape Sensitivity and has a Medium/High Landscape Capacity to accommodate future employment development.
- 4.21 Whilst the introduction of employment development on this site would result in harm to the character and appearance of the Site itself (as any employment development of green field sites would), the strong enclosure of the Site by existing roads, development and vegetation, the weak association of the site with the wider countryside and the association with other employment sites in the local context would mean that, (subject to an appropriate design and landscape strategy) development could be accommodated with few adverse landscape or visual effects beyond the Site itself.
- 4.22 As a consequence, the LVA considers that the site is an appropriate site for future employment development.
- 4.23 The following design principles would allow for employment development on the Site whilst minimising potential landscape and visual impacts:
- Focus principal development areas in the central and western parts of the site to maintain the separate identities of Theale and Calcot
 - Create a strong landscape belt along northern edge of the site to form a green corridor, provide screening of the northern edge of development and form an enhanced edge to the adjacent footpath route between Theale and the AONB;
 - Retain existing perimeter hedgerow and planting belts and reinforce with additional planting;
 - Integrate tree planting within and around development areas to provide screening and visual enclosure to the site, increase local biodiversity and soften the appearance of proposed buildings;
 - Incorporate pedestrian and cycle routes within site layout and connect with existing network of routes in the local area;

- Soften and screen car parking and goods yard areas with tree and hedgerow planting.

- 4.24 The submitted proposals have incorporated the recommendations.
- 4.25 The site comprises an area of rough grassland adjacent to the settlement edge of Theale. Existing employment and commercial land uses are located to the south and north-east of the site and the settlement of Theale lies to the west. The site is cut off from the wider countryside (including the AONB landscape to the north and north-east) by these areas of development and by the network of roads which encloses the site on all four sides. The site currently forms an open area of undeveloped land on the edge of the settlement and has no demonstrable attributes which elevate it above the ordinary in landscape or visual terms.
- 4.26 It is also important to note that the Council have also proposed residential uses in the emerging Regulation 19 Local Plan on the other side of the High Street. They have been assessed through the plan-making process including landscape terms and found acceptable. It is plain that the Council consider development in the vicinity of the site is acceptable.
- 4.27 The removal of the Site as a proposed employment allocation was unfounded and has compounded issues in relation to employment need within the Borough.

The Opportunity

- 4.28 Since the most recent application (21/02029/COMIND) was withdrawn in January 2022 the proposal has been re-visited. The revised proposals have been submitted under pre-application request 22/03049/PREOPD and are currently under consideration. The scheme seeks to address the comments received from Planning and Technical Officers during the course of that application, particularly in response to concerns over the landscape sensitivity of the site.
- 4.29 This has resulted in a scheme which increases the landscape buffers around the edges of the site and sets back the site creating more of a landscape setting for the site. The buildings have been further set back from High Street reducing their visibility from the Theale Conservation Area.
- 4.30 The landscape strategy for the site looks to create a strong landscape buffer that softens the interface between the site and the adjacent village of Theale. These buffers will be utilised for the creation of a mosaic of habitats while also reinforcing the existing boundary vegetation. Internally, the landscape design will seek to create an attractive formal business park feel through the use of hedgerow, larger stature trees, close mown grass verges and ornamental planting with breakout space created for the benefit of employees and visitors to the site.
- 4.31 The masterplans are provided as **Appendix 3** to these representations.

Site Suitability

Flood Risk and Drainage

- 4.32 In support of planning application 21/02029/COMIND a Flood Risk Assessment was prepared by BWB. The assessment demonstrated that the site lies within Flood Zone 2 and that modelling undertaken in the FRA with proposed mitigation embedded into the design of a scheme demonstrates that the site will lie in Flood Zone 1 post-development. SuDs features can be designed into the scheme, likely to be maintained by a management company in perpetuity.
- 4.33 Flood risk and drainage is not considered to represent a constraint to development of the site.

Ecology

- 4.34 A Preliminary Ecological Appraisal and a Preliminary Bat Roost Assessment was prepared by Middlemarch in support of application 21/02029/COMIND. This has been supplemented by a Walkover Survey to ensure the findings remain relevant.
- 4.35 Based on the finding of the ecological appraisals the site, ecology is not considered to represent a constraint to development.

Archaeology

- 4.36 A desk-based archaeological report was prepared by TVAS in support of application 21/02029/COMIND.
- 4.37 This demonstrated that the proposals are acceptable subject to the completion of a scheme of evaluation which can be dealt with through a future planning application and via a suitably worded planning condition.

