

PROPOSED EXTENSION OF EXISTING BUILDING TO PROVIDE UP TO 50 NEW RESIDENTIAL DWELLINGS

FLOOD RISK SEQUENTIAL TEST

CLARENDON HOUSE, QUEEN'S ROAD, READING

ON BEHALF OF ALLIES GROUP

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1. INTRODUCTION

- 1.1.1 Pegasus Group has been instructed by Allies Group to undertake a Flood Risk Sequential Test to support a planning application for a proposed extension of the existing building to provide up to 50 residential units at Clarendon House, Queen's Road, Reading.
- 1.1.2 In support of this application Cannon Consulting Engineers (Cannon) has prepared a Flood Risk Assessment (FRA) which confirms that the site is located within Flood Zone 2.
- 1.1.3 Residential use developments are classified as 'More Vulnerable'. This type of development is considered appropriate within Flood Zones 1 and 2 but where the land is identified as Flood Zone 2 a sequential test is required in order to confirm that development is directed towards areas of lowest risk from flooding.
- 1.1.4 This report is therefore submitted to support the planning application and to accompany the Flood Risk Assessment. This document does not repeat the FRA which should be read in conjunction with this document.
- 1.1.5 This Sequential Test has been prepared in line with National Planning Policy Framework (NPPF); the Planning Practice Guidance (PPG); and following discussions with the case officer at Reading Borough Council.
- 1.1.6 This report provides the Sequential Test for the site compared to alternative sites in the district, confirming that there are not sequentially preferable locations available to meet development needs in the district.

1.2 Site Context and Proposed Development

The application site, Clarendon House 59-75 Queens Road, lies within the defined central area of Reading, to the south and east of the retail, office and central cores. It is some 0.22ha in size and is surrounded predominantly by flatted residential development. Other surrounding uses include offices, a church and a public house. A Site Location Plan is attached at Appendix 1.

APPENDIX 1: SITE LOCATION PLAN

- 1.2.1 The application scheme for the site proposes:

"The erection of a one storey roof extension and a part six, part ten storey building, mews houses comprising 4,108 sqm (GEA) of new development, providing up to 50 residential units together with associated services enclosures, parking and landscaping."

- 1.2.2 Clarendon House is a vacant building and, as such, is immediately available for development delivering residential units in the 0-5 year period.

2. POLICY CONTEXT

2.1.1 Pegasus has prepared this Sequential Test in accordance with relevant national and local planning policy and guidance as set in this section.

2.2 National Planning Policy Framework

2.2.1 The NPPF, at paragraph 101, sets out the aim of the Sequential Test which *"is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding."*

2.3 Planning Practice Guidance (PPG)

Sequential Test

2.3.1 PPG states that a Sequential Test needs to be undertaken if a development is in flood zone 2 or 3 and the geographical search area should be confirmed in discussions with the local planning authority.

2.3.2 PPG sets out method for undertaking a Sequential Test for any planning application. The method is set out below.

2.3.3 The information required within a Sequential Test, as set out below:

- site name and address;
- whether the site has been allocated in the local plan (i.e. identified for a specific use like housing);
- any issues that would prevent development on the site (e.g. roads that are too small) and whether these issues could be overcome; and
- your estimate of its approximate capacity.

2.3.4 It also requests the following information:

- the status of the local plan (e.g. whether it's been adopted or is in draft); and
- supporting documentation about your alternative sites, e.g. the local plan background and

- evidence base documents or housing and economic land availability assessments.

2.3.5 The Guidance sets out how to compare the risk of flooding of the proposed site with alternative sites, using the following resources:

- an Environment Agency flood map;
- a strategic flood risk assessment for the local authority area;
- existing flood risk assessments on the sites; and
- any other source of flooding information.

2.3.6 The Sequential Test needs to conclude if any alternative sites have a lower risk of flooding than the proposed site.

Exceptions Test

2.3.7 Table 2 of the PPG sets out the flood risk vulnerability classification. Residential development is classed as 'More Vulnerable'.

2.3.8 Table 3 of the PPG sets out when the Exception Test is required. It confirms that for 'More Vulnerable' uses in Flood Zone 2 an Exception Test is not required to be undertaken.

