



Planning Statement

On behalf of:

Bellway Homes Ltd (Thames Valley)

In respect of:

Application for 215 dwellings with associated access, cycle path provision, parking, landscape and open space provision, following the demolition of existing buildings

at:

Battle Hospital Site, Portman Road, Reading

Date:

February 2018

Reference:

RW/09116/S001rw

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1.0 Introduction & Background

Introduction

- 1.1 This statement has been prepared on behalf of Bellway Homes Ltd (Thames Valley), hereinafter referred to as 'the applicants', in support of their application for the redevelopment of land at the Former Battle Hospital Site. Portman Road, Reading. The application seeks detailed planning permission for the following:

"Application for 215 dwellings with associated access, cycle parking provision, parking, landscaping and open space provision, following the demolition of existing buildings."

- 1.2 The submission of the application follows a detailed programme of consultation, including discussion with Reading Borough Council officers, key stakeholders and members of the public at a public exhibition. The proposed scheme has evolved in response to feedback received as part of that process.
- 1.3 The application design team have completed a thorough formal pre-application process with RBC with an initial submission made in February 2017 and following several subsequent submissions and written advice from the Council was concluded at a final meeting in November 2017.
- 1.4 This pre-application process has been supplemented by a public exhibition which took place on 13 December 2017 and discussions have also been ongoing with key stakeholders and consultees. In accordance with good practice this process has involved local people and key stakeholders in the evolution of the planning process which in turn has influenced the final design. In particular the design has been amended in a number of important ways to respond to comments which have been received. These include changes to the following:
- Access arrangements and car parking provision;
 - Omissions of roads parallel to boundaries of the site and greater integration with site surroundings;
 - Tree planting and landscaping;
 - Siting of buildings and provision of amenity space;
 - Provision of north/south pedestrian/cycle path, provision of east/west cycle path and improved linkages with surrounding area;
 - Reduction in the number of dwellings proposed (from 240no. dwellings) and provision of high quality new area of open space;
 - Redesign of housing proposed to south-west corner of the site;

- Elevation design.

1.5 At the final pre-application meeting it was agreed that the scheme as presented provided a good basis for progressing to the application stage, with positive progress made on the scheme to respond to officer comments. It was agreed that the potential to reduce on-street surface parking would be investigated, as would opportunities to soften its appearance with landscaping. The interface of Portman Road with the apartment block elevations (blocks C, D, E & F) would be considered with scope to reduce height of first floor balconies.

1.6 RBC recommended further details of phase 2, to illustrate how it could link with the remainder of the scheme. In addition it was advocated that large scale details of key pedestrian links be provided, with high quality materials used in areas of public realm and to the boundary of parking courts.

Background

1.7 The application site is an allocated housing site in the Council's Sites and Detailed Policies DPD (SDPD) 2012, policy SA8f. It is also the subject of a very dated planning brief (2005), which covered the wider Battle Hospital Site, which replaced its earlier predecessor adopted in 1995.

1.8 While the site remains undeveloped following completed residential and retail development on the wider, former Battle Hospital site, the application site is now largely vacant and detracts from the character and appearance of the area. It is occupied by utilitarian style former hospital buildings which are falling into disrepair and the site has suffered from trespass representing a health risk and adversely affecting the amenity of the area for neighbouring occupiers.

1.9 For these reasons and its longstanding allocation for housing and the benefits which would arise from its positive redevelopment for housing, which Reading are partly reliant on in their 5yr HLS trajectory, there should be a collective desire to see the redevelopment of the site realised.

1.10 This statement considers the application proposals against the relevant planning policy framework, its response to the surrounding area and identified constraints. Where necessary, reference will be made to the package of technical documents which accompany the application which are listed below:

Document Title	Author/Reference
Design and Access Statement	DHA
Transport Assessment	I-Transport
Framework Residential Travel Plan	I-Transport
Sunlight and Daylight Report	eb7
Flood Risk Assessment & Drainage Strategy	Odyssey
Noise Assessment	Ian Sharland Ltd
Air Quality Assessment	Mayer Brown Limited
Geo-Environmental Site Assessment	RSK
Arboricultural Impact Assessment	Aspect
Ecological Appraisal	Aspect
Statement of Community Involvement	Instinctif

- 1.11 The statement proceeds on the following basis. Section 2 provides a description of the site. Section 3 details the relevant planning history, section 4 describes the application proposals, section 5 reviews relevant planning policy, section 6 provides an assessment of the application proposals before drawing conclusions at section 7.

2.0 Description of Site and Surrounding Area

- 2.1 The application site which extends to almost 3ha is bordered to the north by Portman Road and Portman Way to the south. To the east of the site are residential properties. To the west is the main access road into the wider Battle Hospital site, which consists of a Tesco Extra superstore and petrol filling station to the west and the Kings Oak residential development to the south. Both the Tesco store and Kings Oak development schemes were granted planning permission in November 2006.
- 2.2 The Kings Oak scheme provides a mixture of housing and apartments, with apartment buildings on the southern side of Portman Way rising to 7 storeys in height. At the centre of the Kings Oak scheme is a large area of open space including a children's playground. Beyond Portman Road to the north is a designated employment area and an elevated rail line.
- 2.3 Running parallel to Portman Way to its south is Oxford Road. It forms part of the Oxford Road District Centre which offers a varied mix of retail and community services. It also provides high frequency bus services which provide regular connections with Reading town centre. Reading west railway station is approximately 800metres from the site. It provides regular services to Basingstoke, Newbury and London Waterloo (changing at Reading main railway station).
- 2.4 The site is currently hoarded off. At the time of writing it contains two active uses. Synergy health Plc occupy a central part of the site which provide hospital sterilisation services. It is understood they have a lease until 2020. The part of the site which they occupy is greyed out on the submitted plans and is excluded from the redline site boundary.
- 2.5 In addition the Ambulance Service operate from the northern part of the site, taking access from the site direct onto Portman Road. It is understood they are soon to vacate the site. The access onto Portman Road was granted a temporary planning permission to ensure the ambulances were not obstructed during the development of the remainder of the wider Battle Hospital site (RBC Ref. 061270)
- 2.6 A number of trees exist on-site, some of which are covered by a Tree Preservation Order (TPO). The TPO (Ref. 103/003) is an area order which covers the wider Battle Hospital site, including the western half of the application site but not the eastern half. Trees which are covered by the TPO include 6 lime trees along the western edge of the site. Three Alder's

towards the north-western edge of the site and some Silver Birch trees in the centre of the site. One further Silver Birch tree is located towards the south-east corner.

- 2.7 Much of the site lies with flood zone 2. The site lies in close proximity to, but outside of an air quality management area (AQMA)
- 2.8 The site does not contain any listed buildings and is not located in a conservation area.

3.0 Planning History

3.1 Planning history records for the site primarily relate to its former use as a hospital. This includes the permission referenced above granting temporary consent for the formation and use of an access from the site direct onto Portman Road by the ambulance service.

3.2 On the adjoining land to the south and west the following permissions have been granted and implemented reflecting its allocation for development, which the application site remains the final part of. These are as follows:

06/00010/FUL – Erection of food store, unit shops, drive through restaurant, petrol filling station, 65 residential units, car parking, creation of public space, landscaping, access and associated highway works – Approved 10 November 2006.

06/00011/FUL – Erection of 434no. dwellings and primary healthcare facility with associated car parking, open space, landscaping and new access arrangements – Approved 10 November 2006.

