



RIDGE

**PLANNING STATEMENT IN
SUPPORT OF A SECTION 73
APPLICATION FOR LAND AT
WELDALE STREET
FOR ROPEMAKER PROPERTIES
LTD**

July 2019

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Prepared for

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1. INTRODUCTION

- 1.1. This Planning Statement has been prepared by Ridge and Partners on behalf of Ropemaker Properties in support of a section 73 application on land at Weldale Street, Reading.
- 1.2. Planning permission was granted in March 2018 for the *“Demolition of all existing buildings (including 3 retail units) and structures, and erection of new buildings ranging between lower ground & 4 storeys to lower ground & 11 storeys in height, providing 427 (233x1, 182x2 & 12x3-bed) residential units (Class C3) and 1 flexible ground floor retail shop (Class A1) or restaurant and cafe (Class A3) unit, together with new public realm, landscaping, accesses, parking and associated works”*
- 1.3. This application seeks to amend condition 2 of the above permission, which is the plans list. A number of minor alterations are proposed to the original permission including the introduction of amenity space, the loss of a small number of flats and elevational changes to support the internal amendments.
- 1.4. This report details the site and surrounding area before describing the proposed amendments to the permitted scheme. Section 4 considers any changes to planning policy since the determination of the original application, before section 5 focuses on the key planning issues. Section 6 outlines the key technical reports which accompanied the original application and considers whether they need to be updated or if the conclusions are still relevant. The conclusions are set out within section 7.
- 1.5. This statement should be read in conjunction with the proposed amendments to conditions set out in Appendix 1 of this report, together with the Plans and updated Design and Access Statement prepared by AWW Architects.

2. SITE AND SURROUNDING AREA

- 2.1 This section describes the site as it is currently and looks at the wider area as well as the planning history for the application site and surrounding area.

Site Description

- 2.2 The Application Site measures approximately 1.32 hectares and is located within the administrative borough of Reading Borough Council. The site occupies a prominent location adjacent to the Inner Distributor Road (IDR). The existing site comprises low rise retail development.
- 2.3 On the eastern side of the site, adjacent to the boundary is a three-storey retail unit which is currently vacant. Along the southern boundary is a warehouse unit formerly occupied by Wickes but also now vacant. Along the northern boundary of the site is a unit formerly occupied by Iceland Supermarket with associated servicing area.
- 2.4 The western half of the site is currently a car park with deck level. Vehicular access into the site is via Weldale Street with the exit onto Chatham Street.
- 2.5 To the south of the built form is a triangular area of land owned by the Borough Council, this is currently in a poor condition with some tree planting on it. This area provides a public footpath and access to the existing zebra crossing for pedestrians crossing the IDR to reach the town centre.
- 2.6 The levels vary across the site slope rise up from north to south with Chatham Street sitting at a significantly higher level than Weldale Street. The whole site has a very tired appearance and clearly has the potential for regeneration.

The Wider Area

- 2.7 The site is located within the urban area. The IDR lies to the east of the application and is a busy dual carriageway and a main artery route through the site. This results in a barrier between the application site and the town centre.
- 2.8 Adjacent to the site on the north east corner is a block of flats, up to 5 storeys in height. To the south of the application site is the A329 (Chatham Street), which sits at a higher level than the application site and the recently completed mixed use Chatham Street development which contains a 19-storey residential tower and 9 storey tower with multi-storey car park.
- 2.9 To the west of the application site is Stratheden Place, a residential development of 2 and 3 storey dwellings. On the boundary with the application site are garages and the parking area for these properties. These properties are accessed off Weldale Street.

- 2.10 To the north of the application site on the opposite side of Weldale Street are a number of industrial units, these vary in height from 1-2 storeys and sit at a lower level to the application site.

Accessibility

- 2.11 The application site is in a highly sustainable location close to the centre of Reading. The main town centre is within walking distance and there are a substantial number of footpaths and cycle routes into the town centre and beyond with a number of opportunities to safely cross the IDR in close proximity to the site.
- 2.12 Reading Railway Station is approximately a 10-minute walk. This provides direct trains to London in 25 minutes as well as trains, north, west and south. From the train station there are direct buses to Heathrow Airport. In December 2019 Crossrail is due to come to Reading. This will further increase accessibility east-west across London.
- 2.13 In addition to this, there is an extensive regional and local bus route with the nearest stops located at Caversham Road fire station, Waylen Road and Friar Street.

Site Constraints and Opportunities

- 2.14 The application site is located within the settlement boundary and Reading Central Area although outside of the central core. The site sits within the West Side Major Opportunity Area as identified by the Reading Central Area Action Plan. The site is also in an Air Quality Management Area.