2.4 The Development Plan

2.4.1 Reading Borough Council (RBC) have three adopted development plan documents, namely the Core Strategy (adopted 2008 and altered in 2015) Reading Central Area Action Plan (adopted 2009) and Sites and Detailed Policies Development Plan Document (DPD) (adopted 2012 and altered in 2015).

Draft Local Plan

2.4.2 However, RBC are currently preparing a revised Local Plan which was submitted to the Secretary of State for examination in March 2018. As part of the review process, the Council has been identifying potential development sites capable of delivering development in order to meet the identified needs of the Borough, and housing in particular.

2.4.3 The Housing and Economic Land Availability Assessment (HELAA) published in November 2017, and the Sequential and Exception Test of the sites in the Pre-Submission Draft Local Plan published in December 2017 provide lists of all the identified potential development sites in the Borough. Section 4 of the

Sequential and Exception Test document confirms that RBC is unable to meet its full needs for development in Flood Zone 1 locations and use of sites in higher flood risk zones will be required. It states at paragraph 4.3 that *"after these 100% Flood Zone 1 sites are taken into consideration, there clearly remain very significant levels of development need that cannot be met – around two thirds of the remaining housing need, an actual increase in the office need and the vast majority of the industrial and warehousing and retail need."*

- 2.4.4 The Sequential and Exception Test document goes on to carry out a sequential test on a series of sites located in Flood Zones 2 and 3. It confirms that they pass the sequential test as identified development needs cannot be accommodated on sequentially preferable sites, and that there are opportunities within the development to both reduce and minimise flood risk on site.
- 2.4.5 It is considered that the same conclusion can be drawn about the proposed development at Clarendon House. The vacant office building itself already benefits from Prior Approval for the change of use from Class B1 office use to Class C3 residential use providing 49 units (application ref: 180156). The Flood Risk Assessment (FRA) submitted with and approved as part of the application confirms that the site is considered to be at low risk of flooding from all sources assessed and is therefore considered to be safe from a flood risk perspective.
- 2.4.6 The FRA prepared in support of the current scheme proposals also concludes:
- The site lies in Flood Zone 2 on EA mapping and is not shown to be affected by the 1 in 100 annual probability flood including the maximum recommended climate change allowance of 70%
 - The site is not considered to be subject to significant or unmanageable flooding from the other sources identified in the Flood and Water Management Act 2010 (FWMA)
 - Minimum floor levels will be set at or above 38.16m AOD, 800mm above the modelled 1 in 100 annual probability flood level.
 - The site will incorporate green/brown roofs and green space which will help reduce the existing extent of impermeable cover, improve runoff quality and help manage volume during smaller storm events.
 - Surface water runoff will (if possible) incorporate an element of disposal via infiltration and/or discharge to the Thames Water surface water sewer network (as is understood to currently be the case).

- In the light of the above, it is considered that RBC should be maximising the potential of sites such as Clarendon House which are located within Flood Zone 2, but are considered safe in terms of flood risk, in order to deliver the development needs of the Borough which, for the most part, cannot be delivered in Flood Zone 1.

3. SEQUENTIAL TEST

- 3.1.1 Irrespective of the fact that RBC is having to propose sites in Flood Zone 2 for allocation in order to deliver enough sites to meet the needs of the Borough, in particular the housing needs, planning policy still requires that the Sequential Test is carried out for proposed development at Clarendon House as it is located in Flood Zone 2.
- 3.1.2 The PPG states that the flood risk Sequential Test does not need to be applied to applications for a change of use. As such, this assessment only applies to the additional built development proposals – some 46 residential units - and not to the 49 units granted by the previous Prior Approval consent.
- 3.1.3 However, it is considered that the Sequential Test should actually not also be required for the development now currently proposed as it forms an extension to the existing building and cannot therefore be located anywhere else.
- 3.1.4 The PPG states that “When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken. For example, in considering planning applications for extensions to existing business premises it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere.” (Paragraph: 033 Reference ID: 7-033-20140306)
- 3.1.5 Nevertheless, for completeness an assessment of other reasonably available, sequentially preferable sites has been undertaken.

3.2 Methodology

- 3.2.1 Our approach to the Flood Risk Sequential Test includes three tasks:
 - 1) Identifying the alternative sites to be tested;
 - 2) Identifying which Flood Zone the alternative sites are located; and
 - 3) Undertaking a desk-based assessment of the alternative sites.