Ground Conditions and Contamination

- 4.38 A Phase 1 and 2 Geo-environmental Assessment was prepared by BWB in support of planning application 21/02029/COMIND. This includes boreholes, puts and two preliminary rounds of ground gas monitoring.
- 4.39 The investigations confirmed that there was no visual or olfactory evidence of contamination with no identified contaminants above the health screening levels at the site. Ground gas protecting measures are not indicated to be required at the site.

Minerals

- 4.40 A Sand and Gravel Recovery Report was prepared by BWB, alongside the above Phase 1 and 2 survey, in support of planning application 21/02029/COMIND.
- 4.41 The report finds that deposits of sand and gravel exist at the site, however the deposit is likely to be economically and environmentally unviable due to:
- Limited suitable/ easily accessible resource thickness;
 - High groundwater levels and saturation of the gravel deposit;
 - Dewatering and stability issues, including associated costs; and
 - Vehicular movements and resultant environmental impact.

- 4.42 On the above basis, it is considered that the deposit would be of little commercial interest in line with the Replacement Minerals Local Plan (RMLP) Saved Policy 2.

Noise

- 4.43 A Noise Assessment was prepared by Tetrattech in support of application 21/02029/COMIND.
- 4.44 It concluded that *“Given the favourable results of the assessment described above and the inclusion of intrinsic mitigation as described within this assessment, no nearby businesses are expected to have unreasonable restrictions put on them as a result of the proposals. In addition, it is considered that the continued commercial/industrial use of the site will not have an adverse effect on the tranquillity of the areas and local access to areas of greater tranquillity.”*
- 4.45 Noise is therefore not a constraint to development of the site. The employment use of the site is not sensitive to the proximity of the M4.

Transport

- 4.46 A Transport Assessment was prepared by David Tucker Associates in support of planning application 21/02029/COMIND, following pre-application discussions with West Berkshire Highways and Highways England.
- 4.47 It confirmed that suitable vehicular access can be achieved onto Hoad Way, with the required visibility splays achieved.
- 4.48 The Transport Assessment finds that the percentage increase on any single movement will be a maximum of 5% during peak periods. This level of traffic is well within daily variation of background flow.
- 4.49 Assessments have been undertaken of the principle junctions around the site including the M4, which confirm they are well within their theoretical capacity.
- 4.50 The site is sustainably located. It is located within 150m of existing bus stops that provide half hourly services between Reading and Newbury. In addition, Theale Station is within 900m of the site with services between Newbury and London Paddington. The site is within walking distance of Theale High Street that provides a range of local services, as well as being within walking distance of residential development within Theale or Calcot to the east.
- 4.51 Parking and cycle parking can be provided in accordance with the relevant standards.
- 4.52 The proposed development will not result in an unacceptable impact on highway safety, and transport impact is therefore not considered a constraint to the allocation of the site for employment uses.

Air Quality

- 4.53 An Air Quality Assessment was prepared by Tetra Tech to support planning application 21/02029/COMIND.

- 4.54 The Assessment established that during the construction phase, site specific mitigation measures detailed within the assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.
- 4.55 During the operational phase, detailed dispersion modelling of traffic pollutants has been undertaken for the proposed development. The long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO₂) is determined to be 'negligible'. With respect to PM₁₀ and PM_{2.5} exposure, the effect is determined to be 'negligible' at all identified existing sensitive receptor locations. The effect at ecological receptors is not predicted to be significant.

Summary of Site Suitability

- 4.56 As demonstrated above the site is wholly suitable, with no technical constraints which would impede its delivery.

Site Availability

- 4.57 Panattoni is Europe's largest industrial and logistics developer with a track record of delivering over 320 million sq ft of commercial floorspace globally.
- 4.58 Panattoni has extensive experience of delivering high quality commercial facilities including warehouses, distribution centres and logistics parks throughout the UK, as well as across Europe.
- 4.59 As a result they have a substantial track record in the delivery of commercial development and can mobilise quickly. The site is available immediately and the site is deliverable in the short term.
- 4.60 Panattoni are engaging in pre-application discussion, with an application being prepared to be submitted imminently.
- 4.61 The site is available and can be delivered early in the plan period to support the employment need within the WBC.