3.3 The submission of this application has been preceded by a detailed pre-application process, during which the application scheme has evolved and been amended to respond to officer feedback. The pre-app which was given reference 170256 has been helpful in agreeing the supporting documents needed to support the application, but also the design approach to be adopted in the proposed scheme, including the following:

- The design approach of providing taller apartment buildings along the northern and western edges of the site, to respond to Portman Road and the high-rise apartment buildings immediately to the south-west corner;
- The desire to limit surface car parking and their provision in attractive landscaped areas;
- The introduction of a podium deck at Block A to conceal car parking and provide landscaped amenity space;
- Provision for high quality pedestrian and cycle links across and through the site to improve permeability. This includes a north/south shared footway/cycleway (3m in width) linking Portman Road and Portman Way; an east/west shared footway/cycleway along the length of the Portman Road site frontage from which a number of links into the development are provided and a shared footway/cycleway/emergency access at the south-east corner of the site connecting to Valentia Road;

- The use of undercroft parking to the apartment buildings and treatment of public facing ground floor facades of the building to avoid dead frontages;
- Provision of an attractive public open space to the east of the site;
- Revisions to the layout of housing in the south-east corner to limit over-looking, the impact of parking and provide defensible space to individual houses.

3.4 The application submission was also preceded by a public exhibition which took place on 13 December 2017 at Emmanuel Methodist Church, Oxford Road between 3pm and 7pm. The exhibition which was publicised by delivery of 1,200 informative leaflets describing the proposals to local residents and stakeholders. The event was attended by local councillors and residents who were interested in the proposals to bring forward development on this long-standing allocated development site. Further details of the event and the feedback received are explained in the Statement of Community Involvement which accompanies the application.

4.0 Description of the Application Proposals

- 4.1 The application proposals, illustrated on DHA drawing ref. 031610-BEL-TV-01 can be summarised as follows:

Layout and design

- 4.2 In accordance with policy requirements, access to the site is proposed from the south off Portman Way, rather than directly from Portman Road. Footways will be provided either side of the access junction linking into a north/south shared footway/cycleway which will connect Portman Way with Portman Road.
- 4.3 As a response to Portman Road apartment blocks are sited along the northern edge of the site, which will continue around the western edge of the site to the south-west corner where block 1 at 6 storeys will provide an appropriate response to the seven-storey apartment building opposite. The apartment buildings rise in height from 3 storeys (block 5), to four storeys (blocks 2, 3 and 4) with 5 storeys at the north-west corner of the site (block 1), stepping up to 6 storeys at the south-west corner.
- 4.4 In the remainder of the site provision will consist of terraced housing of 2, 2.5 and 3 storeys. These have been arranged to address the internal roads and provide active frontages on prominent corner locations.
- 4.5 The main area of open space is proposed at the eastern end of the site with a footpath link connecting the area to Portman Road to the north. Further green amenity spaces are provided between the apartment buildings, with a landscaped podium deck proposed at Block 1, which will provide private amenity space for occupiers of that building.
- 4.6 Each of the houses are provided with defensible space to the front and private garden areas to the rear.
- 4.7 The Synergy unit at the centre of the site, does not form part of the proposals and is excluded from the application red line site boundary. Nevertheless to illustrate how this parcel could be developed in the future to provide a seamless addition to the proposed scheme the submitted layout plan shows how this land parcel could be developed to provide additional housing, when the site becomes available.

Housing Mix

- 4.8 The proposed residential development provides a mix of apartments and family sized housing as reflected in the table below:

Accommodation Schedule

Dwelling Type	Total No.
1 bed apartments	45
2 bed apartments	105
2 bed coach houses	2
3 bed apartments	14
3 bed houses	49
Total	215

- 4.9 As agreed with officers during the pre-application process the nature of the site and surrounding land uses lends itself to a high-density scheme with larger apartment buildings located along the northern and western edges of the site. This provides an appropriate response to the busy Portman Road and the larger scale commercial buildings opposite. In doing so the apartment buildings can act as a buffer for the remainder of the site, and provides appropriately scaled buildings in keeping with the commercial buildings to the north and the apartment buildings on the Kings Oak scheme to the south-west.
- 4.10 This approach is consistent with the emerging Local Plan which has recognised that to keep pace with increased housing needs more efficient use of allocated housing sites will need to be made of existing allocated housing sites like this one. This is reflected in indicative no. of dwellings to be realised from the site increasing to 160-240 in draft policy WR3i. This represents a considerable increase on that noted in the adopted SDPD policy SA8f which notes a range of 45-95 dwellings.
- 4.11 The design approach to provide apartments along the northern and western edges of the site inevitably limits the available land on which houses can be provided. Nevertheless all the houses proposed would be 3bed (49no.) which would be supplemented by 14no. 3 bed apartments, representing 29% of overall provision.
- 4.12 The level of affordable housing the site can offer is subject to viability testing, a process which will be concluded during the consideration of the application.

- 4.13 The proposed development would have a density of 77dph, which would be comfortably with the range specified in the emerging Local Plan policy WR3i and be in keeping with the character of the local built environment including the Kings Oak scheme to the south at c.78dph.

Landscaping and Open Space

- 4.14 As explained above part of the site is covered by a TPO, area order which was imposed on the wider Battle Hospital site. It is understood the TPO was imposed as a pre-cautionary measure pending the consideration of applications to redevelop the site rather than due to the amenity value or quality of the trees on-site.
- 4.15 The trees on-site have been surveyed by the applicants arboricultural consultants. The trees have found to be of mixed quality with only one of the trees covered by the TPO falling with the B category. The remainder are either category C or U trees with no category A trees.
- 4.16 The category B Silver Birch T46 is to be retained. Given the limited quality of the remainder of the trees an approach has been adopted by which their loss will be mitigated by a comprehensive scheme of new tree planting. This will include the provision of new high-quality semi-mature tree planting at the edges of the site with Portman Road and the western edge of the site. In addition tree avenues will be created through street tree planting along the edge of the main access road through the development.
- 4.17 This will be supplemented by hedgerow planting and the provision of attractive landscaped green spaces at the eastern end of the site, on the podium deck and around the apartment buildings. The landscape strategy will be to create an improved townscape setting for the residential buildings while also providing mitigation for necessary tree and vegetation removal.

Access and Car Parking

- 4.18 In accordance with policy the primary access to the development will be from Portman Way to the south. This will allow for the closure of the access direct onto Portman Road, used by the Ambulance service, which was only ever approved on a temporary basis.
- 4.19 Vehicular traffic to the proposed apartments and houses will be served off this single access road. This will be supplemented by improved pedestrian and cycle links across and through the site. As sought by the adopted SDPD policy (SA8f) and emerging Local Plan policy (WR3i) the proposals enhance pedestrian and cycle permeability through the site including the provision of a continuous footpath/cycleway along the northern frontage of the site with

Portman Road. The proposals also fulfil its role in delivering a pedestrian/cycle route linking Portman Road with Portman Way, which is consistent with the desire expressed in the Battle Hospital Planning Brief of achieving a pedestrian/cycle access from Portman Road to Oxford Road.

- 4.20 Further linkages will be provided from the north-east corner of the site at Portman Road into the proposed public open space area on the site. An additional pedestrian and cycle link will be provided linking the site to Valentia Road at the south-west corner of the site.
- 4.21 Parking will be provided via a mix of on-plot parking, undercroft/concealed parking areas and small parking courts, road side parking bays in a landscaped setting.