3.3 Task 1 – Alternative Sites

- 3.3.1 The first task for the assessment is to identify the alternative sites to be tested. To do this, we have utilised RBC's evidence base documents which inform the

new Draft Local Plan, specifically the HELAA, and the Sequential and Exception Test. Both documents provide a list of all identified potential development sites.

3.3.2 This list clearly includes an extensive number of sites. However, we would suggest that for a site to be a realistic alternative to the application site, it would have to be similar in size, capacity and character to the proposed development. This approach has been accepted by other local authorities where we have undertaken Flood Risk Sequential Tests. Therefore, we consider it appropriate to only consider development sites which meet the following criteria:

- Flatted development sites located in the town centre; AND
- Sites which are between 1 and 3 ha (up to 50% smaller/larger than the proposed site of approximately 2 ha); AND
- Sites which can accommodate 25 to 75 units (up to 50% smaller/larger than the current proposed development).

3.3.3 If all three of these search criteria are not satisfied, then it is likely that a different character of development would result e.g. a much larger site with the same number of units would result in a much lower density development primarily provided houses, most likely located outside of the town centre, and would therefore not be a reasonable alternative site.

Consultation with RBC

3.3.4 However, we have consulted with RBC as to the parameters which should be used for the assessment and they consider that alternatives should be used, as follows:

- Sites located Borough-wide (not just in the town centre);
- Sites which are between 1 and 3 ha; OR
- Sites which can accommodate 10 to 75 units (on the assumption that the same number of units can be provided over a number of sites).

3.3.5 In our opinion, these criteria produce a number of sites/developments which would be significantly different to the proposed development scheme at Clarendon House and therefore cannot be considered as reasonable alternatives. This is particularly the case if a number of smaller sites which, when combined, provide the same number of dwellings as the scheme proposals; the character of development would be dramatically different.

- 3.3.6 In addition, considering the position that RBC are currently faced with in not being able to meet their development needs on sites in Flood Zone 1, it is not appropriate to suggest that a number of smaller sites should be taken up with providing a similar level of development proposed by the application scheme – the scheme would provide additional housing over that already identified.
- 3.3.7 Nevertheless, for completeness, we have used the parameters set by the Council.
- 3.3.8 In considering the sites that are included in the HELAA and Sequential and Exception Test document that fall within the parameters set by RBC, we have excluded from the assessment those sites that RBC have already concluded to be unsuitable, unavailable or unachievable. We have also excluded all sites that are proposed to be developed for non-residential uses.

Local Agents

- 3.3.9 In addition to the above, we have also contacted a total of 15 local agents via email to establish whether there were any additional sites which they were aware of that would need to be included in the assessment. The agents included: Romans, Parkers, Whiteknights, Winkworth, Savills and Martin & Co.
- 3.3.10 However, none on the responses received from the agents provided any new sites, within the defined parameters, to be assessed.

3.4 Task 2 – Flood Zone

- 3.4.1 The next task is to establish whether the identified alternative sites are sequentially preferable to the application site which is located in Flood Zone 2 i.e. located within Flood Zone 1.
- 3.4.2 RBC's Sequential and Exception Test document (December 2017) provides a breakdown of the flood zone locations of all the potential development sites in the Borough. This assessment has therefore utilised this document and have assessed all sites located either entirely or largely (over 50% of the site) within Flood Zone 1.

3.5 Task 3 – Assessment of Alternatives

- 3.5.1 In undertaking the first two tasks, this has provided a list of some 47 sites for assessment. The assessment of alternatives has been undertaken as a desk-

based assessment exercise based on publicly available information. It has considered the following in order to establish whether the alternative site is reasonably available:

- When is the site available for development?
- Is the site currently occupied/in use?
- Can the owner be identified or are there multiple ownerships?
- Has there been any planning activity (a review of the planning history)?
- Is the site being pursued by other third parties?
- Are there any known development constraints?
- Where is the site located (town centre or urban/suburban location)?

3.5.2 The schedule of sites considered, together with our assessment of whether they represent reasonably available alternative sites, is attached at Appendix 2.

