

Flood Risk Assessment Sequential Assessment

Land at Meadow Road, Reading

July 2025

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31st July 2025

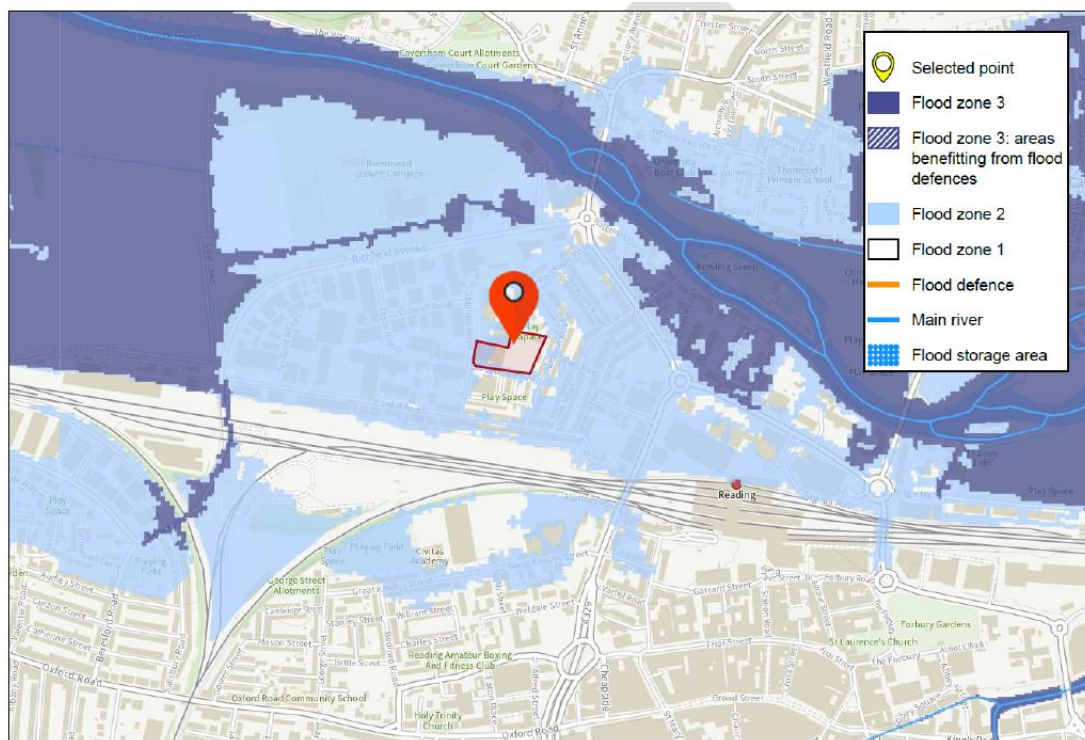
1. Introduction

- 1.1 This Flood Risk Sequential Assessment has been prepared by Turley on behalf of CBRE Investment Management in support of a planning application for:

“Full planning application for the demolition of existing and construction of employment units for flexible uses within E(g)(ii) and (iii), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Meadow Road and Milford Road, parking and landscaping”

- 1.2 The site comprises approximately 5.4 ha of brownfield land in existing employment use, within the settlement boundary of Reading, providing a wide local employment base.
- 1.3 The Environment Agency maps identify the western half of the site falls within Flood Zone 2 as shown by Figure 1.1 below:

Figure 1.1: Extract of Flood Risk Mapping



Source: Figure 5 of Flood Risk Assessment

- 1.4 The flood risk vulnerability of broad development types is set out in Table 2 of the ‘Flood Risk and Coastal Change’ section of the PPG. Table 3 of the ‘Flood Risk and Coastal Change’ section of the PPG indicates that ‘less vulnerable’ land uses, which include Use Class E (light industrial), B2 and B8 uses, are considered appropriate in Flood Zones 2 and 3a, subject to the demonstration through the Sequential Test that no sites within Flood Zones 1 are reasonably available for the proposed development.

2. Planning Policy Considerations and Case Law

The National Planning Policy Framework (Framework) 2024

- 2.1 The Framework sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (paragraph 170).
- 2.2 Paragraph 174 states that the aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding from any source, and that development should not be permitted if there are **reasonably available sites appropriate for the proposed development** in areas with a lower risk of flooding (our emphasis).
- 2.3 Paragraph 169 continues, stating that if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the Exception Test may have to be applied. The need for the Exception Test depends on the potential vulnerability of the site and development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3 of the Framework.
- 2.4 Annex 3 of the Framework states buildings for general industry, storage and distribution are classed as 'less vulnerable'.