Planning History

- 2.15 Planning permission was subsequently achieved on the site (ref: **170326**) in March 2018 for:
- Demolition of all existing buildings (including 3 retail units) and structures, and erection of new buildings ranging between lower ground & 4 storeys to lower ground & 11 storeys in height, providing 427 (233x1, 182x2 & 12x3-bed) residential units (Class C3) and 1 flexible ground floor retail shop (Class A1) or restaurant and cafe (Class A3) unit, together with new public realm, landscaping, accesses, parking and associated works (amended description).*
- 2.16 Since, this time a non-material amendment application has been permitted (ref: **190793**) for:
- Non-material amendments to permission 170326 (granted on 15/03/2018) to amend the wording of conditions 15, 34 and 43 to allow details to be submitted on a phase-by-phase basis and amend the wording of condition 32 to allow archaeological works to take place via an agreed timetable rather than pre-commencement (amended description).*
- 2.17 A number of applications have also been submitted to discharge pre-commencement conditions on the site, which at the time of writing are pending consideration.

3 PROPOSED AMENDMENTS TO THE PERMITTED SCHEME

- 3.1 Following the grant of planning permission 170326, the applicant has been working on the detailed design to enable them to build out the scheme themselves.
- 3.2 During the detailed design process, it has become clear that amendments are desirable to better meet not only statutory regulations, but also the changing demands and preferences of the market.
- 3.3 As such, this application seeks to amend the approved plans set out in condition 2 of application 170326. This condition stated: *The development hereby permitted shall be carried out in accordance with the plans listed below.*
- 3.4 The alterations relate to the internal layout with the introduction of amenity space in the form of a residents lounge/ screening area. This in turn results in a very small reduction of the number of flats within block A2 from 114 to 109 to accommodate the amenity space. The proposed internal arrangements also incorporate some amendments to the lobby on the ground floor with an enlarged reception area and a manager's office for the site. In addition, the locations of the plant and boilers have been rationalised across the site and one parking space has been lost. Within block A1, some of the units have been rearranged for better co-ordination with the structural and M&E co-ordination and the lobby within A1 has been slightly reduced in size.
- 3.5 The external changes proposed are due to the amendments to the internal layout. Most notable are the proposed amendments to entrance lobby on the east elevation of A2 with the introduction of double height windows. In addition, within the courtyard on the west elevation of block A2, double height windows have been introduced where the proposed amenity space is to be located. More generally across blocks A1 and A2, windows have been altered due to the rationalisation of the internal layout. Changes are also proposed to the west elevation of block A1, which has seen amendments made to the roof to suit the rainwater strategy.
- 3.6 No changes at all are proposed to blocks B1 and B2.
- 3.7 Within the accompanying table, regard has also been had to the wording of conditions in light of pre-commencement conditions already discharged on the site.
- 3.8 For clarity and completeness this application, also proposes to amend the wording of conditions varied as part of a non-material amendment application, or to update those conditions already discharged.
- 3.9 Full details of the proposed amendments are set out in the accompanying Design and Access Statement prepared by AWW Architects.

4 PLANNING POLICY POSITION

- 4.1 This section considers any changes to planning policy since the determination of the original application in March 2018. The main change since this time is the reissuing of the National Planning Policy Framework (February 2019). Furthermore since, the determination of the original application the New Local Plan has been submitted to the Secretary of State for examination. This has recently been the subject of the main modification's consultation (ended 24th July 2019) and it is anticipated the Plan will be adopted in October 2019.

Section 73 Applications

- 4.2 Section 73 of the Town and Country Planning Act 1990 allows an applicant to vary or remove conditions associated with a planning application. The guidance is very clear that a Section 73 Application cannot be used to extend the time limit within which a development must be started or an application for approval of reserved matters must be made.
- 4.3 The Planning Practice Guidance sets out that *"there is no statutory definition of a 'minor material amendment' but it is likely to include any amendment which is not substantially different from the one which has been approved"* (reference ID: 17a-017-20140306).
- 4.4 In respect of the proposed amendments set out in section 3 of this statement, these are considered to be minor. It should be acknowledged that the footprint, scale and massing of the buildings all remain the same and no changes are proposed to the timescale for implementation.
- 4.5 As such the proposals are considered to fall well within the remit of a Section 73 application.

The Development Plan

- 4.6 At the time of writing, the Development Plan for Reading remains the Core Strategy, Central Area Action Plan and Sites and Detailed Policies DPD. As this is the same, as the policies on which the original application was determined on, it has not been considered further within this section, although reference is made to relevant policies within section 5 of this Statement.

National Planning Policy Framework (NPPF)

- 4.7 The NPPF was revised and updated in February 2019. This sets out the Governments Planning Policies for England and how they are expected to be applied.
- 4.8 **Paragraph 7** sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. **Paragraph 8** sets out that the planning system has three overarching objectives which are interdependent and needs to be pursued in mutually supportive ways; these are economic, social and environmental.

- 4.9 **Paragraph 10** is clear that so that sustainable development is pursued in a positive way, at the heart of the framework is a presumption in favour of sustainable development. For decision taking, **paragraph 11** is clear this means approving development proposals that accord with an up to date development without delay.
- 4.10 Where relevant, specific paragraphs and chapters are referred to within section 5 of this statement.