APPENDIX 2: ASSESSMENT OF ALTERNATIVE SITES

3.6 Results of the Assessment

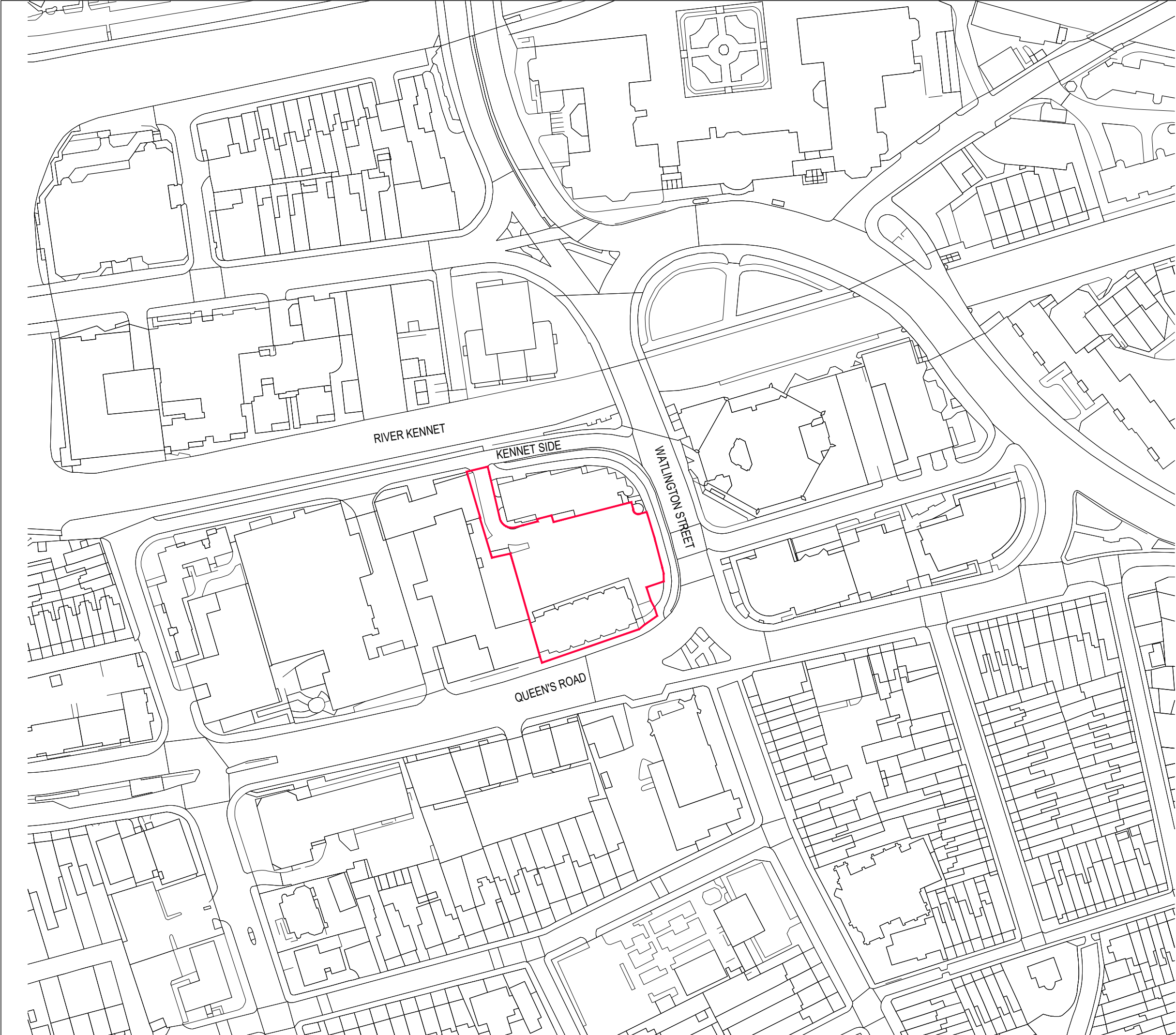
3.6.1 Having undertaken Tasks 1 and 2 above, the Sequential Test assessment completed for the proposed residential development at Clarendon House has considered some 47 sites. None of the sites assessed are considered to represent reasonably available, sequentially preferable, alternative sites. As such, the sequential test has been passed in this case.

