
Land at East Street, Reading

Sequential Test (Update)

June 2018

Land at East Street, Reading

**Sequential Test submitted on behalf of
Studios Construction (Reading) Ltd.**

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1.0 INTRODUCTION

- 1.1 This Sequential Test report has been prepared by Barton Willmore LLP on behalf of Studious Construction (Reading) Ltd. in support of a full planning application for purpose built student accommodation, comprising 103 bedrooms and associated facilities, on land at East Street, Reading (the site). The site is located to the west of East Street, as shown on the Site Plan (Ref: 3004 B) enclosed at **Appendix 1**, within the administrative boundaries of Reading Borough Council.
- 1.2 This report is an update to the original Sequential Test which was submitted in accordance with the National Planning Policy Framework 2012 (NPPF), to support a formal planning application (Ref:170019) to demonstrate that the requirements of the Sequential Test have been assessed in line with relevant criteria and subsequently passed by the proposed development. However, the aforementioned application was refused by Reading Borough Council on 7th June 2017, with reason for refusal 2 citing that the sequential test 'fails to demonstrate that there is no alternative location for such development'.
- 1.3 Our client has subsequently appealed this decision and with reference to this document, the Council's Statement of Case provides a greater understanding behind their rejection of the submitted sequential test and therefore the basis for reason for refusal 2. The Council's standing advice is that Sequential Tests should be conducted borough wide, however at paragraph 5.37 of the Council's Statement of Case it is conceded that *"...the whole borough may not be appropriate for student accommodation given the inter-relationship with the university campus"*. Notwithstanding this, the Council's Statement of Case concludes at paragraph 5.38 that *"...the LPA would contend that the search criteria for the Appellants sequential is unduly restrictive and has failed to fully examine the presence of alternative sites for student accommodation"*.
- 1.4 This updated sequential test therefore seeks to address this criticism and widen the search area, whilst still concluding that there are no suitable alternative sites for a new 103 bed student accommodation building.
- 1.5 This document is set out in accordance with the standing advice from the Department for Environment, Food & Rural Affairs and Environment Agency, entitled 'Flood risk assessment: the sequential test for applicants' April 2012 (as amended) and adopts the associated methodology.

2.0 SITE AND SURROUNDINGS

- 2.1 The site comprises 0.127 hectares (0.316 acres) of land immediately to the west of East Street, Reading. Currently the site is in vacant possession by our client, having formerly been used as a private car park. Further detailed information concerning the site has been provided within the submitted documentation accompanying the planning application, most notably the Planning Statement, and is therefore not repeated here.
- 2.2 Our client is experienced within the student accommodation sector and has a proven track record of building suitable and sustainable accommodation for students. Our client has also been awarded various awards and is a prominent student accommodation provider with an extensive countrywide portfolio based on sophisticated brand values and management support systems.
- 2.3 The necessity to provide a Sequential Test in relation to our client's land at East Street, Reading, relates to a very small portion of the site to the north being situated within Flood Zone 2; according to the Environment Agency's Flood Map for Planning. It should however be noted that the development footprint of the proposal does not fall within Flood Zone 2. Notwithstanding this, for the avoidance of doubt, our client's case is that no part of the site is in Flood Zone 2.

3.0 PRE-APPLICATION DISCUSSIONS

- 3.1 Initial pre-application advice received on 15th December 2016, confirms the Council's view on page 16:

"Part of the application site is located within Flood Zone 2. On this basis a Flood Risk Assessment will be required to be submitted, while the sequential test will also be required to be passed prior to the FRA being considered. Student halls, similar to residential development, are categorised as a 'more vulnerable' use. On this basis, an exception test will not be required."

- 3.2 The initial pre-application advice received also notes on page 16 that:

"Officers consider that the geographical basis for the consideration of your future sequential test should be the entirety of the borough (Reading Borough Council), taking into account (at the time of writing) as a starting point the sites allocated within the Reading Borough Council LDF Sites and Details Policies Document 2012 (Altered 2015) and the Reading Central Area Action Plan 2009. You are also advised to explore the sites which may come forward as part of the New Local Plan."