Planning Practice Guidance

- 2.5 Planning Policy Guidance ('PPG') indicates that, where necessary, planning authorities should apply the Sequential Test and, if needed, the Exception Test, to ensure that flood risk is minimised and appropriately addressed¹.
- 2.6 Paragraph 024 states that *"The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:*

Within medium risk areas; and

Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.²"

- 2.7 Paragraph 024 states that *"Initially, the presence of existing flood risk management infrastructure should be ignored, as the long-term funding, maintenance and renewal of this infrastructure is uncertain."*

¹ PPG Paragraph: 004 Reference ID: 7-004-20220825

² PPG Paragraph: 024 Reference ID: 7-024-20220825

- 2.8 With respect to planning applications, Paragraph 027 states that the Sequential Test should be applied to major development proposed in areas at risk of flooding, and that *“For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives. Equally, a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location.”*³
- 2.9 Paragraph 028 gives a definition of ‘reasonably available sites’ as *“those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development. These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered ‘reasonably available’”* (our emphasis).
- 2.10 Paragraph 029 states that *“Relevant decision makers need to consider whether the test is passed, with reference to the information it holds on land availability. The planning authority will need to determine an appropriate area of search, based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other ‘reasonably available’ sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market. The applicant may also need to check on the current status of relevant sites to determine if they can be considered ‘reasonably available’”*
- 2.11 PPG builds on paragraph 169 of the Framework in terms of Exception Testing. Paragraph 031 explains that it *“is not a tool to justify development in flood risk areas when the Sequential Test has already shown that there are reasonably available, lower risk sites, appropriate for the proposed development. It would only be appropriate to move onto the Exception Test in these cases where, accounting for wider sustainable development objectives, application of relevant local and national policies would provide a clear reason for refusing development in any alternative locations identified”*.
- 2.12 PPG sets out the circumstances where the Exception Test will be required.

³ PPG Paragraph: 027 Reference ID: 7-027-20220825

- 2.13 As the Site lies within Flood Zone 2 and is for general industry, storage and distribution uses it is classified as 'less vulnerable', as per Table 2⁴ (replicated below) the Exception Test is not required.

Figure 2.1: Extract of Table 2: Flood risk vulnerability and flood zone 'incompatibility' from PPG

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

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:

✓ Exception test is not required

X Development should not be permitted

Reading Local Plan 2019

Policy EN18: Flooding and Sustainable Drainage Systems

- 2.14 Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change.

Policy EM2: Location of New Employment Development

- 2.15 The western half of the site sits within a Core Employment Areas, referred to as EM2g: Richfield Avenue.

Policy WR3b: 2 ROSS ROAD & PART OF MEADOW ROAD

- 2.16 Allocates the eastern half of the site for residential development of circa 39-60 dwellings.

⁴ Paragraph: 079 Reference ID: 7-079-20220825

Reading Level 2 Strategic Flood Risk Assessment (May 2025)

- 2.17 The eastern half site has been assessed as part of the Council's Strategic Flood Risk Assessment (Levels 1 and 2) to support its emerging allocation. The SFRA notes that *"none of the site is located in Flood Zone 3a or 3b with the majority of its area falling in Flood Zone 1"*. Whilst access routes to and from the site are located within Flood Zone 2 and the design flood extent, development is already established in the area and *"it should not be a barrier to development"*.
- 2.18 The proposed use is categorised as a "less vulnerable" use as defined in the Flood Risk Vulnerability Classification, rather than the 'more vulnerable' use of the site for residential dwellinghouses as allocated within the adopted and emerging development plan.

Case Law

R (Mead Realisations Ltd. & Redrow Homes Ltd.) v. Secretary of State for Levelling Up, Housing and Communities [2024] EWHC 279 (Admin) ("the Judgment").

- 2.19 The Judgment of Mr Justice Holgate was handed down on 12th February 2024.
- 2.20 This Judgment was upheld by the Couty of Appeal on 30th January 2025 (Citation Number [2025] EWCA Civ 32).
- 2.21 Parts of the Judgment which are particularly relevant to this Sequential Test and Methodology are set out below.

Type of Development

- 2.22 Paragraphs 102 to 104 of the Judgment consider the type of development being proposed and if there is a specific need or demand for this. The Judgment confirms that in line with Paragraph 162 of the NPPF (now Paragraph 174), this is a matter of judgment for the decision-maker to assess, and to decide whether it justifies carrying out the sequential assessment for that specific type or description of development (para 102).
- 2.23 Paragraph 103 of the Judgment confirms that a need and/or market demand case could be based on a range of factors, such as the location, the mix of land uses proposed and any interdependence between them, the size of the site needed, the scale of the development, density and so on. The Judgment states that the decision-maker may also assess whether flexibility has been appropriately considered by the developer and LPA.
- 2.24 At Paragraph 104, the Judgment holds that depending on the merits of the case put forward, this may be relevant to deciding the appropriate area of search and whether other sites in lower flood risk zones have characteristics making them "appropriate" alternatives.