4. SUMMARY AND CONCLUSION

- 4.1.1 Pegasus Group has been instructed by Allies Group to undertake a Flood Risk Sequential Test to support a planning application for a proposed extension of the existing building to provide up to 50 residential units at Clarendon House, Queen's Road, Reading, through extensions to the existing building.
- 4.1.2 Residential use developments are classified as 'More Vulnerable'. This type of development is considered appropriate within Flood Zones 1 and 2 but where the land is identified as Flood Zone 2 a sequential test is required in order to confirm that development is directed towards areas of lowest risk from flooding.
- 4.1.3 This Sequential Test has been prepared in line with National Planning Policy Framework (NPPF); the Planning Practice Guidance (PPG); and following discussions with the case officer at Reading Borough Council.
- 4.1.4 The Sequential Test assessment undertaken for the proposed residential development at Clarendon House has considered some 47 sites. None of the sites assessed are considered to represent reasonably available, sequentially preferable, alternative sites. As such, the sequential test has been passed in this case.
- 4.1.5 RBC has confirmed in its evidence base to support the new Draft Local Plan that it cannot meet the need of the Borough in full through available sites within Flood Zone 1. Therefore, it is considered that RBC should be maximising the potential of sites such as Clarendon house which are located within Flood Zone 2, but are considered safe in terms of flood risk, in order to deliver the development needs of the Borough.

APPENDIX 1

Site Location Plan



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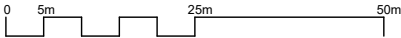
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APPENDIX 2

Assessment of Alternative Sites

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
AB001	Friar Street and Station Road, Reading (remaining)	1.36	67	The proposal is not directly comparable as the site is proposed for a mixed-use development (leisure, retail, residential and offices)	N
AB002	Friars Walk and Greyfriars Road (reduced site)	0.37	77	The proposal is not directly comparable, as the site is proposed for a mixed-use development (A1-5, B1a or D2 gym use). The site is only listed as being 'potentially available' or 'potentially achievable' in the HELAA, so no guarantee the site is deliverable.	N
AB017	108-116 Oxford Road, 10 Eaton Place and 115-125 Chatham Street	1.12	186	The site is only listed as being 'potentially available' or 'potentially achievable' in the HELAA, so no guarantee that the site is deliverable. It is also allocated in the draft Local Plan for residential and a community use. The proposed scheme only provides for residential use and therefore would not be suitable in this location.	N
AB019	Former Reading Family Centre, North Street	0.23	17	The suburban location of the site is unlikely to be suitable for the high density, flatted development of the proposed scheme. It is therefore not a comparable site.	N
AB022	3-10 Market Place, Abbey Hall & Abbey Square	0.29		The HELAA states that the site is not developable within the next 15 years. It is therefore not comparable to the scheme site which can be delivered within 5 years.	
AB032	173-175 Friar Street	0.14	34	The site has planning permission and is therefore being pursued by a third party. It would not be available for development.	N
AB039	Jackson Corner 1-9 Kings Road	0.98	29	The site is identified in the HELAA as being suitable for mixed use retaining retail on the ground floor. The site is only identified as being potentially suitable in the HELAA. The site has a recent permission and a current application suggesting it will not be available.	N
AB049	Princes House, 73a London Road	0.16	26	Already has prior approval, it is not known if there are any legal issues. Only described as being potentially available within the HELAA and only potentially achievable.	N

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
AB057	Central Swimming Pool, Battle Street	0.55	97	The site is identified in the HELAA as only being suitable once a new temporary provision is found for the swimming pool, only potentially suitable. The swimming pool is still in use. It is therefore assumed to be unavailable and unsuitable.	N
AB061	17-23 Queen Victoria street	0.05	13	Lapsed permission of an office to 13 flats. The building is listed and therefore a clear constraint to development. It would not be suitable to accommodate the scheme proposals.	N
AB062	1-5 King Street	0.08	20	Most of the building is listed so conversion is only likely to be suitable, and therefore the scheme proposals would be unlikely to be appropriate. Also stated in the HELAA as potentially available.	N
AB067	Brunel Arcade, Station Approach	0.58	172	Within the station area framework, the site is shown with a benchmark height of 6 storey and also for a local landmark, development to be provided as a mixed use development with retail and office space. The scheme proposals as a residential only scheme would be unsuitable.	N
AB076	187-189 Kings Road	0.1	27	Building is listed and therefore the high density flatted development of the proposed scheme is unlikely to be suitable. Pre-app suggested 27 student flats could be contained. Application for conversion refused in 2017, but demonstrates that the site is being pursued by a third part and is unavailable	N
AB094	160-163 Friar Street	0.06	28	Outstanding planning permission via prior approval, assumed that this will be developed and therefore unavailable.	N