Conclusions on Land at Hoad Way, Theale

- 4.62 The Site is located to the east of Theale which is a Rural Service Centre for the purposes of the adopted Core Strategy and is within an area of West Berks that has strong functional relationships with Reading, reflected within the Council's emerging Local Plan and the conclusions of the West Berkshire EDNA. The site is located within 150 metres of Theale High Street and 900m from Theale train station (serving the mainline London to the West Country route). The site provides opportunities for local residents to gain employment within an accessible and sustainable location.
- 4.63 The Site is within 500m of Junction 12 of the M4 and will provide a new employment development that provides easy access to the strategic road network offering convenient access to Heathrow, London, the West and the Midlands. This aligns with the priorities of the Thames Valley LIS in locating employment development close to motorway junctions.

- 4.64 This is one of the only sites within West Berkshire within such proximity to a motorway junction which is not constrained by the North Wessex Downs AONB. It should, therefore, be considered as a highly desirable location to meet the Council's employment needs and preferable to other sites within similar proximity to Junctions 13 and 14 of the M4.
- 4.65 The above position was recognised by West Berkshire Council through its Regulation 18 Local Plan which identified the site as a proposed allocation for employment land through emerging Policy EMP6 (Land north of Arlington Business Park, Theale East Business Centre).
- 4.66 The proposals will assist towards addressing the existing shortfall in industrial floorspace within not only West Berkshire but the wider Thames Valley. The proposals provide an opportunity to attract future occupiers to the District providing a range of unit sizes to support smaller to larger space requirements delivering additional business rates and employment opportunities for the District.
- 4.67 The draft Plan recognises that Theale will be a focus for additional housing through existing commitments and new allocations. Housing growth should be supported by economic growth, to enable residents to live close to where they work, promoting sustainable development and growth, reducing travelling. Land north of the Site is a proposed residential allocation in the draft Plan (Whitehart Meadow, Theale and Former Theale Sewage Works for 100 units and 70 units respectively).
- 4.68 The landscape comments in the 2023 HELAA are disputed. The site has limited landscape value due to its location adjacent the M4. The adopted residential site allocation on the east side of the M4 for 200 units is under construction, which itself is bounded to the north by employment and retail uses which bounds the M4. The site can be considered infill development
- 4.69 The site will contribute to the unmet employment need identified in the draft Plan and is suitably located to deliver a range of employment uses reflective of the needs identified in the employment background papers.