Series of Sites (Disaggregation)

- 2.25 The PPG states that "reasonably available sites" could include "a series of smaller sites." At Paragraph 110 of the Judgment, it holds that *"the word "series" connotes a relationship between the sites appropriate for accommodating the type of*

development which the decision-maker judges should form the basis of the sequential assessment” (our emphasis)

- 2.26 It continues, stating that “This addresses the concern that a proposal should not automatically fail the sequential test because of the availability of **multiple, disconnected sites across a local authority’s area**. The issue is whether they have a **relationship** which makes them suitable in combination to accommodate any need or demand to which the decision maker decides to attach weight” (our emphasis).
- 2.27 When considering whether there are multiple sites that could form a “series” and their sequential preferability, the decision maker must consider Paragraph 110 of the Judgment, which is whether such sites *“have a relationship which makes them suitable in combination to accommodate any need or demand to which the decision-maker decides to attached weight”* alongside Paragraph 164 of the Judgment: whether these sites could *“deliver the range of interconnected benefits which the appeal scheme would deliver and for which there was a need”*.

Timescales for Development

- 2.28 Paragraph 028 of the PPG states that *“reasonably available sites are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development”*.
- 2.29 Paragraph 174 of the Framework states that *“Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.*
- 2.30 At Paragraph 106 of the Judgment, Holgate J. is clear that Paragraph 162 (now 174) of the Framework does not require that the availability of an alternative site should always align closely with the trajectory of the developer’s proposal.
- 2.31 The paragraph continues, stating that flexibility on all sides is a relevant consideration. Similarly, Paragraph 121 of the Judgment states, regarding the Lynchmead case and claim, that *“allowing for flexibility, the Inspector was entitled to say that development of an alternative site did not have to follow the same timescale as was envisaged for the appeal proposal. He recognised that the start date and build-out rates can be affected by many site-specific factors”*.
- 2.32 The question of this flexibility is referenced again at Paragraph 170 of the Judgment. The Bushey case discounted some sites larger than the appeal site on the basis of timescales to develop. The Inspector in this case was critical of the amount of evidence put forward by Redrow to support this point and whether this would be outside of the expected timeframe for delivery of the proposed development. In relation to this, the Judgment holds that *“In other words, the Inspector did not reject the timescale put forward by Redrow. The flaw in its case was the lack of evidence to show that alternative sites would take materially longer to come forward.”*
- 2.33 The Judgment therefore holds that precise or close alignment of expected delivery timescales is not strictly necessary. Instead, it is a matter of whether alternative sites would take materially longer to come forward than the application site.

- 2.34 This position was upheld by the Court of Appeal who noted at paragraph 48 of the Judgment that:

“What the PPG guidance did was to clarify – or “elucidate” – the NPPF policy as written. And it did so in flexible language, not in prescriptive terms. It prompts the exercise of evaluative judgment by the decision-maker. Its first paragraph invites the decisionmaker to judge what is a “suitable location for the type of development”, and whether or not there is “a reasonable prospect that the site is available to be developed at the point in time envisaged for the development”.

Development Need

- 2.35 As stated above, the Judgment holds that a specific need for a particular type of development could inform the catchment of the search area for the sequential test. Paragraphs 173, 174 and 178 of the Judgment are relevant to the relationship between (in this case) housing need and the sequential test.
- 2.36 At Paragraph 173, the Holgate J. holds that he agrees with the Secretary of State’s advocate in that *“that approach describes the type of exercise which is undertaken in the preparation and examination of a development plan (see e.g. para. 026 of the PPG). Where there remains unmet need which cannot be allocated to areas satisfying the sequential test, that factor together with any other constraints, may lead to a policy decision that not all of the identified need should be met. Alternatively, it may be decided that all or some part of that residual need should be met notwithstanding that the sequential test has not been satisfied. Either way, the treatment of unmet need is not an input to the sequential assessment for identifying reasonably available alternative sites. The sequential approach is not modified in those circumstances. Instead, the policy-maker will decide what to do with the outcome of applying the sequential test.”*
- 2.37 Paragraph 174 continues, *“A similar analysis applies in the determination of planning applications. Where there is an unmet need, for example a substantial shortfall in demonstrating a 5-year supply of housing land, that shortfall and its implications (including the contribution which the appeal proposal would make to reducing that shortfall) are weighed in the overall planning balance against any factors pointing to refusal of permission (including any failure to satisfy the sequential test). If the total size of sequentially preferable locations is less than the unmet housing need, so that satisfying that need would require the release of land which is not sequentially preferable, that too may be taken into account in the overall planning balance. But these are not matters which affect the carrying out of the sequential test itself. Logically they do not go to the question whether an alternative site is reasonably available and appropriate (i.e. has relevant appropriate characteristics) for the development proposed on the application or appeal site. Instead, they are matters which may, for example, reduce the weight given to a failure to meet the sequential test, or alternatively increase the weight given to factors weighing against such failure.”*
- 2.38 Paragraph 178 states that Holgate J. *“can see that if Redrow had submitted to the Inspector that there was a substantial need for housing which could not be met entirely on sequentially preferable sites (and even more so in the next 5 years), so that*