S106/CIL

- 4.22 With CIL now in place S106 obligations may only be secured in respect of affordable housing and site-specific measures required to mitigate the impact of the development. These have been discussed with officers at the pre-application stage. The S106 is anticipated to be restricted to the following heads of terms:
- Affordable housing;
 - Access improvements, details to be confirmed but may include new toucan crossing;
 - Employment skills and training;
 - Laying out of public open space and provision for its maintenance;
 - Contribution toward footpath linking Portman Road and Cow Lane Bridges

5.0 Relevant Planning Policy and Guidance

National Planning Policy

- 5.1 National Planning Policy is now provided for in the National Planning Policy Framework (NPPF) with further guidance provided in Planning Practice Guidance (PPG).
- 5.2 The Framework states, at **paragraph 14** that at the heart of the document is a presumption in favour of sustainable development. What this means is that where development is sustainable it should go ahead, without delay.
- 5.3 There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles – economic, social and environmental ones.
- **An Economic role** – contributing to a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.
 - **A Social role** – support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations by creating a high quality built environment.
 - **An Environmental role** – contributing to the protecting and enhancing our natural, built and historical environment; and adapt to climate change including moving to a low carbon economy.
- 5.4 It is clear that providing for housing needs has an essential role to play in achieving each of these dimensions of sustainable development. As the core planning principles make it clear, planning should proactively drive and support sustainable economic development, with every effort to meet the housing and other development needs of an area, and respond positively to wider opportunities for growth.
- 5.5 **Paragraph 47** requires local planning authorities to significantly boost the supply of housing and to ensure their plans meet the full, objectively assessed needs for market and affordable housing in their areas.
- 5.6 **Paragraph 49** of the document states that applications for housing developments should be considered in the context of the presumption in favour of sustainable development.

- 5.7 **Paragraph 50** states that a wide choice of high quality homes to create sustainable, inclusive and mixed communities should be delivered. In order to achieve this local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand and plan for a mix of housing based upon meeting community needs. And, where an affordable housing need is identified, it must set policies to meet this on site unless off-site provision or a financial contribution is made.
- 5.8 **Paragraph 56** states that good design is a key aspect of sustainable development and should contribute positively to making places better for people. The importance of planning positively for the achievement of high quality and inclusive design for all development is outlined in **Paragraph 57**.
- 5.9 **Paragraph 60** states that new development should seek to promote or reinforce local distinctiveness but that decisions should not attempt to impose architectural styles or particular tastes and should not stifle innovation, originality or initiative. Despite the importance of the visual appearance and architecture of individual buildings, securing high quality and inclusive design should go beyond just aesthetic considerations (**paragraph 61**).
- 5.10 With regard to transport, **paragraph 32** confirms that developments which generate significant traffic movements should be supported by a transport assessment. Planning decisions should take account of whether the opportunities for sustainable transport modes have been taken up, which reduces the need for major transport infrastructure. The paragraph confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 5.11 **Paragraph 173** emphasises that the pursuit of sustainable development requires careful attention to viability and costs in plan making and decision-taking. Plans should be deliverable. Site and scale of development identified in plans should therefore not be subject to a scale of obligations and policy burdens to the extent that their ability to be developed viably is threatened. It is acknowledged that without the provision of a competitive return to the landowner and developer, development will not be deliverable.
- 5.12 **Paragraphs 186-187**, advises on decision-taking. It indicates that LPA's should approach this in a positive way, looking for solutions rather than problems. Paragraph 187 confirms that decision takers at every level should seek to approve applications for sustainable development where possible and that LPA's should work proactively to secure developments

which improve the social, economic and environmental conditions of an area.

The Development Plan

- 5.13 The development plan relevant for decision making purposes is the Reading Borough Council Core Strategy (2008) and the Sites and Detailed Policies Document (2012).

Reading Borough Council Core Strategy (2008)

- 5.14 The following policies of the Core Strategy are considered to be relevant to the determination of this application:

- **Policy CS1: Sustainable Construction and Design** – states that proposals for new development will be acceptable where the design of buildings and site layouts take account of sustainable construction technologies and are resource efficient.
- **Policy CS4: Accessibility and the Intensity of Development** – states that the scale and density of development within the Borough will be related to its level of accessibility.
- **Policy CS7: Design and the Public Realm** – this policy states that all new development must be of high design quality that maintains and enhances the character and appearance of the area in which it is located, taking account of layout, landscape, density and mix, scale and architectural detail and materials. Proposed development should make a positive contribution to set urban design objectives, and respond positively to their local context and reinforce local character and distinctiveness.
- **Policy CS9: Infrastructure, Services, Resources and Amenities** – this policy seeks to ensure that development addresses infrastructure impacts. The LPA will require obligations to be entered into pursuant to a S106/legal agreement.
- **Policy CS14: Provision of Housing** – states that provision will be made for the completion of on average of 572 dwellings per annum in the period 2006-2016 in accordance with the spatial strategy.
- **Policy CS15: Location, Accessibility, Density and Housing Mix** – identifies facets that will inform the appropriate density and mix of residential development. It adds that development should provide an appropriate range of housing opportunities in terms of mix of housing types, sizes and tenures. The mix of dwellings should include an appropriate proportion of units designed to Lifetime Homes standard. An indicative density range of 35-55dph is set for accessible suburban locations.
- **Policy CS16: Affordable Housing** – Confirms that 30% affordable housing will be sought from developments of 15 or more dwellings, unless viability considerations justify a lower provision.
- **Policy CS23: Sustainable Travel and Travel Plans** – states that planning permission

will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities.

- **Policy CS24: Car/Cycle Parking** – this states that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- **Policy CS29: Provision of Open Space** provides that all new development should make provision for the open space needs of the development through appropriate on or off-site provision, or contributions towards the provision or improvement of leisure or recreational facilities, including open space.
- **Policy CS32: Impacts on Community Facilities** – Indicates that where development would have an adverse impact or additional burden requiring community facilities mitigation measures should be provided in line with the scale of impact.
- **Policy CS36: Biodiversity and Geology** – states that development should retain, protect and incorporate features of biodiversity or geological interest found within the application site.
- **Policy CS38: Trees, Hedges and Woodlands** – states that significant trees will be protected in conjunction with new developments.

Sites and Detailed Policies Document (2012)

- 5.15 This document was adopted in October 2012. The following policies are considered relevant to the determination of this application.
- 5.16 The application site features in the document, under **Policy SA8: Other Sites for Housing Development (Policy SA8f Part of Former Battle Hospital, Portman Road, Reading)**, which identifies the following development criteria:

Development should:

- *Be accessed from the south rather than directly from Portman Road;*
- *Enhance pedestrian and cycle permeability through the site, including provision of a footpath/cycleway along the northern frontage of the site;*
- *Mitigate any impacts on Cow Lane Bridges and the Norcot Road/Oxford Road/Portman Road roundabout;*
- *Take account of the potential for contamination and noise effects;*
- *Take account of the potential for flooding, including from surface water, and incorporate Sustainable Drainage Systems (SUDS); and*
- *Take account of potential archaeological significance Retain the trees covered by the Area Tree Preservation Order, other important trees, and landscaped frontages;*

- *Retain and enhance green links across the site, as shown on the Proposals Map;*
- *Take account of the potential for biodiversity interest;*
- *Take account of the potential for archaeological significance; and*
- *Take account of the location partially within the Air Quality Management Area.”*

5.17 In addition, the document sets out policies for development management purposes. These include:

- **Policy DM1: Adaptation to Climate Change** – new development to demonstrate how they have been designed to incorporate measures to adapt to climate change.
- **Policy DM2: Decentralised Energy** – the policy states that in addition to Code for Sustainable Homes (NB. The Code for Sustainable Homes has since been withdrawn by the Government), development should demonstrate how consideration has been given to securing energy for the development from a decentralised energy source. Schemes in excess of 20No. dwellings should consider the inclusion of a CHP plant or biomass-fuelled heating scheme or other form of decentralised energy provision within the site, unless unfeasible/unviable.
- **Policy DM3: Infrastructure Planning** – the policy seeks to ensure that proposals for development make appropriate provision for infrastructure provision.
- **Policy DM4: Safeguarding Amenity** – to ensure that development does not cause a significant detrimental impact to the living environment of existing or new residential properties.
- **Policy DM5: Housing Mix** – states that on new developments of 10 or more dwellings (outside the central area), over 50% of dwellings will be of 3 bedrooms or more, and the majority of dwellings will be in the form of houses rather than flats, having regard to all other material considerations.
- **Policy DM10: Private and Communal Outdoor Space** – dwellings should have functional private or communal open space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.
- **Policy DM12: Access, Traffic and Highway-Related Matters** – consideration to be given to the effect of altered access to the transport network on safety, congestion and the environment.
- **Policy DM16: Provision of Open Space** – provides for the provision of publicly available open space.