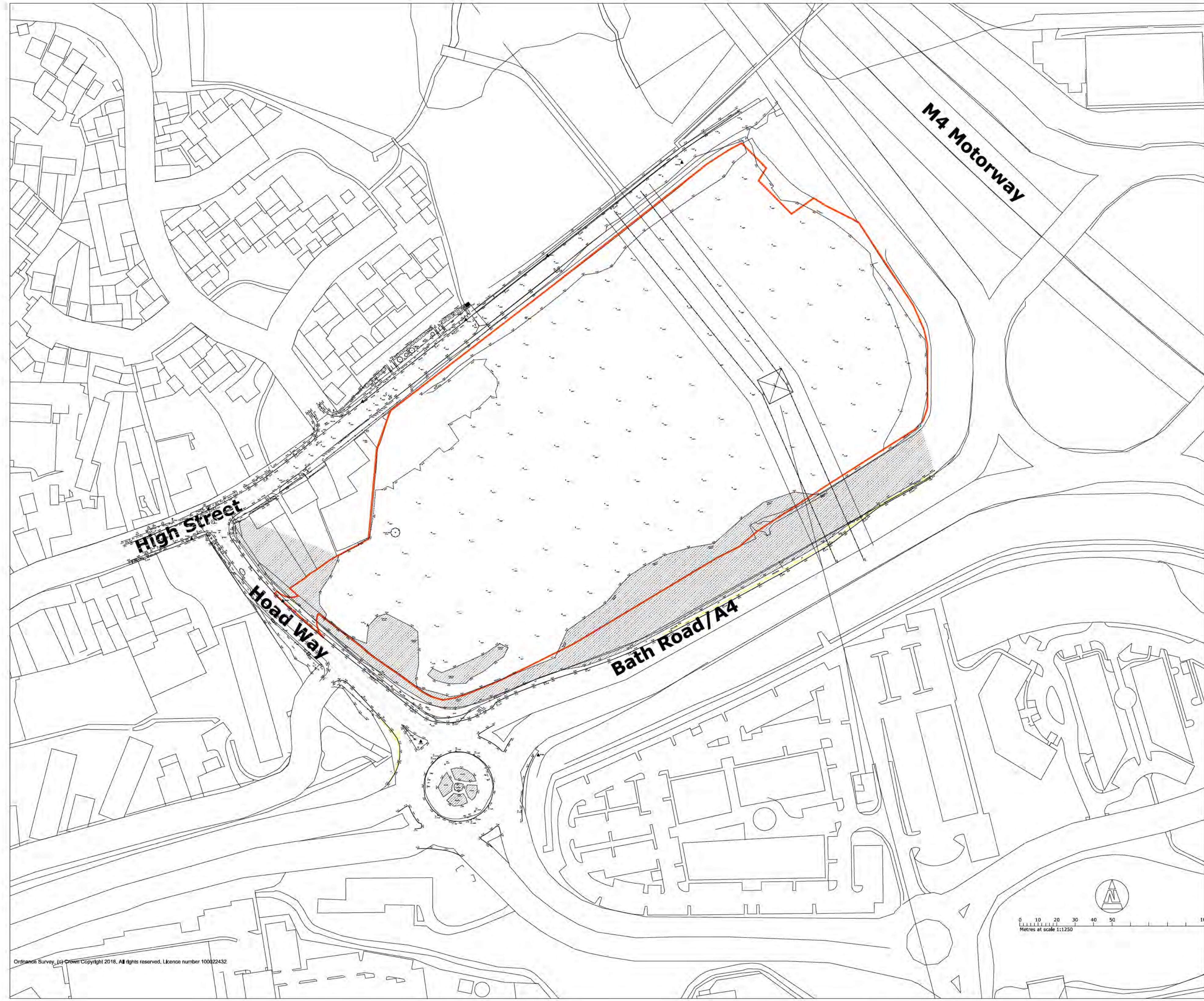
5. Summary and Conclusions

- 5.1 These representations have been prepared by Turley on behalf of Panattoni in respect of the West Berkshire Local Plan Review 2040 Proposed Submission (Regulation 19) Consultation (January 2023).
- 5.2 As set out in these representations the draft Local Plan does not meet the tests of soundness as set out by paragraph 35 of the NPPF and requires modifications. Specifically, the draft Local Plan has not identified sufficient sites to meet the identified need as set out within its supporting evidence base. Additional employment sites, such as land at Hoad Way, Theale is required to be allocated before the Plan can be found sound.
- 5.3 We reiterate that Theale is a key rural service area in the district that is able to support employment growth to support the district's unmet employment needs, supporting the proposed residential allocations north of the site, and contribute to maintaining a thriving rural area.
- 5.4 Land at Hoad Way, Theale is a sustainable and deliverable site that is under single ownership. Panattoni considers there are opportunities for the site to come forward early in the Plan period to meet an identified employment need.
- 5.5 There are no identified technical barriers to development, as identified through the technical studies summarised in these representations and submitted in support of the previous planning applications.
- 5.6 Panattoni look forward to working with the Council throughout the Local Plan process.

Appendix 1: Site Location Plan

Rev	Date	By	Description
C	13/12/2019	AZ	Planning comments incorporated
D	17/12/2019	AZ	Planning comments incorporated
D-F	17/12/2019	AZ	Planning comments incorporated
G	11/03/2020	LA	Scale bar amended

Red Line Area:
5.378 Ha/13.29 Ac



Appendix 2: Turley Landscape and Visual Impact Appraisal

Landscape Advice Note

Potential Allocation of Employment Land – Land to the east of Hoad Way, Theale

April 2022

Introduction

1. Turley Landscape and VIA have been commissioned by Panattoni UK Development Limited to undertake a baseline landscape and visual appraisal of a site to the east of Hoad Way, Theale and provide advice on the suitability of the site for allocation in the local plan as employment land. The baseline appraisal will be presented in a separate report. However in the interim, this preliminary advice note has been prepared to provide initial advice on the landscape sensitivity and capacity of the site; it comprises two parts; the first provides an evaluation of West Berkshire Council's 'Landscape Sensitivity and Capacity Assessment for: THE8 Land off Hoad Way, Theale (Liz Allen, September 2021); and the second sets out our findings in relation to the general suitability of the site, in landscape and visual terms, to accommodate employment development and the second part.
2. The advice note has been informed by a site visit by a chartered landscape architect from Turley Landscape and VIA and by a desktop review of relevant background documents.

Evaluation of 2021 West Berkshire Council Landscape Sensitivity and Capacity Assessment (WBC Assessment) for area THE8: Land off Hoad Way, Theale

3. The WBC Assessment was undertaken on behalf of the council by Liz Allen EPLA and was published in in September 2021. The methodology adopted for the assessment is provided within the report and uses a seven stage approach to assess the landscape sensitivity and value of the site and its capacity to accommodate future employment development. Commentary on the methodology is not provided as it is accepted that there is no standard approach for assessing landscape sensitivity and capacity. Instead, commentary is provided below on how the methodology has been applied for the Hoad Way site.