additional sites with a similar or worse flood risk would need to be developed, that would be a significant factor to be addressed in the overall planning balance. It could reduce the weight to be given to the failure to satisfy the sequential test. Here the Inspector gave that failure “very substantial weight”. It would have been arguable that the flood risk implications of satisfying the unmet need for housing land was an “obviously material consideration,” such that it was irrational for the Inspector not to have taken it into account (*R (Friends of the Earth Limited) v Secretary of State for Transport* [2021] PTSR 190 at [116] to [120]). Alternatively, it could have been said that there was a failure to comply with the duty to give reasons in relation to a “principal important controversial issue” between the parties.

- 2.39 These extracts of the judgment show that a failure to comply with the sequential test is not automatically fatal to a planning application. It shows that other material considerations, such as development need or a lack of supply, may mean that a failure to comply with the sequential test, or a failure to be the most sequentially preferable site within a search area can be outweighed by the planning balance.

3. Methodology

Introduction

- 3.1 In accordance with the policy, guidance, appeal decisions and case law set out above, it is necessary to define the parameters of the Sequential Test and it is proportionate to set out a methodology for the undertaking of the Test.
- 3.2 The Applicant is required to identify where there are any other 'reasonably available' sites within the search area, that have not already been identified by the planning authority in site allocations or relevant housing assessments.

Geographical Area

- 3.3 Due to the scale and type of development proposed, a borough wide search area has been adopted. This search area will ensure that a robust assessment of sequentially preferable sites is undertaken.

Sources of Sites

- 3.4 The following sources of evidence have been used to derive the most comparable alternative sites:
- Housing and Economic Land Availability Assessment (HELAA) (version dated November 2024), to include those sites that have been included for industrial and logistics in whole and part and identified as potentially suitable or suitable for development of this nature;
 - Sites with planning permission for commercial uses, which meet the criteria set out below registered after 1st January 2024; and
 - Any commercial schemes sites being marketed for sale on a freehold basis within the above criteria (from EGI Property Link, Rightmove Commercial and local agent websites).

Series of Sites, Disaggregation and Site Capacity

- 3.5 It is important to highlight that the development being pursued is to satisfy identified market needs due to the current lack of available sites in the Borough.
- 3.6 Given the requirements of national guidance, the methodology has been proposed to consider whether sites identified for inclusion within the assessment can accommodate the 'same or similar to the development' being proposed through the planning application.
- 3.7 The operational requirements of type of intended occupiers expected to occupy the proposed development are significant when applying the sequential approach. Similarly, to achieve the level of development required, a certain developable area needs to be achieved to ensure adequate servicing, parking and other necessary ancillary services.