- 3.3 Notwithstanding the above, as noted during the introduction to this report, the Council have since revised their position and now concede that the 'whole borough' is not appropriate for considering sites suitable for student accommodation.
- 3.4 Our client engaged in significant pre-application discussions with the Council concerning the need to provide a sequential test, given the development footprint was not located within Flood Zone 2 (FZ2). Notwithstanding this, our client also noted to the Council that a very small portion of the site was located within FZ2, crucially according to broad and out-of-date evidence.
- 3.5 Correspondence was then undertaken with the Environment Agency concerning the need for a sequential test, as advised by the Council. However, the Environment Agency advised that as the development footprint was not within FZ2, they would not be required to comment on the application.

4.0 LOCAL AND NATIONAL POLICY GUIDANCE

- 4.1 Prior to undertaking the Sequential Test, we have reviewed the relevant national and local planning policy which we discuss below.

National Planning Policy Framework (March 2012) (NPPF)

- 4.2 The NPPF seeks to direct development away from areas at the highest risk of flooding, but where development is necessary, ensure a scheme is made safe without increasing flood risk elsewhere, as noted within paragraph 100.
- 4.3 The NPPF also takes into account the vulnerability of different types of development and advocates a risk based approach to determining the suitability of land for development in flood risk areas.
- 4.4 Accordingly, Local Planning Authorities and Development Plans are required to apply this risk based approach to the location of development by applying the Sequential Test and if necessary, the Exception Test.
- 4.5 The aim of the Sequential Test is to direct development to areas with the lowest probability of flooding. The NPPF states at paragraph 101 that development should not be permitted if there are “...***reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding***” (our emphasis).
- 4.6 Consequently it must be noted that the test is not simply whether another site exists, but rather whether any site(s) is a) reasonably available to the applicant as an alternative to the application site and, b) whether this site(s) is suitable for the particular development proposed.
- 4.7 The NPPF identifies the sequential approach as being ‘risk-based’ at paragraph 100, where risk is defined only after taking into account probability and consequence. The Environment Agency’s Flood Map for Planning is only an indication of ‘probability’ and the design of the proposal/characteristics of the site will ultimately determine the ‘consequence’.
- 4.8 It may be interpreted therefore that if the design/site characteristics make the occupants safe, then there is no consequence and by definition no risk according to the NPPF; resulting in the sequential test having been passed. Recent case law in this respect has determined the following:

“In determining the meaning of a policy statement and applying it, it is necessary to have regard to the underlying object and purpose of the policy. It is to be applied in a manner consistent with its purpose. This will sometimes require a measure of flexibility in interpretation.”

LJ Lloyd Jones (R v Tonbridge and Malling Borough Council 21/12/2005) paragraph 29.

- 4.9 Crucially, with the above in mind, we note that in relation to decision taking paragraph 187 of the NPPF advises the following:

*“Local planning authorities should **look for solutions rather than problems**, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should **work proactively with applicants** to secure developments that improve the economic social and environmental conditions of the area”* (our emphasis).

National Planning Practice Guidance (March 2014) (NPPG)

- 4.10 The NPPG complements the NPPF by providing guidance on how to implement its policies with regard, in this instance, to flooding. Paragraphs 2 and 3 set out the definition of flood risk, with paragraphs 18-22 providing detail in relation to the Sequential Test.
- 4.11 Paragraph 2 confirms that flood risk is a *“combination of the probability and the potential consequences of flooding from all sources”*. Paragraph 3 defines ‘areas at risk of flooding’ as *“...principally land within Flood Zones 2 and 3. It can also include an area within Flood Zone 1 which the Environment Agency has notified the local planning authority as having critical drainage problems”*.
- 4.12 Paragraph 18 confirms that the general approach to a Sequential Test *“...is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk”*.
- 4.13 ‘Flood Zones’ are defined within Table 1 of the NPPG (paragraph 65) which are replicated below; our client’s site sits within Flood Zones 1 and 2 (at worst and in part) only.

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)
Zone 2 Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)

4.14 'Flood risk vulnerability classifications' are defined within 'Table 2 of the NPPG (paragraph 66) which is enclosed at Appendix 2. Residential use is falls within the 'more vulnerable' classification and therefore applies to our client's site.