Stage 1: Visual Sensitivity

4. The WBC Assessment evaluates the visual sensitivity of Area THE8 as:

- General visibility sensitivity score: High
- Population sensitivity score: High
- Mitigation potential sensitivity score: High
- Overall visual sensitivity score: High

5. The above assessment scores place the site in the highest category of visual sensitivity which we consider overstates and inaccurately reflects the visual sensitivity of the site. According to the WBC methodology, areas of the highest visual sensitivity would be those with prominent landmarks, high visibility, providing important vistas or panoramas, affecting a large extent or range of key sensitive receptors, forming part of a valued or key view and where mitigation measures would not be feasible or would damage local character. In our opinion, using these criteria, the areas of highest visual sensitivity in the district are likely to be those of high scenic quality and recreational importance such as the AONB landscape which the Site does not form part of.
6. We consider that the Hoad Way site does not fall into the highest category of visual sensitivity and that a number of characteristics and factors are present which reduce the visual sensitivity of the site. These include:
- Partial enclosure of the site by belts of mature vegetation and hedgerows and existing buildings (the assessment inaccurately describes the site as 'visually prominent'); whilst there are some open views across the site, they are intermittent and from much of the surrounding roads the site is well enclosed which reduces the appreciation of its openness;
 - Absence of rights of way passing through the site or any public access to the site (the site is not an area of recreational importance) and there is limited visibility across the site from the public footpath to the north of the site due to the presence of a dense hedgerow;
 - Views across the site are primarily experienced by drivers on the roads around the edge of the site which are generally of lower sensitivity than users of recreational routes or public open spaces;
 - Few residential properties overlook the site (despite its proximity to the settlement edge). The closest properties to the Site are in commercial use or set back from the site by long gardens or roads. For most of the properties which do look across the site, trees are present between the site and the properties which provide partial filtering of views of the site, particularly in summer;
 - Absence of landmarks within the site which contribute to local visual amenity and the presence of some detracting elements including pylons and high voltage power line;
 - Visual and scenic quality of the site is not high and does not make an important contribution to the character or identity of Theale;
 - Site does not contribute to the local skyline (other than the electricity pylons which are detracting elements on the skyline);
 - Views across the site are not identified in published documents as being valued or key views. Views across the site from the roundabout junction with the motorway were only recently opened up when vegetation was removed to accommodate changes to the road junction (in c. 2016) (see image below illustrating previous planting preventing views across the site);
 - The site was previously more enclosed by vegetation (see below image) and perimeter belts of vegetation adjacent to the surrounding roads and enclosing other employment sites is an established feature of the area. There is therefore good potential for additional

planting to be introduced around the perimeter of the site as mitigation. This would reinstate previous planting and connect with existing planting either side;



Figure 01: Aerial photograph of the Site c. 2016 - illustrating previous continuous belt of planting around eastern and southern side of site (source: Google Earth Pro)

7. In light of the above, we consider that the site's visual sensitivity score for general visibility, population and mitigation potential is not the highest level of visual sensitivity. In our opinion the site's visual sensitivity for each of these is more accurately described as Medium and the overall visual sensitivity score should therefore be Medium.

Stage 2 - Landscape sensitivity

8. The WBC Assessment evaluates the landscape sensitivity of Area THE8 as:
 - Natural factors sensitivity score: Medium
 - Cultural factors sensitivity score: High
 - Perceptual features score: Medium
 - Overall landscape sensitivity score: Medium/High
9. The above assessment scores place the site in the second highest category of landscape sensitivity which we also consider overstates and inaccurately reflects the landscape sensitivity of the site. We consider that the following characteristics of the site mean that a lower score should have been allocated for each of the categories:
 - Absence of significant habitats or vegetation within the site (no ecological designations present)

- Lack of topographical features other than road embankments
- Simple landcover of ungrazed grassland provides little landscape interest
- Little evidence of historic landscape features or patterns or of time depth
- Absence of recreational use of site or any public access
- Although site is close to a conservation area it makes little contribution to the character or appearance of it
- Absence of any built form with cultural associations on the site
- Lack of social cultural associations with the site
- Generic boundary features (mainly established in association with adjacent highways)
- Character and tranquillity significantly influenced by adjacent roads and traffic and detracting elements such as the electricity pylons
- High level of existing lighting on all four roads which enclose the site and within the adjacent urban areas to the south, west and north-west

10. The site demonstrates few of the higher sensitivity characteristics for Natural Factors, Cultural Factors or Perceptual features and the sensitivity of each should therefore have been more accurately scored as Medium/Low. The overall landscape sensitivity score for the site should therefore be Medium/Low.