- 3.8 The PPG also states that ‘reasonably available sites’ could include a series of smaller sites and/or parts of a larger site, if these would be capable of accommodating the proposed development.
- 3.9 To ensure that all possible sites and series of sites are considered as part of the sequential test, this assessment reviews sites spatially to establish where series could be formed.
- 3.10 An example of this is where two adjacent sites are submitted to a call for sites consultation separately due to being under different landownerships or promotional agreements and are therefore registered separately on the Housing and Economic Land Availability Assessment. To ensure that sites are not viewed in silo, site locations are reviewed to establish where sites can be grouped together, so to not prematurely discount smaller sites from the assessment.
- 3.11 The matter of disaggregation of a development across unconnected sites was a key consideration in the Judgment summarised in section 3 above. The Judgment handed down relating to these two appeals also addressed this point. It reads that the word ‘series’ connotes a relationship between sites; that the decision maker must consider whether such sites have a relationship which makes them suitable in combination to accommodate any need or demand to which they attach weight; or whether they would, in combination, deliver the range of interconnected benefits which the appeal would deliver and for which there was a need.
- 3.12 The proposals comprise 11 units of varying sizes totalling approximately 4,300m² GEA, Class E (research and development and light industrial), B2 and/or B8 of the Use Classes Order. The range of units and the flexible use proposed ensures that there are opportunities for a range of occupiers to locate to the site. This is essential to the nature of the planning application and therefore to be comparable any alternative has to have this in mind.
- 3.13 In a case such as this, where the development cannot be split across sites without a relationship, the flexibility to be afforded to that series of sites is important, as emphasised in the Judgment.
- 3.14 A recent appeal decision (Appeal Reference Number: APP/Z3635/W/24/3342657) at land East of Vicarage Road, Sunbury-on-Thames TW16 7LB, considered the matters of the sequential test and assessed sites with a **10% smaller site area**. The was accepted by the Inspector and the Council.
- 3.15 For the purposes of the sequential assessment, we consider flexibility of 10% smaller and 10% larger than the applications proposals an appropriate basis for this sequential assessment.
- 3.16 The proposed development is also for the development of 4,293sqm GEA of flexible uses within Class E (research and development and light industrial), B2 and/or B8 of the Use Classes Order (including ancillary office provision).

- 3.17 As a result, this sequential test discounts sites where the capacity is more than 10% smaller or larger than the application proposals. This is sites or series of sites which cannot accommodate or are not:
- 0.801 hectares or greater; and
 - Between 3,863.7 sqm and 4,730sqm of GEA floorspace for Class E (research and development and light industrial), B2 and/or B8 of the Use Classes Order
- 3.18 This approach shows flexibility in setting out parameters for the site search, as emphasised by the Judgment and recent appeal decisions.

Flood Risk Discounting

- 3.19 The Application Site is located within Flood Zone 2, as shown at Figure 2.1.
- 3.20 Sites with a higher flood risk (i.e. part or all of the site lies within Flood Zone 3 have been discounted as alternative sites). In addition, sites identified as within Flood Zone 2 have also been discounted on the basis they do not represent sequentially preferable alternatives.

Planning Considerations

- 3.21 The next stage is to assess the filtered sites against strategic planning policies and to consider any planning permissions that could affect the ability of the sites or series of sites to accommodate the proposals. This could include planning policy reasons for the inappropriate nature of sites, such as a location within a NPPF Footnote 7 sites, or where extant planning permissions would not comply with the proposed development.
- 3.22 It will also consider whether there is a reasonable prospect that the site is available to be developed at the point in time envisaged for the proposed development.

Summary of Methodology

- 3.23 Against this background, it is proposed that the following parameters will be adopted in addressing the sequential test. The purpose of these parameters is to ensure that the sites being assessed are comparable to that of the application site and would ultimately be capable of providing the type and character of development which is similar to the application scheme.
- Sites which are 0.801 hectares or greater; and
 - Sites which can accommodate between 3,863.7 sqm and 4,730sqm of GEA floorspace for Class E (research and development and light industrial), B2 and/or B8 of the Use Classes Order
 - The acceptability of the site in planning policy terms to demonstrate the sites are deliverable and developable with regard to being a reasonably available sites (as defined by the Judgment) appropriate for the proposed development

with a prospect of planning permission being granted for 'the same or a similar development';

- The site is being marketed and is available for freehold purchase by the Applicant; and
- Flood Risk – sites within Flood Zone 1 (being sequentially preferable).

4. Sequential Test

Introduction

- 4.1 This Flood Risk Sequential Test has considered a total of 32 sites across Reading, using information from the Housing and Economic Land Availability Assessment (HELAA) (version dated January 2024); sites with planning permission for commercial uses; and any commercial schemes sites being marketed for sale on a freehold basis.
- 4.2 This data provides a thorough review of potential sites for development within the Borough.

Site Capacity

- 4.3 The parameters of this sequential assessment noted that sites greater than 0.801 hectares and sites which can accommodate between 3,863.7 sqm and 4,730sqm of GEA floorspace for Class E (research and development and light industrial), B2 and/or B8 of the Use Classes Order. This provided for development 10% less or greater than the proposed development.
- 4.4 Of the 32 sites assessed, 27 sites and series of sites did not meet these parameters.
- 4.5 A schedule of these 27 sites are held at **Appendix 3**.