Supplementary Planning Guidance

Revised Battle Hospital Planning Brief (July 2005)

5.18 At over 10 years old, the Planning Brief is very dated and replaced the original Brief for the site which was produced by the Council in 1995. The Brief was produced to guide the redevelopment of the wider Battle Hospital site including the land on which the Tesco Extra superstore and Kings Oak housing development now sit as well-established features of the

local built environment. Given its age which pre-dates both the Core Strategy and the SDPD, the NPPF and NPPG and with the emergence of a new Local Plan to guide development to a plan period end date of 2036 it is of diminishing relevance in this case. Planning and Development Brief for the site. Nevertheless it emphasises a number of design principles as follows:

- The major part of the development area should be accessed from a single vehicular access point on Portman Road (as now delivered);
- There should be no vehicular through route between Oxford Road and Portman Road;
- There should be at least one through pedestrian/cycle access from Portman Road to Oxford Road and an east-west link through the site. The SPD provides a set of principles for the future comprehensive redevelopment of the site.

Parking Standards and Design SPD (2011)

- 5.19 The SPG, revised in 2011, sets out relevant car parking standards and guidance for general parking design and layout. The site is located within zones 2.

Community Infrastructure Levy (CIL)

- 5.20 The Council's CIL charge was approved in January 2015 and took effect from 1st April 2015. The charge for residential development is £120 per/m².

Planning Obligations Under S106 SPD (2015)

- 5.21 The CIL charge should be considered alongside the Council's SPD on S106. This document sets out the basis on which obligations will be sought.

Sustainable Design and Construction SPD (2011)

- 5.22 The document aims to promote high standards of sustainable Design and Construction and provides details of how to comply with development plan policies CS1 and CS2.

Pre-Submission Draft Local Plan (November 2017)

- 5.23 At the time of writing the Council are inviting representations to the above document. It reflects that housing needs are subject of a significant increase, compared to that which the adopted Local Plan makes provision for. Policy H1 of the pre-submission LP indicates that provision will be made for some 15,433 homes over the plan period, equating to an annual figure of 671 homes per annum, some 100 homes per annum greater than the level of housing the adopted LP provides for.
- 5.24 This figure does not however meet the Full Objectively Assessed Needs (FOAN) of Reading, which equates to some 699 new homes per annum, with Reading looking towards

neighbouring authorities within the West Berkshire Housing Market Area to meet the shortfall. The pre-submission LP explains that due to the constrained nature of Reading's administrative boundary in a tightly defined urban area where the availability of development sites is very limited it is unable to meet its OAN within its own boundaries. The target set in the emerging LP is however considerably higher than in the adopted LP and clearly more efficient use of previously development land and allocated development sites will be required to meet future needs. This includes sites like the application site.

- 5.25 This approach carries through into the emerging policy allocation of the site for housing development (WR3i). Whereas the adopted LP policy included as indicative yield for the site of between 45-95 dwellings, the emerging policy increases this to between 160-240 dwellings, or a density range of between 58dph-87dph.
- 5.26 As per the adopted Core Strategy, the emerging LP seeks 30% affordable housing unless viability considerations demonstrate that a lower affordable housing contribution is justified.

6.0 Planning Assessment

6.1 We have structured our assessment of the planning merits of the proposals in a manner which reflects the issues raised by relevant planning policies. Accordingly, this section is set out under the following headings and each will be discussed in turn:

- **Principle of Development;**
- **Design & Layout;**
- **Residential Mix and Tenure;**
- **Heritage and Archaeology;**
- **Highways & Parking;**
- **Trees & Landscaping;**
- **Ecology;**
- **Open Space;**
- **Flood Risk & Drainage;**
- **Sustainability; and**
- **S106 Contributions.**

Principle of Development

6.2 Policy SA8f of the SDPD indicates that the site should be developed for residential use. The proposed development is therefore entirely in accordance with the policy allocation. The land the subject of the application has long been identified for development. The length of time it has taken to come forward can be attributed to a number of factors including: the time taken to relocate occupiers of the site; the multiple ownership of the site; physical constraints including the need for costly decontamination of the site and policy constraints including policies which are prescriptive on housing mix, house types and density of development (Policies SA8f, DM5 and CS15).

6.3 In the intervening period the site has lain largely vacant, making no positive contribution towards the growing housing needs in Reading. In addition the buildings on-site have fallen into disrepair and suffered from incidents of trespass detracting from the visual appearance and amenity of the area.

6.4 As an allocated housing site, the site together with other allocated housing sites in the Local Plan forms an important part of the Council's housing land supply. Indeed the Council's 5yr

HLS anticipates a yield of 53 units from the application site over the next 5 years as one of 29 allocated sites which don't yet have planning permission which are similarly included and are expected to deliver some 1,847 dwellings over the next 5 years.

6.5 With the increase in the Council's OAN housing figure rising from 572dpa to 699dpa the delivery of housing from the Council's allocated housing sites is all the more pressing, not least in order to maintain a 5yr HLS which with the inclusion of the current OAN figure reduces the Council's HLS position from 8.64years (2017-22) to 5.83years (2017-22).

6.6 On this basis not only is the residential development of the site acceptable in planning policy terms its delivery will realise numerous benefits. The development of the site which is now in the hands of one of largest housebuilders in the country with a track record of delivering sites like these, will:

- Improve the character and appearance of the area;
- Regenerate the site and surrounding area;
- Boost the supply of a range of housing types to meet the needs of the local community;
- Help maintain the Council's 5yr HLS position in accordance with national policy.

Design and Layout

6.7 The Local Plan policy identifies a number of development criteria to be achieved in the design and layout of the scheme. These include that the site should be accessed from the south, rather than directly from Portman Road, which has been achieved in the submitted scheme.

6.8 In addition the policy seeks enhanced pedestrian and cycle permeability through the site including provision of a footpath/cycleway along the northern frontage of the site. The emerging LP policy allocation (WR3i) goes further indicating the need for a green link to be provided along the Portman Road frontage. The scheme provides for both including provision for a continuous 3m wide shared cycleway/footway extending the full width of the site within a green link with verges either side.

6.9 A further pedestrian/cycle access is proposed connecting Portman Way with Portman Road and connecting the south-west corner of the site with Valentia Road. A pedestrian link between the proposed open space and north-east corner of the site will further enhance the permeability of the site by non-car modes.

- 6.10 With regard to the siting of buildings and spaces within the site, the Planning Brief, albeit now very dated, advocates the enclosed perimeter block housing and the use of mews courts and courtyard developments to provide active and safe streets with traffic speeds reduced by design. Small parking courts should be well related to the dwellings they serve.
- 6.11 In accordance with the planning brief the use of perimeter block housing has been employed which address and overlook the access road. The road incorporates sharp changes in direction to naturally reduce traffic speeds and provide a safe environment attractive to pedestrians and cyclists.
- 6.12 The houses in the main body of the site range between 2-3 storeys in height. In accordance with pre-application discussions larger scale apartment buildings were deemed appropriate along the northern and western edges of the site. The building heights which rise from 3 storeys at the eastern end of the site to 6 storeys at the south-west corner provide an appropriate response to the busy Portman Road, providing a buffer and appropriate physical response to the road and the industrial scale buildings beyond.
- 6.13 The apartment building to the south-west corner at 6 storeys in height provides an appropriate point of transition to the 7 storey apartment building opposite on the Kings Oak scheme.
- 6.14 The scale of the apartment buildings are set in generous landscaped areas which provide relief but also serve as amenity areas for the future occupiers of the buildings. This includes the provision of a landscaped podium square adjacent to Block 1.
- 6.15 The visual impact of car parking has been limited by the use of undercroft parking, albeit this has been achieved while maintaining active ground floor frontages to three sides of the apartment buildings. Where they appear parking courts have been limited in size and located to be easily overlooked and well related in relation to the properties they serve.
- 6.16 The public open space area at the eastern end of the site will provide an attractive landscaped space accessible from all parts of the site and the surrounding area. It will also complement the provision found nearby at Battle Square.
- 6.17 In line with pre-application officer comments the design of buildings will be contemporary reflective of the design approach used in the Kings Oak scheme immediately to the south.