4.15 The NPPG then includes the flood risk vulnerability and flood zone compatibility comparison at Table 3 (paragraph 67) which is replicated below:

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓*

Key:

✓ Development is appropriate

X Development should not be permitted

- 4.16 The table above confirms that our clients proposed residential use ('more vulnerable') is appropriate within Flood Zones 1 and 2 and indeed that no Exception Test is required.

Reading Core Strategy 2008 (revised 2015)

- 4.17 Policy CS35 of the adopted Core Strategy deals with flooding and seeks to direct new development away from areas at high risk of flooding. However, the explanatory text to the policy (paragraph 11.20) is clear that:

"Appropriate weight will be given to the redevelopment of land at risk of flooding that provides significant regeneration benefits on previously developed land."

Strategic Flood Risk Assessment

- 4.18 A Strategic Flood Risk Assessment (SFRA) has been undertaken by Peter Brett Associates LLP on behalf of Reading Borough Council. Dated June 2017 the SFRA post-dates the application determination (7th June 2017) and therefore was not available for consideration during the original application submission. Notwithstanding this, we note the Council have made reference to this document within their Statement of Case and therefore we reference it within this amended Sequential Test.
- 4.19 The SFRA concludes the same as the Environment Agency with regard to Flood Zones as it uses their data. However, we also note that the SFRA maps historic flooding events within Reading Borough. Our client's site is within the 'Central Character Area' for the purposes of the SFRA. Firstly, the historic events of November 1974, August 1977 and January 2003 are shown on Map F2_C1, however our client's site remains unaffected. Secondly, the historic events of March 1947, December 2000 and Lower Caversham November 2012 are shown on Map F2_C2, however our client's site remains unaffected. Finally, the historic events of Shiplake July 2007, July 2007 and Thames 2013-2014, however our client's site remains unaffected.
- 4.20 It is considered that of all the historic flood event shown within the SFRA in relation to the 'Central Character Area', none demonstrates that our client's site has ever been subject to flooding.

Reading Housing and Economic Land Availability Assessment (November 2017) (HELAA)

- 4.21 The most recent version of the Council's HELAA was published in November 2017 and provides an up to date source of potential housing sites within the Borough. This document supersedes that used to inform the previous Sequential Test, however as it is again noted within the Council's Statement of Case, it is used and referenced within this updated Sequential Test. This document will form the basis of the Sequential Test for alternative sites. We note also that the HELAA includes our client's site which is subject to this appeal, the assessment of which we will explore in more detail later in this report.

5.0 METHODOLOGY

- 5.1 The aim of the Sequential Test is to direct development to areas with the lowest probability of flooding. The NPPF states that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.
- 5.2 The first step within the Sequential Test is therefore to determine the flood risk vulnerability of the proposed use and the Flood Zone of the site.
- 5.3 As our client's site is proposed for student accommodation (residential use) it is classified as 'more vulnerable' as discussed in section 4 of this report. Moreover, the majority of our client's site is located within Flood Zone 1 and only a very small portion of the site (if any) is located within Flood Zone 2. The NPPG confirms that this use is appropriate within Flood Zone 2 and that an exception test is not required, as detailed in section 4 of this report. The principle of development for the purposes of flood risk is therefore considered to be established.
- 5.4 The second step within the Sequential Test is specific to the sites intended use and relates to the search area deemed appropriate. We have already commented that Reading Borough Council's standing advice suggests Sequential Test's should conduct a borough wide search. However, we have also noted that within the Council's Statement of Case they concede that this would not be appropriate for Student Accommodation, given the proximity to the University.
- 5.5 We note that the Council's Statement of Case criticises the original criteria approach to the Sequential Test as 'unduly restrictive'. We have therefore removed all criteria previously used, however a search radius criteria will need to be employed, given it is agreed that the entire borough is not appropriate. In this regard we note that the Council's Statement of Case references a consented student accommodation use at 60-62 Friar Street, which is situated 1.6 miles from the University campus. We therefore consider it appropriate to extend our search radius to 1.6 miles from the centre of the University's Whiteknights Campus, as shown at **Appendix 3**.
- 5.6 Once a list of sites within the 1.6 mile search radius has been compiled, these sites will be looked at in more detail to determine whether they are reasonably available and appropriate for the proposed development, in line with paragraph 101 of the NPPF.