Flood Risk

- 4.6 The flood risk of all sites was considered as part of this sequential test and this is documented within Appendix 3, 4 and 5.
- 4.7 Following the discounting of the 27 sites which do not meet the parameters of the assessment, there was 1 sites which was within Flood Zone 2 and 3. This site is not sequentially preferable.
- 4.8 This site is shown at **Appendix 4**.
- 4.9 This leaves 4 sites which could accommodate the site size and capacity required and do not present a sequentially worse flood risk than the application site.

Planning Considerations

- 4.10 The Sequential Test so far has shown that of the 4 sites from the 32 entries sourced which could potentially accommodate the development in terms of total site size and capacity requirements and which are not at a higher risk of flooding than the application site.
- 4.11 The next stage of the sequential test assesses whether there are any planning policy reasons why these sites could not deliver the proposals or if any extant permissions affect whether the development could be delivered on those sites or if there are availability issues with the sites.

- 4.12 This part of the test found that 4 of the 4 sites would not be able to accommodate the proposals for reasons relating to availability.
- 4.13 A list of these sites is held at **Appendix 5**.

5. Conclusions

- 5.1 Having regard to the NPPF and supporting PPG and national guidance, a Sequential Assessment has been undertaken in respect of the proposed development at the Land at Meadow Road, Reading in respect of the its location in a Flood Zone.
- 5.2 The application site is part located within Flood Zone 2. The general thrust of flood risk policy is to direct development away from areas at the highest risk of flooding. Where development is to be located in areas at risk of flooding, it should be both safe and where possible, reduce the risk of flooding elsewhere. The underlying objective of policy is therefore to facilitate development that preferably doesn't flood but where this is unavoidable, ensure that there are precautions in place to limit damage and risk to life.
- 5.3 The proposed development comprises a 'less vulnerable use' and is acceptable in principle in Flood Zone 2, subject to the application of the Sequential Test.
- 5.4 In line with national policy, all 'reasonably available sites' have been assessed. The assessment included a review of potentially suitable sites identified promoted through the HEELA with a review of the prospects of each site being appropriate for the proposed development with regard to flood risk, size, planning policy support and technical constraints. In addition, sites being actively marketed for freehold sale have also been reviewed.
- 5.5 This Sequential Assessment has demonstrated that the application site is an appropriate location for the proposed employment development and, in particular, that there are no sites within the whole of Reading which could be determined as sequentially preferable.
- 5.6 Taking all the above into account, it is clear that the Sequential Assessment has been undertaken in accordance with National Guidance and suitably demonstrates that the application site is one of most appropriate and therefore sequentially preferable site for the proposed development within the borough.

Appendix 1: Site Location Plan

Appendix 2: Site Layout Plan

Appendix 3: Discounted sites on basis of site capacity / site size parameters

Source: Housing and Economic Land Availability Assessment (2024)

Site Name and Address / HELAA Ref (if Appropriate)	Site Area (ha)	Description	Flood Zone	Any issues preventing development of the site	Suitability	Availability	Approx. capacity	Conclusions
31 Great Knollys Street HELAA Ref: AB020	0.04		92% in Flood Zone 2	-	-	HELAA proposes the loss of the employment site.	-270sqm of industrial logistics floorspace.	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonability available for the proposed development. Site falls below the assessment criteria of this sequential assessment. Site is also located in flood zone 2 and therefore not sequentially preferable.
63 Great Knollys Street HELAA Ref: AB023	0.1		98% in Flood Zone 2	-	-	HELAA proposes the loss of the employment site	-186sqm of industrial logistics floorspace.	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonability available for the proposed development. Site falls below the assessment criteria of this sequential assessment. Site is also located in flood zone 2 and therefore not sequentially preferable.
1a North Street HELAA Ref: AB026	0.04		26% in Flood Zone 2	-	-	HELAA proposes the loss of the employment site	-366sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonability available for the proposed development. Site falls below the assessment criteria of this sequential assessment.
7 Weldale Street HELAA Ref: AB030	0.14		1% in Flood Zone 2			HELAA proposes the loss of the employment site	-478sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonability available for the proposed development. Site falls below the assessment criteria of this sequential assessment.