Apartment buildings are to be flat roofed to minimise bulk at roof level.

- 6.18 The density of development at c.77 dph is similar to that on the adjacent Kings Oak scheme c.78dph and comfortably within the range specified in the emerging LP policy allocation.
- 6.19 The houses will be provided with defensible space at the front of properties and each will have private garden areas and adhere to back to back standards which meet development plan policy requirements (DM4 & DM10).
- 6.20 Overall the scheme which incorporates comments and feedback received at the pre-application stage is of a high-quality design which responds positively to the design criteria in the adopted and emerging policy allocation SA8f and WR3i. The scheme proposals also accord with policies CS4, CS7, DM4 & DM7.
- 6.21 Further details of the scheme design are included in the DAS which accompanies the application.

Residential Mix and Tenure

- 6.22 As explained in section 4.0 above the application site provides a mix of 71% 1 and 2 bed apartments and 29% 3 bed apartments and houses. The proposals do not strictly meet the target contained in policy DM5, yet the policy allows for the consideration of all other material considerations. These which were rehearsed during the pre-application consultation with officers include the following:
- 6.23 As agreed with officers the site is located in a high density mixed-use area which is itself the subject of a number of constraints including noise impact from Portman Road, industrial uses opposite and the elevated railway line beyond. In physical terms the scale of building along the northern and western edges of the buildings need to respond to the large format buildings to the north-west and south and as agreed with officers the approach of providing apartment buildings, which in themselves will provide an appropriate visual response and buffer to the remainder of the site is the right approach.
- 6.24 In addition there is a recognition through the emerging Local Plan that more efficient use of development sites for housing will need to be made in Reading to meet future housing needs. The emerging policy allocation indicates the site should yield 160-240 new dwellings and the application proposals sit comfortably within that range.

- 6.25 Redeveloping the site in this manner which has been agreed is the right approach in design terms and responds appropriately to market demand for a site of this type in view of the applicants inevitably limits the amount of the site on which houses can be delivered and skews the mix towards apartments.
- 6.26 Nevertheless by increasing the density of development from that anticipated in the adopted SDPD, which expressed an upper indicative limit of 95 units, 50% 3 bed dwellings would equate to 48 units. By comparison the scheme proposed in the application will deliver 214 units of which 62 would have three bedrooms. Thus benefits will accrue in overall housing numbers which will include a significant number of 3 bed houses, with all of the housing proposed being of this size.
- 6.27 Policy H2 of the emerging LP seeks residential development that contributes towards meeting the needs of the needs identified in figure 4.6. The split of housing proposed in the application is measured against that in the table below:

Estimated size of dwelling size needed in Reading (SHMA 2016)

	1 bedroom	2 bedroom	3 bedroom	4 bedroom
Market	10.3	29.6	41.5	18.5
Affordable	43.4	32.9	21.6	2.1
Overall	18.6	30.5	36.5	14.4
Proposal	21	50	29	0

- 6.28 The table shows that the proposals make a positive contribution to meeting three of the four dwelling sizes needed in Reading. Clearly it would not be appropriate for each site to achieve the mix exactly and it would not be possible to introduce a blanket requirement across the whole borough, as noted in paragraph 4.4.9 of the pre-submission LP, as different sites, like this one, have different constraints and opportunities.
- 6.29 Accordingly the housing mix policy (DM5) needs to be applied flexibly. This was a point made in the Inspectors Report (IR) on the SDPD. Paragraph 48 and 49 of the IR notes that the desire of the Council to re-balance housing supply was not unreasonable, but its experience of high levels of smaller flatted development was not uncommon. The Inspector made it plain, that in line with comments expressed at the hearing by the Council, it was anticipated

that the policy should be applied flexibly, as 'starting point for discussion'.

- 6.30 Nevertheless when taken as a whole one can see that the greatest projected need is in the 2 and 3 bed category which represents 67% of the overall total. One can see that the application proposals perform particularly well in this category with 79% of total provision being made up of 2 and 3 bed dwellings. The application proposals will therefore make a very positive contribution towards meeting future housing needs in line with the types and size of dwelling expected to be of greatest need in the future.
- 6.31 It should also be borne in mind that the Synergy land when it comes forward will offer the potential to deliver more family sized housing. The dwellings shown ghosted on the application layout indicate 11no 3 bed houses and 2no. 2 bed coach houses can be provided on this land. This would have the effect of boosting the proportion of 3 bed dwellings to 32%.
- 6.32 As explained above policy CS16 of the adopted Core Strategy seeks 30% affordable housing, subject to viability considerations. In this case testing what level of affordable housing the scheme can viably sustain has commenced but has yet to have been completed. The ongoing process of agreeing the overall level of affordable housing, including tenure split, which the scheme can sustain will be concluded during the consideration of the application. Notwithstanding the ongoing viability discussions, **appendix 1.0** of this statement sets out the baseline position and relevant qualifying floor space to be considered for the purposes of calculating CIL deductions and Vacant Building Credits.

Heritage and Archaeology

- 6.33 The site is not located within a conservation area. The nearest listed buildings are located on Oxford Road with high rise development in between. As such there is no inter-visibility between the two sites. The proposed development would not therefore affect their setting.
- 6.34 The development plan allocation of the site indicates development proposals must take account of the potential archaeological significance of the site. However Reading Borough Council have advised at pre-application stage that previous archaeological investigations targeting the area of most potential within the site showed a significant depth of made ground within the area and it was concluded that there was no potential for archaeological remains to survive. Accordingly we have been advised that further archaeological investigations are not required within the site boundary.

- 6.35 In the light of the above it is considered that the site will have no significant effects on any designated heritage assets.

Highways and Parking

- 6.36 In accordance with the policy allocation access to the site will be from the south from Portman Way. This will allow for the closure of the existing access direct onto Portman Way, which was only ever approved on a temporary basis in any case. The closure of that existing junction will allow for the delivery of a green link and continuous pedestrian/cycleway from the north-east to north-west corners of the site along the Portman Road frontage in accordance with adopted policy SA8f and emerging policy WR3i.
- 6.37 The site occupies a very sustainable site being located a short distance from Oxford Road which provide access to numerous high frequency bus services. The site is also only approximately 800metres from Reading West railway station. There is an existing shared footway/cycleway on the northern side of Portman Road and a car club space is located nearby on Oxford Road. Oxford Road itself is a designated District Centre providing a wide range of retail, service and community facilities. The site is also within walking distance of locations for employment with commercial premises nearby along Oxford Road and to the north of the site which is a designated employment area.
- 6.38 The site clearly offers the opportunity for non-car modes of transport and is likely to be attractive to residents without access to a private car. To encourage walking and cycling and improve the permeability of the site, the proposals in addition to the Portman Road footway/cycleway mentioned above makes provision for similar provision linking Portman Way with Portman Road and the site to Valentia Road. A further pedestrian only link is also proposed at the north-eastern corner of the site which links Portman Road with the area of public open space provided at the eastern end of the site. There will also be an opportunity for the development to contribute towards the completion of the footway on the southern side of Portman Road which links with Cow Land Bridges
- 6.39 In line with officer comments at the pre-application stage residential parking has been provided by a mixture of on-plot provision, concealed undercroft parking, small parking courts and road side spaces. By this approach the visual impact of parking on the overall scheme has been limited. In view of the sustainable location of the site, as encouraged by officers, steps have been taken to assess the appropriate level of parking provision by reference to evidence of car ownership in the Battle Ward.