Stage 3 - Landscape Character Sensitivity

11. Using Matrix 3 of the methodology provided in the assessment, the WBC assessment evaluated area THE8 as being of High Landscape Character Sensitivity. However, using the above revised scores for visual sensitivity and landscape sensitivity, the Landscape Character Sensitivity of the site should be identified as being Medium/Low.

Stage 4 - Wider Sensitivity

12. The WBC assessment concluded that the Wider Sensitivity of the Site was Medium. In our opinion, the site does not meet all the criteria for Medium Wider Sensitivity (identified in para 1.14), most notably, the site cannot be said to have 'good physical and visual links to the wider landscape' since it is enclosed on three sides by major roads, and on the fourth side by a minor road, and partly enclosed by vegetation and buildings. This significantly reduce its connectivity with the wider countryside.
13. The WBC assessment also states that the eastern part of the site 'continues into the countryside of the North Wessex Downs AONB' but fails to acknowledge the presence of the M4 and associated embankments and planting which forms a major landscape barrier and obstructs connectivity of the countryside between the site and the AONB. In our opinion, despite forming part of its setting, the site has a weak relationship with the AONB landscape and does not make a positive contribution to the special qualities of the AONB.

14. However, it is agreed that the site is partly influenced by the existing settlement and adjacent employment uses and does share some of the characteristics of the wider landscape. Overall, the assessment of the area as being of Medium Wider Sensitivity is considered to be appropriate (albeit placed at the lowest end of this category).

Stage 5 - Overall Landscape Sensitivity

15. Using Matrix 4 of the methodology provided in the assessment, the WBC assessment evaluated area THE8 as being of Medium/High Landscape Character Sensitivity. However, using the above revised scores for Landscape Character Sensitivity and Wider Sensitivity, we consider that this should be Medium.

Stage 6 - Landscape Value

16. The WBC assessment identified the Site as being of Medium Landscape Value, due mainly to its role in forming part of the setting of the AONB and the Conservation Area. However, the assessment criteria for Landscape Value note that landscapes of Medium Value are typically areas of Regional Importance. In our opinion, the site does not constitute a landscape of regional importance or rarity and does not have a particularly special scenic value. Although it does form part of the setting of the AONB and the Conservation Area, it does not make a notable contribution to the character or special qualities of either of these and the presence of the M4 and perimeter planting reduces its influence.
17. Similarly, the WBC assessment places significant weight on the role of the site in separating Theale and Calcot but does not acknowledge that one of the principal factors in this sense of separation is the presence of the M4 corridor which lies beyond the site and forms a major barrier between the two settlements.
18. In our opinion, the site is an area of local landscape importance and of local quality and rarity and should therefore be considered as being of Medium/Low Landscape Value.

Stage 7 - Landscape Capacity

19. Using matrix 5 of its methodology, the WBC assessment concluded that site THE8 had a Medium/Low capacity to accommodate employment uses. The assessment concludes that the introduction of development on the site would create *'the perception of coalescence of Theale with Calcot and the loss of their separate settlement identities'*. However, in our opinion, with an appropriate layout and mitigation strategy in place, employment development could be accommodated on the site and a clear sense of settlement separation between Theale and Calcot could be maintained. The M4 corridor would continue to act as a major feature separating the two settlements and this could be reinforced with additional planting on the eastern side of the site.
20. For the reasons given above we consider that the sensitivity and value of the site has been overstated and the capacity of the site to accommodate employment development has been scored too low. On the basis of our own assessment, with an Overall Landscape Sensitivity of Medium and Landscape Value of Medium/Low, and using matrix 5, the landscape capacity of the site should be considered as Medium/High. We consider that the WBC definition of areas of Medium/High capacity as areas *'able to accommodate larger amounts of development for employment uses, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas. Certain landscape and visual features in the area may require protection'* is an appropriate reflection of the capacity of site THE8.

Conclusions

21. In conclusion, we consider that the WBC assessment has overstated the landscape sensitivity and value of the site, incorrectly evaluating it as an area of the highest visual sensitivity and second highest landscape sensitivity. Landscapes of this sensitivity would normally be of regional importance, of high scenic value and would have attributes which demonstrably contribute to its character and appearance. This is not the case for the site at Hoad way and the inaccurate analysis of the sensitivity of the site has resulted in an erroneous overall conclusion that the site (neither in whole or part) has capacity to accommodate any employment development.