6.0 SEQUENTIAL TEST

- 6.1 The list of sites which are within the 1.6 mile search radius are shown in the table enclosed at **Appendix 4**. The table demonstrates that there are a total of 97 possible alternative sites within this search area. Further high level assessment was then undertaken in relation to whether these sites were directly comparable with the application site based on site area and yield. It is therefore logical to discount sites which are not comparable with the application site in this regard, as follows (please also refer to Appendix 4):
- 6.2 *Too large:* those sites which are more than double the size of our client's Site are considered unsuitable. Our client is aiming to deliver a bespoke product and has tailored their proposals to represent the land value of the application site. Although there is no appetite to double the size of the proposed scheme, it is conceivable for additional amenity elements to be added to the proposal, if a larger site was available. We have therefore been lenient in setting the upper size threshold to sites of not more than double our client's site area (0.13ha). A site greater than 0.26ha would be considered to be financially unviable, when compared to the proposed scheme and consequently not considered appropriate for the proposed development. Consequently such sites do not satisfy the test within paragraph 101 of the NPPF and, have been discounted and coloured yellow.
- 6.3 *Unavailable:* those sites which are not considered available do not satisfy the requirements within paragraph 101 of the NPPF. Consequently, sites which have been deemed 'potentially available' or 'not available' within the Council's HELAA, have been discounted and coloured grey.
- 6.4 *Too small:* those sites which are not considered large enough to accommodate the application proposal are considered unsuitable. Whilst the application site measures 0.13ha it is considered that sites as small as 0.1ha could possibly accommodate the proposals without insurmountable planning concerns. Consequently, those sites which are smaller than 0.1ha have been discounted and coloured orange.
- 6.5 *Flood Zone 2/3:* those sites which are within Flood Zone 2 and/or Flood Zone 3 are not considered to satisfy the purposes of the Sequential Test; namely to find an alternate site within Flood Zone 1. Therefore they have been discounted and coloured blue.
- 6.6 Following the above broad assessment of sites, from the list of 97 sites potentially available, 6 sites remain and have been subjected to more detailed assessment below.

KA006 - 40 Silver Street

- 6.7 We note that this site is currently subject to an extant permission for 14 flats (ref: 150885) and a more recent extant permission for 62 studio rooms (ref: 172118). We also note that an application has been submitted for prior notification of proposed demolition (ref: 180725). Consequently, notwithstanding the planning activity, it would appear from the recent prior approval notification that this site is under construction and is therefore not available. Based on this information we consider that it is appropriate not to evaluate this site further and deem it not sequentially preferable.

AB032 - 173-175 Friar Street

- 6.8 This site sits adjacent to 6 Grade II listed buildings. This in itself would make any planning application challenging, given the requirement to preserve heritage assets. Moreover there is an existing building on site, which would need demolishing in order to implement our clients proposed development. There are associated risks with demolition in the town centre, particularly in this instance where the building is joined to others and in very close proximity to listed buildings.
- 6.9 Given the planning obstacles above we consider that the site is not 'appropriate' nor viable for our client's proposed development and submit that this is clear justification for why the site is not sequentially preferable to our client's Site.

AB042 - 173-175 Kings Road

- 6.10 We note that the site is currently subject to an extant permission for 12 residential units to be converted from existing office use. In relation to this planning permission we also note that a number of conditions have been discharged to date. This would serve to demonstrate that the owners are no longer pursuing redevelopment options and are seeking to implement the extant permission, if they have not done so already. The site is therefore not considered reasonably available for development and is therefore not deemed sequentially preferable to our client's Site.

AB076 - 187-189 Kings Road

- 6.11 We note that this site has had an application refused for 150 student units (ref: 161205), which comprised 3 separate blocks in total. Whilst therefore relevant to our client's proposed development and sequentially preferable in terms of the site being located within Flood Zone 1, we note there are major planning concerns cited within the Reasons

for Refusal (RfR). RfR 1 notes that the 5-storey building to the rear "...would be detrimental to the setting of nearby listed buildings". Moreover, RfR 3 notes that even the proposed 2-storey front extension "...would be detrimental to the setting the neighbouring listed building".