- 6.40 This research has shown that car ownership in Battle is one of the lowest in Reading. In view of this and the sustainable location of the site in transport terms a reduction on the Council's normal parking standards is considered appropriate. Accordingly parking for the apartments will be provided at a ratio of 0.92 spaces per apartment, compared to the Council's standard of 1 space per 1-2 bed apartment. The 3 bed houses proposed are to have at least 1.9 spaces per dwelling (with at least one allocated parking space and 0.9 unallocated spaces per dwelling). This is again very slightly under RBC's parking standard of 2 spaces per 3 bed house.
- 6.41 Given the highly sustainable location of the site and evidence of low car ownership in the local area this level of provision is considered to provide for the parking needs of the development without creating parking problems elsewhere. To make efficient use of the spaces proposed all the spaces for apartments are proposed to be unallocated, while over 50% of the total number of spaces proposed will be unallocated. Research has shown this arrangement avoids the situation where spaces are left unused due to being reserved for one particular property and leads to an inefficient use of spaces in communal parking locations.
- 6.42 The Travel Plan which is proposed to promote sustainable modes of travel will further discourage single occupancy car use and ownership. As described in more detail in the Transport Assessment which accompanies the application the traffic generated by the proposals are not anticipated to have a significant adverse or 'severe' impact on local highway conditions. Access arrangements are in accordance with policy requirements and will provide for safe, convenient access for all transport modes. Parking is proposed at a rate which will satisfactorily meet the parking needs of the development. For these reasons the application proposals accord with the relevant policies of the adopted development plan, most notably policy SA8f, CS23, CS24 and DM12.

Trees and Landscaping

- 6.43 Details of the tree and landscape proposals for the site are provided in the arboricultural impact assessment and DAS which accompanies the application.
- 6.44 In summary the trees on-site have been surveyed and found to be of mixed quality with only two category B trees, the remainder being category C or U. Of the category B trees the one covered by the TPO (Silver Birch, T46) will be retained. Other trees will be lost, but their loss can be mitigated by semi-mature tree planting as part of a comprehensive scheme of landscaping which will provide townscape improvements to the area and help integrate the new buildings with their surroundings. The proposed landscape strategy will include strong

avenues of boundary tree planting and along the main access road which will define key routes and aid legibility.

- 6.45 Tree planting will be accompanied by shrub and hedge planting to the public open space, podium deck and around the apartment buildings to provide attractive green amenity spaces for the benefit of future occupiers of the development and those who surround it. The application proposals accord with development plan policies CS7 and CS38.

Ecology

- 6.46 The application is supported by an ecological appraisal. This confirms that the site itself is not subject of any statutory or non-statutory ecological designations. In addition it is well separated from designated ecological sites in the area by existing development. The prospects of any trans-boundary effects are therefore very limited.
- 6.47 The site is dominated by existing buildings and hardstanding and the habitats present on-site are of negligible to low ecological value and the proposed losses are of negligible to minor ecological significance. Proposals for new tree and shrub planting will compensate for the proposed losses and new hedgerow planting and SuDS creation would provide ecological enhancements compared to the existing situation.
- 6.48 The habitats present on-site have poor suitability to support protected or notable species. Specific survey work in respect of bats and reptiles confirmed that reptiles are likely absent from the site and the buildings have negligible potential to support roosting bats. The proposed landscape planting scheme will provide new opportunities for a range of fauna.
- 6.49 The proposals therefore offer the opportunity to deliver net gains in biodiversity. For these reasons the application proposals accord with policy CS38 of the development plan and the NPPF.

Open Space

- 6.50 The site itself is well served by publicly accessible formal play space. It is very close to Battle Square to the south, Beresford Road Play ground to the east and the play area at Fulmead to the west. Further to the south is the considerably larger Kensington Park.
- 6.51 Nevertheless the application proposes an area of public open space at the eastern end of the site. This is supplemented by amenity areas around the apartment buildings and the podium

deck which will provide amenity space for the occupiers of the apartment buildings.

- 6.52 The open space areas will be maintained by a management company to ensure they are kept to a high standard for the benefit of future residents and the local community into the future. The proposals are therefore consistent with policy CS29 and policy DM16.

Flood Risk and Drainage

- 6.53 The Flood Risk Assessment which accompanies the application confirms the majority of the site lies within flood zone 2. As an allocated housing site in the development plan the sequential test does not need to be applied and neither does the exception test, as residential dwellings fall into the more vulnerable category and therefore are acceptable in flood zone 2.
- 6.54 It is proposed that surface water run off generated over the development area is managed via SUDS features which will comprise mainly of permeable paving and cellular storage tanks aimed at storing surface water run-off on-site prior to controlled discharge into the Thames Water network on Portman Road. These will be owned and maintained by either the individual house owners, a management company or Reading Borough Council.
- 6.55 It is proposed that a separate foul water system at the site connects into the existing sewer system network adjacent to the site. Thames Water own the drainage network in the area and have confirmed that there is existing capacity in their network to accommodate both foul and surface water run-off from the development. With these measures in place no significant effects on flooding, drainage or water resources are anticipated. Indeed the FRA shows the development can be accommodated on-site without increasing the risk of flooding and therefore accords with policy CS35.

Sustainability

- 6.56 Prior to construction, a SAP Assessment will be undertaken on the approved scheme. This will assist in understanding the necessary requirements to ensure that at least 50% of dwellings can achieve a 19% improvement in the dwelling emission rate over the target rate, as defined in the Building Regulations for England Approved document L1A: Conservation of Fuel and Power in New Dwellings (2013 edition), in order to accord with Local Plan policy CS1.
- 6.57 The applicants are well versed in meeting such requirements and it is envisaged that the 19% improvement can be secured through a fabric first approach by increasing cavity to

150mm, providing additional loft and floor insulation and where required, the utilisation of glazing with improved thermal performance (r values).

S106/CIL

6.58 The proposed development will be liable to make a non-negotiable CIL payment based on the Council's prevailing rates of £120 per square metre. The CIL payment will be used to fund infrastructure projects and government guidance is clear that any additional planning obligations should only be sought where these are site specific and necessary to mitigate the impacts of the development. They should not be sought where there is an overlap with generic infrastructure to be funded by CIL. This will ensure that the scale of obligations sought do not threaten the viability of the scheme and there is no actual or perceived 'double dipping'.

6.59 The S106 is anticipated to be restricted to the following heads of terms:

- Affordable housing;
- Access improvements;
- Employment, skills training;
- Laying out of public open space and provision for its maintenance.

7.0 Conclusions

- 7.1 The application proposals offer the opportunity to complete the final piece of the Battle Hospital Development area, in accordance with its longstanding allocation to deliver much needed housing.
- 7.2 The application proposals have been developed following a detailed and collaborative process of consultation with Council officers, stakeholders, statutory consultees and the local community. This has informed the submission comprising 215 dwellings, new access proposals from Portman Way, new footpath and cycle path provision improving the permeability of the site and a new area of attractive public open space.
- 7.3 In bringing forward a high quality new development on the site on this allocated housing sites will deliver a number of significant planning benefits including the following:
- The delivery of a range of housing types which make a significant contribution to meeting future housing needs, broaden the choice of housing available and widen opportunities for home ownership;
 - The proposals will provide an economic boost to the area both during and construction and in the post occupation phase of the development;
 - The proposals for 215 new homes will assist in maintaining the Council's 5 year housing land supply position in accordance with national policy;
 - The high-quality proposals will regenerate the site which is in a dilapidated and largely vacant state and enhance the character and appearance of the area;
 - The introduction of positive new uses, areas of open space and footpath/cycle links will create activity, invigorate the area, improve permeability which in turn provide opportunity for social interaction and healthy, inclusive communities, benefitting the amenity of the area;
 - The effective and efficient use of an allocated brownfield housing site, will deliver housing in a highly sustainable location where future residents will have high quality access to sustainable transport modes and traffic impacts will be limited;
 - Landscape and bio-diversity enhancements.
- 7.4 The scheme proposals do not strictly meet the objectives set in policy DM5 of the SDPD of providing 50% 3 bed housing. However in this instance other material considerations weigh in favour of supporting the proposals. In line with the emerging Local Plan, support is

indicated for making more efficient use of the Council's allocated brownfield housing site to keep step with evidence of increased future housing needs. The proposals respond positively to this, offering a development which sits comfortably within the indicative range outlined in policy WR3i of 160-240 and in density terms is consistent with the Kings Oak scheme to the south.