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
BA002	Rear of 303-315 Oxford Road	0.22	17	Identified in the HELAA as being only potentially available for development so no guarantee that the site is available to deliver housing, located outside of the town centre near to Reading West which is characterised by 2 storey houses so likely to deliver a different type of development to the proposed scheme	N
KA002	Corner of Crown Street and Southampton Street	0.08	14	Site is located outside of the town centre, is a rebuild of an industrial building. The character of the area is of 2/3 storey terraced housing so a flatted development as proposed by the scheme <u>would potentially be inappropriate</u>	N
KA006	40 Silver Street	0.11	13	Planning permission was refused for a 3 storey building in 2017. This is an out of town location, surrounded by low level flatted development. The scale and type of development of the proposed scheme would be inappropriate for this location.	N
KA009	272-274 Elgar Road South	0.41	33	Only potentially available, there has not been any recent contact with the landowners , potentially achievable only as part of a wider release. The site is currently occupied for industrial use of which part should be retained. Overall is only potentially suitable. There is therefore no guarantee that the site is deliverable and certainly not for type of development of the proposed <u>scheme</u>	N
KA010	79 Silver Street	0.098	14	Retail use and currently occupied. Only described as being potentially available and potentially achievable. Permission gained for a rebuild to provide student accommodation with mixed use in 2018. This is also not in a town centre <u>location. Site is therefore not available.</u>	N

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
KA011	The Woodley Arms Public House	0.088	40	Located in a residential area outside of the town centre and therefore the density and character of the site would not be comparable . An application was refused in 2018 for 38 student units. This suggests the out of town centre location is inappropriate for a higher density flatted development and therefore would be inappropriate for the proposed development.	N
KA034	9 Southern Court, South Street	0.04	16	Currently occupied, part of the site potentially subject to contamination. Prior approval has been granted and is assumed to be developed within the timeframe of the permission. It is assumed <u>this site will be therefore unavailable.</u>	N
KE008	Allotments and adjacent land, Kentwood Hill	6.68	46	This is a suburban site and it therefore not comparable to the town centre site of the proposed scheme, this would also require a new build so is not a comparable form of development to the conversion and extension proposed, development is likely to mostly houses rather than high density flatted development as <u>proposed</u>	N
KE018	816 Oxford Road	0.23	19	Potential contamination identified which would require remediation, located outside of town centre and therefore a different character of development would likely be required. This site is not considered suitable or achievable for the <u>scheme proposals.</u>	N
KE019	Norcot Community Centre	0.13	17	Site is currently occupied. It is assumed that the community use will either have to be retained with residential above or relocated. It is therefore not a comparable development nor is it currently available.	N

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
M1008	Government Offices, Coley Park	1.89	71	The site is outside of the town centre and therefore not likely to be suitable for a comparable scheme to that of the proposals. Planning permission is being built out for 71 dwellings. therefore not available.	N
NO005	St Georges Hall, St Georges Road	0.31	12	Already has planning permission, with a housing association on board. Currently occupied as a community hall and not appropriate form for a change of use, outside of the town centre so not comparable. Site is not available or suitable for the development proposals.	N
NO009	103 Dee Road	0.85	42	Located outside of town centre and therefore not a comparable site, currently occupied and therefore not assumed to be available, issues over the reprovision of the fire station on site or elsewhere.	N
PA006	Alexander House, Kings Road	0.16	56	Identified in the HELAA for a mixed use development so is therefore not comparable to the scheme proposals. An application has been permitted for a mixed use office and residential scheme so being pursued by a third party and therefore not available.	N
PA008	Hamilton Centre, Bulsmershe Road	0.35	16	The Hamilton Centre is understood to be in use and therefore the existing community use would either have to be relocated or retained. The site is therefore not currently available. The suburban location of the site is unlikely to be suitable for the high density, flatted development of the proposed scheme. It is therefore not a comparable site.	
PE001	Land at Lowfield Road	0.93	43	The site is in a suburban location and therefore not comparable. The site also has a medium to long term development timescale identified in the HELAA so is therefore potentially not currently available or achievable.	N