- 6.12 In total there are 7 Reasons for Refusal which when considered collectively, appear insurmountable. Furthermore, although an extensive design review may be able to overcome some concerns, we would question whether the site could then achieve the proposed development. Our client could not implement their scheme in its entirety, given there are existing buildings on site and this would therefore require our client to split their offer across 3 building. Not only would this raise viability concerns, but we consider that the characteristics of the site do not deem the site 'appropriate for the proposed development'. Consequently this site fails the test associated with paragraph 101 of the NPPF and we consider that it is therefore not sequentially preferable to our client's Site.

79 London Road & 34 Eldon Terrace

- 6.13 We note that no. 79 London Road is a Listed Building (List UID: 1156000) and that there are at least two other large structures on this site. The site is therefore only suited to conversion (for the majority) rather than demolition. This instantly renders the site incomparable to our client's Site. Moreover, the site is very long and thin, and would therefore nevertheless not be appropriate for our client's proposed development. Accordingly we must find that this site is not sequentially preferable.

252 Kings Road

- 6.14 We note that this site has an extant planning permission for a 6 storey student accommodation building. Therefore whilst relevant to our client's proposed development and sequentially preferable in terms of being located within Flood Zone 1, we note that firstly the site is not vacant as is therefore not directly comparable to our client's site. Imperatively however, it is evident when viewing this site that the scheme has been implemented and we would suggest is also virtually complete. Therefore this site is not considered sequentially preferable to our client's Site.