Conclusions on suitability of the Site in Landscape and Visual Terms to Accommodate Employment Development

22. We have undertaken a baseline landscape and visual appraisal of the site and its context and carried out our own assessment of the capacity of the site to accommodate employment development using the council's methodology set out in the WBC assessment. In our opinion, the site has a Medium/High capacity to accommodate employment development. The key factors which have contributed to this judgement are:
- the relatively commonplace character and appearance of the site's landscape with few features of particular note and absence of any historic features;
 - the site is not covered by either a national or local landscape designation and is not considered to be an area of 'valued landscape';
 - although forming part of the setting of the AONB the site is separated from the main North Wessex Downs AONB landscape by the M4 corridor¹ and does not contribute to the identified special qualities of the AONB.
 - weak connection of the site with the wider countryside (including the AONB landscape) and strong containment of the site on three and a half sides by existing development and by an existing road network and associated belts of planting;
 - the proximity of the site to existing areas of employment and commercial land uses to the south and north-east, with large scale buildings and strategic planting belts, provides an appropriate character context for the introduction of employment development on the site. As a result, the introduction of large scale employment development on the site would not appear inappropriate or incongruent in this context;
 - existing presence of mature planting around much of the site provides some visual containment and enclosure and there is good potential for new structural planting to be introduced within and around the site. New planting could connect with existing planted

¹ A thin slither of landscape which falls within the boundary of the North Wessex Downs AONB is located c.10m to the north of the site. However the rest of the AONB lies c. 250 to the north and is separated from the site by the M4.

corridors around the site and mitigate potential landscape and visual effects of employment development;

- good accessibility and connectivity with the existing road network and potential for co-location with an existing area of employment land to the south (Arlington Business Park) and further existing employment land to the north-east;
- an absence of public access or rights of way across the site meaning the site is of low recreational importance; and,
- the site's flat landform, and lower position in relation to some of the adjacent roads is an appropriate topography for accommodating larger scale buildings for employment uses and minimising its impact on the surrounding area.

Summary and Conclusions

23. The Site comprises an area of rough grassland adjacent to the settlement edge of Theale. Existing employment and commercial land uses are located to the south and north-east of the site and the settlement of Theale lies to the west. The site is cut off from the wider countryside (including the AONB landscape to the north and north-east) by these areas of development and by the network of roads which encloses the site on all four sides. The site currently forms an open area of undeveloped land on the edge of the settlement and has no demonstrable attributes which elevate it above the ordinary in landscape or visual terms.
24. WBC's landscape consultant has prepared an assessment of the landscape sensitivity and capacity of the site to accommodate development and concluded that the site is of High Visual sensitivity, Medium/High Landscape Sensitivity, has a Medium/Low Landscape Capacity and that the site (either in whole or part) is not suitable for employment development.
25. Turley Landscape and VIA has undertaken our own landscape and visual assessment of the site and has reviewed the WBC assessment. We consider that in the WBC assessment both the Visual and Landscape Sensitivity of the site have been overstated and that the Landscape Capacity of the site has been undervalued. In our professional opinion we consider that the site is of Medium Visual Sensitivity, Medium/Low Landscape Sensitivity and has a Medium/High Landscape Capacity to accommodate future employment development.
26. The introduction of employment development on this site would result in harm to the character and appearance of the Site itself (as any employment development of green field sites would). However, the strong enclosure of the Site by existing roads, development and vegetation, the weak association of the site with the wider countryside and the association with other employment sites in the local context would mean that, (subject to an appropriate design and landscape strategy) development could be accommodated with few adverse landscape or visual effects beyond the Site itself. As a consequence, we consider that the site is an appropriate site for future employment development.
27. Recommended design principles for accommodating employment development on the Site and minimising potential landscape and visual impacts are to:
 - Focus principal development areas in the central and western parts of the site to maintain the separate identities of Theale and Calcot and step down heights of buildings in the

north-western corner (towards the conservation area) and the eastern side (towards the AONB);

- Create a strong landscape belt along northern edge of the site to form a green corridor, provide screening of the northern edge of development and form an enhanced edge to the adjacent footpath route between Theale and the AONB;
- Retain existing perimeter hedgerow and planting belts and reinforce with additional planting;
- Integrate tree planting within and around development areas to provide screening and visual enclosure to the site, increase local biodiversity and soften the appearance of proposed buildings;
- Incorporate pedestrian and cycle routes within site layout and connect with existing network of routes in the local area;
- Develop a colour palette for larger scale buildings which is appropriate to the local landscape context and is visually recessive;
- Avoid large glazed areas in building elevations facing towards the AONB to minimise potential for light spill;
- Minimise external lighting and ensure detailed design is undertaken in accordance with current best practice to ensure minimal light spill;
- Soften and screen car parking and goods yard areas with tree and hedgerow planting;