Land adjacent to 22 Portman Way HELAA Ref: BA002	0.21	100% in Flood Zone 2	-	HELAA proposes the loss of the employment site	-755sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development. Site falls below the assessment criteria of this sequential assessment. Site is also located in flood zone 2 and therefore not sequentially preferable.
Rose Kiln Lane Court HELAA Ref: CO009	0.66	Flood Zone 1	-		HELAA indicates 2,070sqm	Site falls below the assessment criteria of this sequential assessment.
John Lewis Depot HELAA Ref: KA001	0.37	Flood Zone - 1	-	HELAA proposes the loss of the employment site	-1,734sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development. Site falls below the assessment criteria of this sequential assessment
268 Elgar Road South HELAA Ref: KA005	0.41	Flood Zone 1		HELAA proposes the loss of the employment site	-2,115sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development. Site falls below the assessment criteria of this sequential assessment
272-274 Elgar Road South HELAA Ref: KA006	0.41	Flood Zone 1		HELAA proposes the loss of the employment site	-1,298sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development. Site falls below the assessment criteria of this sequential assessment
Sehmi Builders Merchants, Rose Kiln Lane HELAA Ref: KA009	0.38	10% Flood - Zone 3 10% Flood Zone 2	-	HELAA proposes the loss of the employment site	-504sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development. Site falls below the assessment criteria of this sequential assessment
220 Elgar Road South HELAA Ref: KA043	0.14	Flood Zone 1		HELAA proposes the loss of the employment site	-512 sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.

						Site falls below the assessment criteria of this sequential assessment
64 Portman Road and 127 Loverock Road	0.74	18% Flood Zone 3 34% Flood Zone 2	-	-	HELAA indicates 1,123sqm	The Site falls below the assessment criteria of this sequential assessment
HELAA Ref: KE011						
Stadium Way	4.08	63% Flood Zone 3 98% Flood Zone 2	-	-	HELAA indicates 1,330sqm	The development quantum proposed through the HELAA falls below the parameters of this sequential assessment.
HELAA Ref: KE012						Site is also located in flood zone 2 and 3 and therefore not sequentially preferable.
1-15 St George's Road	0.15	Flood Zone 1	-	-	HELAA proposes the loss of the employment site	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.
HELAA Ref: NO006					-675 sqm of industrial / logistics floorspace	Site falls below the assessment criteria of this sequential assessment
Land at 132 – 134 Bath Road	0.51	Flood Zone 1	-	-	HELAA proposes the loss of the employment site	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.
HELAA Ref: SO009					-837 sqm of industrial / logistics floorspace	Site falls below the assessment criteria of this sequential assessment
Shurgurd Self Storage	0.57	100% Flood Zone 2	-	-	HELAA proposes the loss of the employment site	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.
HELAA Ref: TH004					-3,297 sqm of industrial / logistics floorspace	Site falls below the assessment criteria of this sequential assessment
						Site is also located in flood zone 2 and therefore not sequentially preferable.
Unit 1, Paddock Road Industrial Estate	0.4	53% Flood Zone 3 100% Flood Zone 2	-	-	HELAA indicates 1,380sqm	Site falls below the assessment criteria of this sequential assessment
HELAA Ref: TH034						Site is also located in flood zone 2 and 3 and therefore not sequentially preferable.

16-18 Bennet Road	0.74		Flood Zone 1	-	-	-	HELAA indicates 2,170sqm	Site falls below the assessment criteria of this sequential assessment
HELAA Ref: WH011								
Bennet Court, Bennet Road	0.75		Flood Zone 1	-	-	-	HELAA indicates 3,220 sqm	Site falls below the assessment criteria of this sequential assessment
HELAA Ref: WH049								
Land bounded by Island Road, Longwater Avenue, A33 and Sewage Treatment Works	9.7	-	Flood Zone 1	As indicated by the HELAA the “DEPZ is a significant issue needing further consideration, but this is an existing allocation.”	HELAA concludes that the sites delivery is subject to Subject to consideration of existing allocation within DEPZ.	HELAA indicates site is available.	HELAA indicates 31,533sqm (net)	The site is for 31,533sqm (net) of new industrial floorspace. It is a fundamentally different scheme to that proposed by the application which seeks smaller hub type development, rather than strategic logistics/ industrial development, inevitably what this site will accommodate. It is not therefore considered a comparable alternative and therefore not reasonably available for the proposed development.
HELAA Ref: WH002								
Part of former Berkshire Brewery Site	3.68	-	Flood Zone 1	-	-	HELAA indicates site is available.	HELAA indicates 15,080sqm	The indicative sqm for the site is significantly greater than the parameters of this assessment and therefore would not be a comparable alternative.
HELAA Ref: WH012								
Brunel Retail Park, Rose Kiln Lane	3.22	-	20% Flood Zone 2	-	-	HELAA indicates site is available.	HELAA indicates 12,440 sqm	The indicative sqm for the site is significantly greater than the parameters of this assessment and therefore would not be a comparable alternative.
HELAA Ref: WH052								