7.0 OVERVIEW AND CONCLUSION

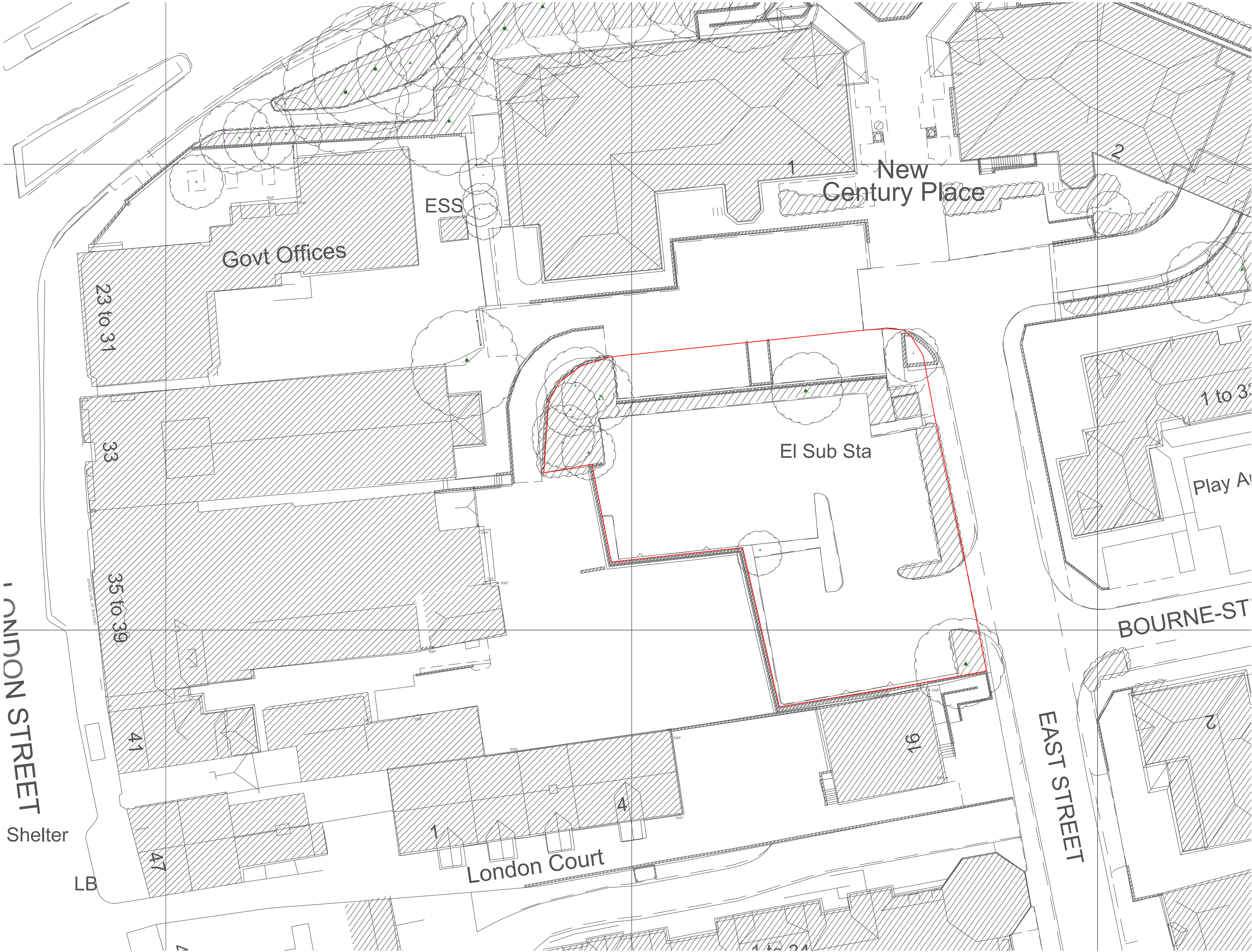
- 7.1 The application site is located within central Reading and affords excellent access to goods and services for future residents. Moreover, in line within its intended use, the site is within very close proximity to the University of Reading and is therefore considered entirely sustainable.
- 7.2 Nevertheless, according to the Environment Agency's Flood Map for Planning, a very small northern portion of the site appears to be situated in Flood Zone 2, with the remainder of the site in Flood Zone 1. This has necessitated the need for this Sequential Test.
- 7.3 Given the broad scale of the Environment Agency's Flood Map for Planning, and the fact that it appears to demonstrate only a small portion of the site to be within Flood Zone 2, our client instructed their flood risk consultants Clarkebond to investigate. The modelling demonstrated that the boundary for Flood Zone 2 was beyond the site boundary and therefore the whole site is in fact within Flood Zone 1. We are aware the Council has rejected this modelling and the associated report within their Statement of Case and accordingly, Clarkebond have prepared a rebuttal which clarifies some fundamental errors the Council have made. This rebuttal and Clarkebonds original report should therefore be read in conjunction with this Sequential Test.
- 7.4 Notwithstanding the above, we have prepared this Sequential Test to assess whether or not there are any sequentially preferable sites, as required by national policy. Indeed, as explained within the introduction of this report, following criticism that our previous Sequential Test was 'unduly restrictive', we have broadened the scope considerably.
- 7.5 This Sequential Test concludes that within a 1.6 mile radius of the University's Whiteknights campus there are no alternative sites within Flood Zone 1 which are 'reasonably available' and 'appropriate for the proposed development' in accordance with paragraph 101 of the NPPF.
- 7.6 We note the Council's comments at paragraph 5.39 of their Statement of Case, wherein it is suggested that there is 17ha of land 'potentially available' at the University's Whiteknights campus, for purpose built student accommodation. Having considered this, within the submission Local Plan under associated policy ER2, it is noted that the Development Plan for the campus (2008) has largely been built out "*...but there remains the likelihood for further development*". When applying paragraph 101 of the NPPF, consistent with the methodology of this assessment, we cannot conclude 'potentially available' land which, in the Council's opinion, has a 'likelihood for further development', passes the test of being 'reasonably available'. Indeed we have no further land parcel

information with which to draw an assessment and moreover, the campus is considered constrained in planning terms, which the University themselves note within their representations to the submission Local Plan.

7.7 Whilst we therefore, in principle, do not disagree that this land may facilitate new student accommodation in the future, there is currently a lack of information available pertaining to planning constraints, site size and land availability, and it cannot therefore reasonably be considered within this Sequential Test as an alternative site.

7.8 We therefore conclude that our client's site and the proposal meets the Sequential Test as required.

APPENDIX 1



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i) All architects, structural and service engineer's drawings and specifications.
ii) All CDM information including designers risk assessments.