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
PE003	Rear of 200-114 Henley Road, 12-24 All Hallows Road, 4, 5, 7, 8 Copse Avenue	0.87	40	The site is identified as being only potentially available- it is suspected that there are a number of different ownerships given the number of properties covered - and only potentially achievable, so there is no guarantee that the site is deliverable for development. The site is also suburban and therefore not comparable and would most likely require a different form of development than the high density flat development proposed by the scheme proposals.	N
AB055	Former Cox and Wyman Site, Cardiff Road	1.31	89	Planning application has been submitted for redevelopment of the site. This shows that the site is being pursued by a third party and is therefore not available. Also the scheme proposes houses and low-rise flats in a more sub-urban location. The scheme proposals for high density flat development would not be appropriate in this location.	N
AB016	Gas Holder	0.71	58	This is not yet decommissioned and potentially contaminated. There are uncertainties over the timescales therefore it is not clear if this site is available in the short term. The site is additionally outside of the town centre and therefore not directly comparable - a different form of development would most likely be required.	N
AB011	Broad Street Mall	2.75	250	There is a need to retain the retail space on the ground floor, resulting in a mixed use development. The site is not comparable to the scheme proposals.	N
CA003	St Martin's Precinct, Church Street	1.71	36	Planning Permission (140997) has been granted, and work has begun on a mixed use development of residential, commercial and retail uses. The site is therefore not a reasonably available alternative.	N

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
KA033	Car Park, East Street	0.13	12	Planning Permission (170019) for student accommodation has been rejected, and is currently at appeal. Developer currently attempting to develop site for student accommodation, so not a readily available alternative.	N
AB095	3-4 Wesley Gate, Queens Road	0.07	13	Prior Approval (170314) for conversion of offices to 14 flats has been granted, and will likely be built out. Site is therefore not a reasonably available alternative.	N
AB013	Reading Prison	1.44	72	Proposed uses include residential and leisure as part of a comprehensive scheme, which is not comparable with the purely residential uses on the scheme site. Site is therefore not a suitable alternative to accommodate the scheme proposals.	N
TI003	Land at Conwy Close/Meadway Comprehensive School	1.24	57	Planning permission (161390) has been granted for 57 dwellings at the site, and numerous conditions have been discharged, signalling that development is going ahead. The development is a mix of houses and flats, and so is not comparable to our development. The site is therefore not a readily available alternative.	N
TH007	The Arthur Clark Home, Dovedale Close	0.48	39	Planning Permission (152277) has been granted for the erection of 43 extra care apartments at the site. Conditions have been discharged which suggests that the development is going ahead. The site is therefore not a readily available alternative.	N
SO008	Amethyst Lane	0.57	36	The suburban location of the site is unlikely to be suitable for the high density, flattened development of the proposed scheme. It is therefore not a comparable site.	N

HELAA /Planning app. reference	Address	Size (ha)	Net capacity within 5 years from HELAA	Comments	Reasonably Available Alternative Y/N
SO006	72 Bath Road	0.9	12	10 square metres of leisure uses, and 41 square metres of other uses are proposed in the Sequential and Exception Tests Document, which means that the development is not of a similar character to that proposed on our site. The site is therefore not a comparable alternative and suitable to accommodate the proposed scheme.	N
SO003	The Alice Burrows Home, Dwyer Road	0.48	20	The site lies within a suburban location and so is not comparable as it is of a different character and within a different type of area - the scheme proposals of high density flatted development are unlikely to be suitable in this location.	N
RE016	Dingley House, 3-5 Craven Road	0.33	17	The HELAA states that the site is developable within the next 6-15 years. This means it is not comparable with scheme site which is deliverable within the next 5 years. It has recently has a planning application (171954) for 25 retirement living units rejected, which indicates that the site is also being persude by a third party. The site is therfore not available or achievable.	N
RE015	Land adjacent to 40 Redlands Road	0.43	26	The suburban location of the site is unlikely to be suitable for the high density, flatted development of the proposed scheme. It is therefore not a comparable site.	
RE010	3-29 Newcastle Road	0.47	18	The HELAA states that the site is developable within the next 6-15 years. This means it is not comparable with the scheme site which is deliverable within the next 5 years. The site is therefore not a readily available alternative.	N
PE009	Caversham Park	38.28	32	The HELAA states that the site is developable within the next 6-15 years. This means it is not comparable with the scheme site which is deliverable within the next 5 years. The site is therefore not a readily available alternative.	N