- 7.5 The design approach of providing apartment buildings to the north and western boundaries of the site also responds positively to the particular constraints of the site and is the outcome of close working with Council officers. The apartment buildings will provide an appropriate physical response to Portman Road and the scale of commercial buildings opposite to the north and the high-rise apartment buildings to the south. This however inevitably limits the space available to deliver 3 bed housing.
- 7.6 Nevertheless the proportionate shortfall in 3 bed dwellings when measures against adopted policy, is in this case, is more than outweighed by the benefits which this higher density scheme can deliver in overall housing numbers including 3 bed dwellings, the majority of which will be in the form of houses. As and when the Synergy land becomes available, further opportunity exists to deliver family sized housing at the site. All can this be achieved in the form of a high-quality scheme which is entirely appropriate to its surroundings and will not give rise to any unacceptable impacts.
- 7.7 The proposals will realise the long-standing policy aspiration to deliver housing on this allocated site, realising the considerable planning benefits outlined in this statement. The proposals should therefore be supported and planning permission be granted.

Appendix 1

Note by Bellway Homes Ltd (Thames Valley) on qualifying floor areas for CIL and VBC

Note by Bellway Homes Ltd (Thames Valley):

Baseline Position and Qualifying Floor Area's for CIL Exemption and Vacant Building Credit.

1 INTRODUCTION

- 1.1 The purpose of this note is to set out the details of the existing buildings on the Portman Road site which will be demolished as part of the redevelopment of the site, and seek to agree with Reading Borough Council the total qualifying floor space of the buildings which can be deducted from the CIL liability for the site.
- 1.2 Part of the site also qualifies for the application of Vacant Building Credit which is set out in detail below, demonstrating that the site already qualifies for a reduction (from Policy) in affordable housing based on the provisions set out within paragraphs 021 Ref ID: 23b to Paragraph 023 Ref ID: 23b of the Government's Planning Practice Guidance.
- 1.3 The site is identified on the attached plan, shown hatched green, red and yellow.
- 1.4 Bellway Homes Limited acquired the freehold interest in the site on 21st August 2017.

2 EXISTING ACCOMMODATION

- 2.1 The site comprises a range of different buildings, and can be split into three distinct parcels with varying uses and operations as shown hatched green, red and yellow on the plan shown at the end of this report.
- 2.2 The part of the property as shown hatched green on the attached plan contains a two storey office building known as Portman House, a single storey industrial building known as the Old Laundry Building and a single storey industrial building known as the Old Boiler House, which hosts a large chimney stack.
- 2.3 Prior to Bellway Homes acquiring the site in August 2017, Royal Berkshire NHS Foundation Trust have owned the site since 1st June 1993. We understand that the buildings on the land hatched green have been vacant for 5+ years, although managed and maintained as best has been possible given the persistent and relentless trespass that the site has experienced.
- 2.4 The part of the property hatched red contains a number of single, two storey office and warehouse buildings with associated storage, used by South Central Ambulance Service NHS Foundation Trust (SCAS) in connection with the maintenance of the ambulance fleet.
- 2.5 The land hatched red was owned and continuously used by SCAS from 10th July 2007 through to 21st August 2017 when Bellway Homes purchased the site. There is currently a lease in place between Bellway Homes and SCAS which expire on 21st August 2018.

- 2.6 The part of the property hatched yellow is the former Nurses Accommodation area, which comprises of 8 x 1 bedroom flats, 18 x 2 bedroom flats and 2 x 2 bedroom bungalows.
- 2.7 The nurses' accommodation area (hatched yellow) has been vacant since 20th August 2017, prior to that the accommodation was let on Assured Shorthold Tenancy basis and was in continuous use for housing NHS medical staff up until this time.
- 2.8 A table showing the extent of the floor areas is set out below, which equates to 10,532.92 sq.m. The measurements have been calculated in accordance with the RICS *Code of Measuring Practice (6th Edition)* and as set out in Haslams Report and Valuation 31st October 2017, as submitted to Reading Borough Council.

Part of the Property Shown Hatched Green

Unit	Quantity	Total Area (sq.m)	
GF Portman House	1	407.00	
FF Portman House	1	407.00	
GF Old Laundry Building	1	2,042.00	
GF Old Boiler House	1	728.00	
		3,584.00	

Part of the Property Shown Hatched Red

Unit	Quantity	Total Area (sq.m)	
GF Warehouse	1	2,379	NIA
Canopy	1	337.80	NIA
GF Store (1)	1	41.40	NIA
Tented Store	1	103.00	NIA
GF Store (2)	1	118.00	NIA
GF & FF Office	1	200.10	NIA
Workshop (1)	1	399.00	NIA
Workshop (2)	1	549.10	NIA
Workshop (3)	1	604.52	NIA
		4731.92	

Part of the Property Shown Hatched Yellow

Unit	Quantity	Total Area (sq.m)	
1 Bed Flats (no. 1-8)	8	393.60	NIA
2 Bed Flats (no. 9-26)	18	1,081.80	NIA
Bungalows (no. 27-28)	2	134.80	NIA
Communal Areas	1	606.80	NIA
		2217.00	

The buildings on the site benefit from a mix of lawful use classes, which are as follows:

- Nurses Accommodation – Class C3
- Offices – Class B1
- Industrial Laundry and Boiler House – Class B2
- South Central Ambulance Service – Sui Generis

3 QUALIFYING DEDUCTIBLE FLOOR SPACE

- 3.1 The criteria for calculating the existing floor space which can be deducted from the CIL Liability on site is set out in Reading Borough Councils Community Infrastructure Levy, Guidance for Applicants and Developers, February 2015 and in The Community Infrastructure Levy Regulations (as amended).
- 3.2 Existing floor space can be deducted from the calculation where the existing building has been in continuous lawful use for a period of six months in the last three years
- 3.3 The total CIL liability will be calculated pursuant to the grant of a planning permission for the site and calculated in accordance with the CIL Regulations.

Figure 1: Extract from 'Community Infrastructure Levy – Guidance for Applicants and Developers – February 2015'

Where any floorspace will be demolished or change of uses will occur A in the above formula for each type of proposed developed is calculated by:

$$G_R - K_R - \frac{(G_R \times E)}{G}$$

Where:

G = the gross internal area of the chargeable development

G_R = the gross internal area of the part of the chargeable development chargeable at rate R

K_R = the aggregate of the gross internal areas of the following—

- retained parts of in-use buildings, and
- for other relevant buildings, retained parts where the intended use following completion of the chargeable development is a use that is able to be carried on lawfully and permanently without further planning permission in that part on the day before planning permission first permits the chargeable development;

E = the aggregate of the following—

- the gross internal areas of parts of in-use buildings that are to be demolished before completion of the chargeable development, and
- for the second and subsequent phases of a phased planning permission, the value E_x , unless E_x is negative,

For phased planning permissions, E_x is calculated by:

$$E_P - (G_P - K_{PR})$$

Where:

E_P = the value of E for the previously commenced phase of the planning permission;

G_P = the value of G for the previously commenced phase of the planning permission; and

K_{PR} = the total of the values of K_R for the previously commenced phase of the planning permission.