APPLICATION SITE BOUNDARY

B	PLANNING APPLICATION ISSUE	P	2017.01.02	MB	-		
A	PRE APPLICATION ISSUE	P	2016.11.07	MB	-		
-	PRE APPLICATION ISSUE	P	2016.10.18	MB	-		
revision	notes	status	date	author	reviewer		

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Drawing SITE EXISTING
Site Plan

Scale 1:200	Job no. 16033	dwg no. 3004	Rev : B
at size A1	Status Preliminary		

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16033 3004
EXISTING SITE PLAN
1:200

APPENDIX 2

Table 2: Flood risk vulnerability classification**Essential infrastructure**

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.
- Wind turbines.

Highly vulnerable

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure').

More vulnerable

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill* and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

Less vulnerable

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).

- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.

Water-compatible development

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

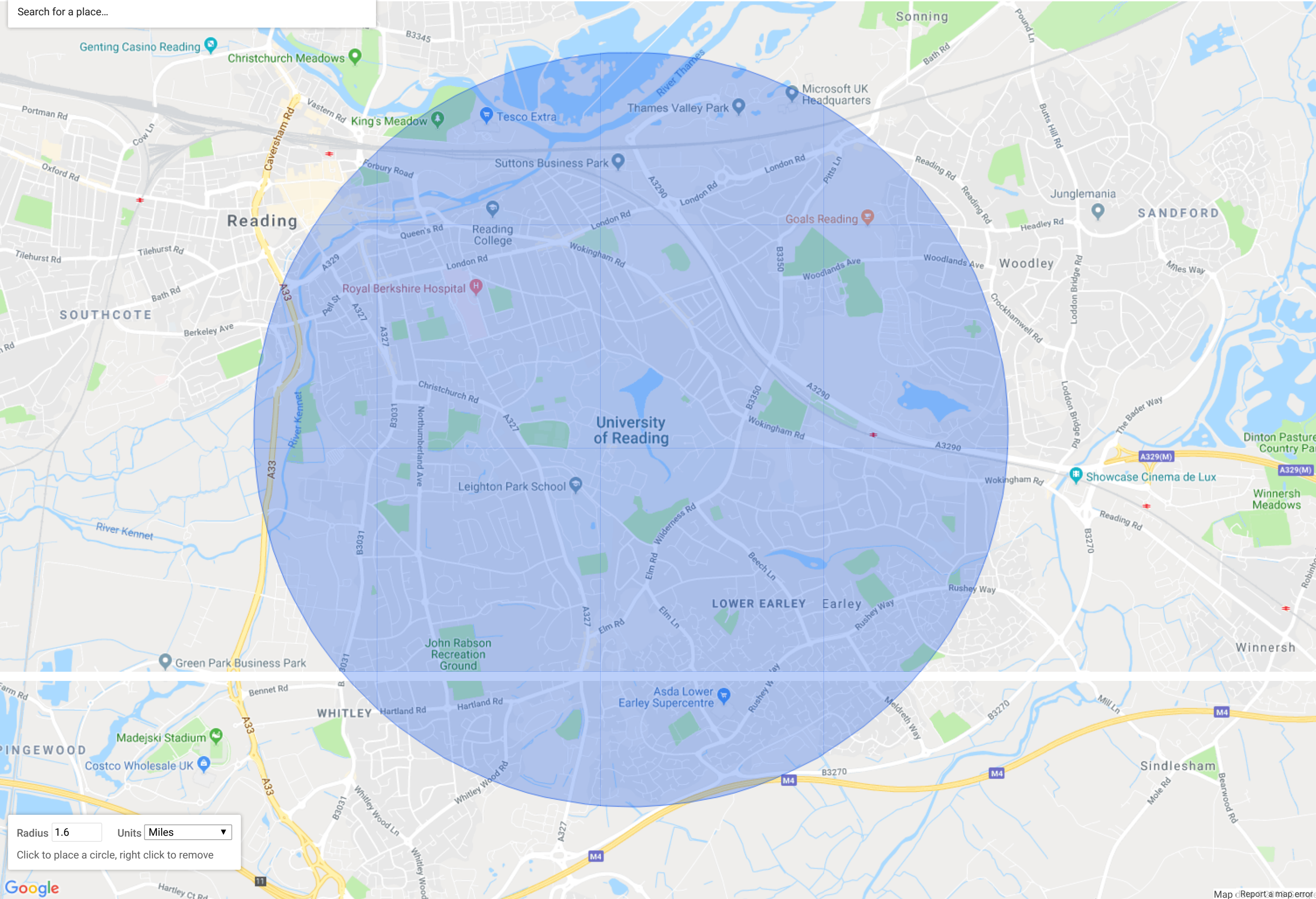
” * “ Landfill is as defined in [Schedule 10 of the Environmental Permitting \(England and Wales\) Regulations 2010](#).