Contact

Joanna Ede



22 April 2022

FIRS3002

Appendix 3: Masterplan(s)



Site Plan - Option 2
1:1000

Area Schedule

Unit 1	
Warehouse:	47,660 sq.ft
Entrance/Lobby GF:	1,000 sq.ft
Mezzanine Offices:	4,000 sq.ft
Total GIA:	52,660 sq.ft
Dock Access	4
Level Access	3
Car Spaces	60
Net Site Area:	2.64 Acres

Unit 2	
Warehouse:	42,065 sq.ft
Entrance/Lobby GF:	1,000 sq.ft
Mezzanine Offices:	4,000 sq.ft
Total GIA:	47,065 sq.ft
Dock Access	3
Level Access	2
Car Spaces	60
Net Site Area:	2.38 Acres

Unit 3	
Warehouse:	40,480 sq.ft
Entrance/Lobby GF:	1,000 sq.ft
Mezzanine Offices:	4,000 sq.ft
Total GIA:	45,480 sq.ft
Level Access	3
Car Spaces	39
Net Site Area:	2.24 Acres

Total GIA 145,205 sq.ft
Redline Area 13.41Ac
Net Site Area 7.26Ac

Planning Site Area Schedule		
Name	Area (Hectares)	Area (Acres)
Demise Area Unit 1	1.95 hectare	4.82 acres
Demise Area Unit 2	1.25 hectare	3.09 acres
Demise Area Unit 3	1.77 hectare	4.39 acres
Net Dev Area Unit 1	1.07 hectare	2.64 acres
Net Dev Area Unit 2	0.96 hectare	2.38 acres
Net Dev Area Unit 3	0.91 hectare	2.24 acres
Road	0.45 hectare	1.1 acres
Site Gross Area	5.43 hectare	13.41 acres

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Theale,
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Drawing Name:
Site Plan - Option 2

Drawing Stage: Planning

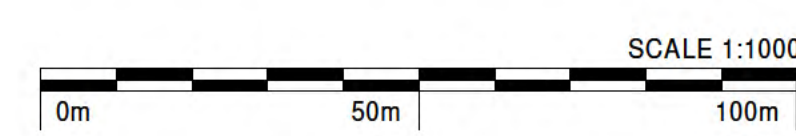
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SGP File Ref: 18-095-SGP-00002

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SGP Project No: Date: Drawn: Team: Scale: Rev:

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Area Schedule

Unit 1
 Warehouse: 47,660 sq.ft
 Entrance/Lobby GF: 1,000 sq.ft
 Mezzanine Offices: 4,000 sq.ft

Total GIA: 52,660 sq.ft
 Dock Access: 4
 Level Access: 3
 Car Spaces: 60
 Net Site Area: 2.64 Acres

Unit 2
 Warehouse: 45,590 sq.ft
 Entrance/Lobby GF: 1,000 sq.ft
 Mezzanine Offices: 4,000 sq.ft

Total GIA: 50,590 sq.ft
 Dock Access: 3
 Level Access: 2
 Car Spaces: 60
 Net Site Area: 2.56 Acres

Total GIA 103,250 sq.ft
 Redline Area 13.41Ac
 Net Site Area 5.20Ac

Planning Site Area Schedule		
Name	Area (Hectares)	Area (Acres)
Demise Area Unit 1	1.95 hectare	4.82 acres
Demise Area Unit 2	3.03 hectare	7.47 acres
Net Dev Area Unit 1	1.07 hectare	2.64 acres
Net Dev Area Unit 2	1.04 hectare	2.56 acres
Road	0.45 hectare	1.11 acres
Site Gross Area	5.43 hectare	13.41 acres

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Theale,
 Bath Road

Drawing Name:
 Site Plan - Option 3

Drawing Stage: Planning

Status: S3

SGP File Ref: 18-095-SGP-00003

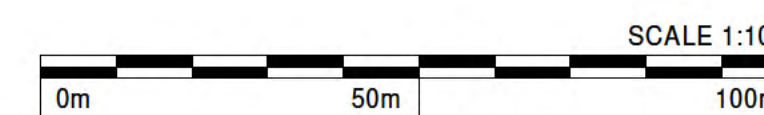
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SGP Project No: Date: Drawn: Team: Scale: Rev:

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