Source: Rightmove Commercial

Site Name and Address	Site Area (ha)	Description	Flood Zone	Any issues preventing development of the site	Suitability	Availability	Approx. capacity	Conclusions
Unit 1 Acre Road, Reading, Berkshire, RG2 OSU	Unkno wn	Existing industrial unit	1	-	Marketing details at : 1, Acre Road, Reading, Industrial, To Let - DTRE	The property is available by way of either a sublet or assignment of the existing lease. Alternatively, a new lease may be	66,559sq ft	The site is not available for freehold purchase and is not therefore considered reasonably available for the Applicant.

						available from the landlord.		
Tesseract, Worton Grange, Worton Drive, Reading, RG2 OTG	1.38	Existing R&D, production & storage facility	1	-	Marketing details at: Tesseract, Worton Grange, Reading, Office / Industrial / Warehouse, To Let - Haslams	The premises are available to let on an FRI lease for a term up to 1st April 2032	55,342 sq ft	The site is not available for freehold purchase and is not therefore considered reasonably available for the Applicant.
Greenlight Reading, Bennett Road, Reading, RG2 0QX	Unkno wn	Existing industrial unit	1		Marketing details at: Greenlight Reading, Bennett Road JLL Properties - UK Site has recently been developed and therefore would not be economic to rebuild and deliver a development akin to that proposed by this application	Rightmove commercial indicates the site is available to lease. Not freehold purchase.	4,523 sq m	The site is not available for freehold purchase and is not therefore considered reasonably available for the Applicant.
Deacon Way, Reading, RG30 6AZ	Unkno wn	Existing industrial unit	3		Details at: Light industrial facility to lease in Deacon Way, Reading, RG30 6AZ, RG30	Rightmove commercial indicates the site is available to lease. Not freehold purchase	2,481 sq m	The site is not available for freehold purchase and is not therefore considered reasonably available for the Applicant. Is also located within Flood Zone 3 and therefore not sequentially preferable.
Unit 2, Island Road West, Reading, RG2 ORP	Unkno wn	Existing industrial unit	-		Details at: https://www.rightmove.co.uk/properties/147208052#/?channel=COM_LET	Rightmove commercial indicates the site is available to lease. Not freehold purchase	1,380 sq m	The site is not available for freehold purchase and is not therefore considered reasonably available for the Applicant. The site of the unit also does not meet the parameters of this assessment.

Appendix 4: Sites discounted on basis of Flood Risk

Source: Housing and Economic Land Availability Assessment

Site Name and Address / HELAA Ref (if Appropriate)	Site Area (ha)	Description	Flood Zone	Any issues preventing development of the site	Suitability	Availability	Approx. capacity	Conclusions
Land south of Island Road HELAA Ref: WH001	32.13	Previously developed land.	3% in Flood Zone 3 41% in Flood Zone 2	The site is located within a mineral safeguarding area and is identified as a site required for waste purposes.	Several aspects require further investigation, and transport issues need to be considered, but in principle employment development is potentially suitable subject to DEPZ as existing allocation.	HELAA indicates the site is available.	HELAA indicates 94,221sqm	As indicated by the HELAA the site is subject to a number of constraints including transport. This means that the site is not reasonably available within the time frame envisaged by this planning application. Furthermore the site is for 94,221sqm of new industrial floorspace, it is a fundamentally different scheme to that proposed by the application which seeks smaller hub type development, rather than strategic logistics development, inevitably what this site will accommodate. It is not therefore considered a comparable alternative. Furthermore, circa 50% of the site is within Flood Zone 2 and 3, in a similar manner to the proposed application and therefore is not sequentially preferable.

Appendix 5: Sites Discounted on Basis of Planning and Availability Considerations

Source: Housing and Economic Land Availability Assessment

Site Name and Address / HELAA Ref (if Appropriate)	Site Area (ha)	Description	Flood Zone	Any issues preventing development of the site	Suitability	Availability	Approx. capacity	Conclusions
Land at Kentwood Hill HELAA Ref: KE002	1.52	-	Flood Zone 1	-	-	HELAA proposes the loss of the employment site with site promoted and identified for residential uses.	-78 sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.
38-41 Kenovan Drive HELAA Ref: TH014	2.07	-	9% Flood Zone 2	-	-	HELAA proposes the loss of the employment site with site promoted and identified for residential uses	-2,357 sqm of industrial / logistics floorspace	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.
DHL, Gillette Way HELAA Ref: WH003	4.53	-	2% in Flood Zone 2	-	-	HELAA proposes the loss of the employment site	- 20,688sqm	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.
1-3 Gillette Way HELAA Ref: WH005	1.75		Flood Zone 1			HELAA proposes the loss of the employment site	-6527	The HELAA concludes that the site is to be converted in to residential use. It is therefore not considered reasonably available for the proposed development.

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