Paragraph: 066 Reference ID: 7-066-20140306

Revision date: 06 03 2014

APPENDIX 3

Search for a place...



Radius Units

Click to place a circle, right click to remove

APPENDIX 4

HELAA reference	Location	Size	Capacity	comment
CH001	UoR, The Chancellors Way & Shinfield Road	3	0	too large
CH002	Reading Girl's School, Northumberland Ave	0.98	0	too large
CH004	Leighton Park School, Shinfield Road	0.5	0	too large
CH005				not available
CH006	St Patricks Hall, Northcourt Ave	3.39	107	too large
WH003				not available
WH015				not available
WH016	Kennet Island Phase 3, Manor Farm Road	5.46	272	too large
WH048				not available
KA001				not available
KA002	Corner of Crown St and Southampton St	0.08	14	too small
KA003	Corner of Crown St and Silver St	0.38	76	too large
KA004				not available
KA005				not available
KA006	40 Silver Street	0.11	13	
KA007	34-36 Crown St	0.034	14	too small
KA008				not available
KA009				not available
KA010				not available
KA011	The Woodley Arms PH, Waldeck Street	0.088	29	too small
KA013				not available
KA014				not available
KA015				not available
KA016				not available
KA017				not available
KA018				not available
KA019				not available
KA020				not available
KA021				not available
KA022				not available
KA023				not available
KA024				not available
KA025				not available
KA026				not available
KA027				not available
KA028				not available
KA030				not available
KA031				not available
KA032				not available
KA033				not available
MI002	Lok n Store, 5-9 Berkeley Avenue	0.63	112	too large
MI004	21 Rose Kiln Lane	0.56	0	too large
MI005				not available
MI010				not available
MI013				not available
MI014				not available
MI015				not available
MI017				not available
AB013	Reading Prison	1.44	72	too large
AB014	Forbury Retail Park	6.99	980	too large
AB015	Forbury Business Park	2.89	140	too large
AB016	Gas Holder	0.71	46	too large
AB021				not available
AB022				not available
AB024				not available
AB025				not available
AB026				not available
AB027				not available
AB031	Energis House, Forbury Road	1.4	20019 sq.m	too large
AB032	173-175 Friar Street	0.14	14	
AB033	84 Watlington Street	0.07	10	too small
AB036				FZ 2+
AB039	Jacksons Corner	0.98	26	too large
AB041				FZ 2+
AB042	173-175 Kings Road	0.12	15	

ABO43				FZ 2+
AB044	Kings Lodge, 194 Kings Road	0.06	18	too small
AB049				not available
AB052	The Oracle Shopping Centre, Yield Hall Place	0.04	0	too small
AB053	27-32 Market Place	0.04	14	too small
AB056	Former Gas Works Building, Gas Works Road	0.064	18	too small
AB062				not available
AB066				not available
AB076	187-189 Kings Road	0.1	22	
AB082				not available
AB095				FZ 2+
AB098				FZ 2+
AB099				FZ 2+
RE001	Royal Berkshire Hospital, London Rd	0.47	0	too large
RE002	Wells Hall, Upper Redlands Rd	2.07	17	too large
RE006	University of Reading, London Road	0.45	53	too large
RE007	79 London Rd and 34 Eldon Terrace	0.12	6	
RE008	252 Kings Rd	0.18	32	
RE009				not available
RE011				not available
RE012				not available
RE014				not available
RE015	Land adjacent to 40 Redlands Road	0.43	26	too large
RE016	Dingley House, 3-5 Craven Road	0.33	17	too large
RE017				not available
RE018				not available
RE019				not available
PA001				not available
PA002				not available
PA004				not available
PA005				not available
PA006				not available