The index (I) is the national All-in Tender Price Index published from time to time by the Building Cost Information Service of the Royal Institution of Chartered Surveyors; and the figure for a given year is the figure for 1st November for the preceding year.

A building is in use if a part of that building has been in use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development.

4 CIL CALCULATION AND WORKED EXAMPLE

- 4.1 We have provided a worked example below based on applying the reduction of existing qualifying floor space in line with the criteria set out in the Community Infrastructure Levy, Guidance for Applicants and Developers, February 2015.
- 4.2 The worked example below is based on indicative floor areas which will be confirmed through the submission of a planning application for the site, and are used only for the purposes of demonstrating the qualifying amount of floor space which can be deducted from the CIL calculation in accordance with the CIL Regulations and Reading Borough Councils, Community Infrastructure Levy, Guidance for Applicants and Developers, February 2015.

Worked Example – Reduction of Existing Qualifying Floor Space

- Chargeable GIA proposed floor space (G) = 23,575.m
- Chargeable GIA proposed floor space of part of the property (G_R) = 23,575 sq.m
- Aggregate GIA of retained parts of the property (K_R) = 0sq.m
- Aggregate GIA of parts of the property in use to be demolished = 6,948 sq.m

$$G_R - K_R - \frac{(G_R \times E)}{G}$$

$$23,575 - 0 - \frac{(23,575 \times 6,948)}{23,575}$$

$$\frac{23,575 - (163,799,100)}{23,575}$$

$$23,575 - 6,948$$

Qualifying Floor Area = **16,627 sq.m**

- 4.3 This therefore equates to a qualifying floor space of 16,627 sq.m which will be the chargeable development under the CIL Regulations (this figure is indicative and does not represent what the eventual approved scheme might comprise of).
- 4.4 A discount of 6,948 sq.m of existing floor space is therefore applicable to the development site, and can be deducted from the CIL calculation.
- 4.5 Further Social Housing Relief may also be applicable in accordance with the Cil Regulations 2010 (as amended).

5 VACANT BUILDING CREDIT

- 5.1 Details of Vacant Building Credit can be found within National Planning Practice Guidance (NPPG) <http://planningguidance.communities.gov.uk/blog/guidance/planning-obligations/planning-obligations-guidance/> (see from para 21). This sets out that the existing

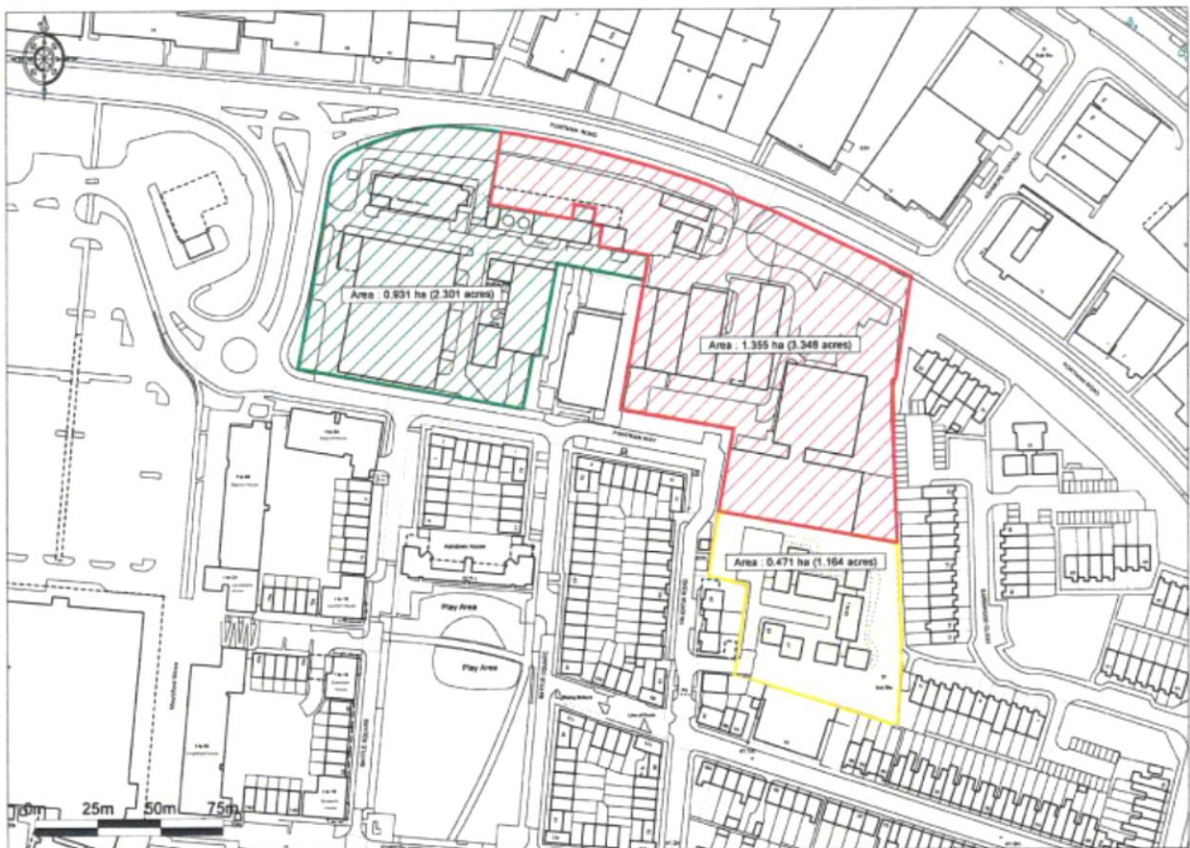
floor space of a vacant building(s) should be credited against the floor space of new development when considering the provision of Affordable Housing.

- 5.2 The example set out with in the NPPG illustrates that where a building with a gross floor space of 8,000 square metre building is demolished as part of a proposed development with a gross floor space of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought.
- 5.3 It further continues that...the policy is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. In considering how the vacant building credit should apply to a particular development, local planning authorities should have regard to the intention of national policy.
- 5.4 In the case of the Former Battle Hospital, Portman Road, the buildings identified in the hatched green area meet with the necessary criteria to benefit from VBC as they are vacant, but unlike the areas hatched red and yellow, they have not been made vacant for the sole purposes of re-development having sat vacant for a number of years now. Also, through the development proposals, the site will be brought back into use through demolition of the redundant buildings and the erection of high quality, purpose built residential accommodation.
- 5.5 On the basis of the above it is considered that VBC policy is applicable to the Battle Hospital site on Portman Road, Reading.
- 5.6 Taking into account the qualifying existing floor area, which totals 3584 sq. metres (as set out in within section 2 of this report), the floor space of the existing buildings equates to a 15.2% of the proposed 23,575 sq.m floor area, in which case the 30% policy compliant level of affordable housing should be reduced by 15.2% accordingly.
- 5.7 Under the current proposals for 215 units, the 30% affordable provision equates to 64.5 units.
- 5.8 Applying a 15.2% vacant building credit, which equals 9.8 units, gives a requirement for 54.7 units across the scheme, or 25.4%.

6 CONCLUSION

- 6.1 We believe that the site at Portman Road, Reading can be afforded with 6,948 sq.m of qualifying floor space to be deducted from the CIL Liability calculation as a result of the land hatched red being in lawful use for a period of 6 months within the last 36 months.
- 6.2 The total financial CIL Liability will be calculated based on a Planning Permission for the site however, the above seeks agreement with Reading Borough Council to the floor space which can be deducted as set out above.
- 6.3 We believe that Vacant Building Credit is also applicable to the site as set out in 5 above.
- 6.4 The Vacant Building Credit application results in a reduction of affordable housing provision to 25.4%

Land at Portman Road, Reading, Berkshire RG30 1AH



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