Emerging Planning Policy

- 4.11 The emerging Local Plan will eventually replace the Core Strategy, Central Area Action Plan and Sites and Detailed Policies DPD. It will cover the period up to 2036. At this time, it is not anticipated that the new Local Plan will be adopted until at least October 2019.

4 CONSIDERATION OF PLANNING ISSUES

- 5.1 The determination of application 170326 in March 2018 has established the principle of residential development on the site. It also determined the scale and bulk of the residential development proposed. The application does not seek to alter the footprint, scale or massing of the building. The majority of amendments proposed are internal alterations, with some minor elevational changes to reflect the revised layout and other matters that have arisen during the detailed design process.

Housing Mix and Numbers

- 5.2 This section 73 application looks to reduce the number of dwellings on the site from 427 to 422. This is to allow for the introduction of amenity space into the lower ground floor of block A2 together with an enlarged reception area. The justification for the amenity space is provided in the section below.
- 5.3 Given the scale and density of development, the reduction in 5 units is considered to be negligible. The overall density of development would reduce from 323dph. to 320dph. This is still well above the minimum target of 70dph set out in policy CS15 of the Core Strategy. In light of this, the proposals are considered to represent an effective use of a brownfield site as set out in paragraphs 122 and 123 of the NPPF.
- 5.4 In terms of the mix of units, the permitted scheme, has a mix of 54.57% 1 beds, 42.62% 2 beds and 2.81% 3 beds. The proposal seeks a reduction of 2 x 1 beds, 2 x 2 beds and 1 x 3 beds. This equates to a revised mix of 54.74% 1 bed, 42.65% 2 beds and 2.61% 3 beds. As can be seen, the mix of units is almost exactly the same as previously permitted with any change considered to be negligible. No change is proposed to the mix of affordable units. The previously application was accompanied by a detailed report on Market Demand and Mix together with the viability assessment. As the mix is broadly as previously permitted, this is considered to be acceptable. It is worth noting, that policy RC9 is to be used as a guide rather than a rule.
- 5.5 Overall, the proposed amendments are considered to have a negligible impact on the previously approved density and mix of development. As such, the amendments accord with the provisions of the Development Plan.

Affordable Housing

- 5.6 The original application was determined on the basis of an affordable housing provision of 43 units (10.07%) following extensive viability discussions. Despite a proposed reduction in the number of market dwellings proposed, it is not the applicant's intention to seek a reduction or to amend the mix of the previously agreed affordable housing provision on the site. As such, given the extensive

viability discussions which took place on the original application, it is considered that the Section 73 Application accords with the provisions of policy CS16 of the Core Strategy.

Provision of Amenity Space

- 5.7 The key change to the development proposals is the proposed introduction of amenity space within the lower ground and ground floor of block A2. This includes the introduction of a gym, flexible screening area and lounge all of which would provide direct access into the courtyard. On the ground floor, it is proposed to have an enlarged reception area with seating. The application as currently permitted provides high quality courtyards between the buildings as well as significant public realm improvements surrounding the buildings. It is considered that the proposed amenity space will complement the existing outdoor space providing the occupiers of the building with spaces which can be used all year round.
- 5.8 The NPPF at paragraph 91 sets out that planning policies and decisions should aim to achieve healthy, inclusive and safe communities which promote social interaction including opportunities for meetings between people who might not otherwise come into contact with each other; enable and support healthy lifestyles. The addition of amenity space within the scheme will allow for increased interaction and provide residents with additional multi-functional space which can be used all year round.
- 5.9 It is noted that, some of the ancillary areas associated with the development have been re-sited so that they can better serve the future residents of the site. This has come to light during the detailed design process.

Daylight and Sunlight

- 5.10 It is acknowledged that the proposed alterations to the internal layout may have an impact on the results of the daylight/ sunlight assessment previously provided as some of the units have been relocated. As a result, the daylight/ sunlight assessment has been updated as part of the section 73 application. In summary the proposed amendments to blocks A1 and A2 do not have any significant effects on the results reported in the previous application. As a result, the proposal accords with policy DM4 of the Development Plan.

External Alterations

- 5.11 A small number of external alterations are proposed in light of the internal alterations. These are not considered to be significant but include slight adjustments to some of the window positions on blocks A1 and A2. Alterations to the entrance doors on block A2 and the creation of doors out onto the courtyard to provide direct access from the proposed amenity area. On the west elevation of block A1, it is proposed to make amendments to the roof to suit the rainwater strategy and for a

rationalisation of windows on this elevation. Policy RC5 covers design in the centre and policy CS7 looks at design. This policy sets out that *“all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located”*. The proposed elevational amendments are minor in nature and indeed could be considered non-material, if there were no internal alterations. As such, the proposal is considered to accord with the Development Plan.

Parking Requirements

- 5.12 The proposed application seeks to slightly alter the layout of the parking spaces under the proposed podium. The reason for this is due to the re-organisation of some of the ancillary areas such as the bin and cycle stores. It should however be noted that there is no reduction in the number of cycle spaces or refuse bins.

6 REVIEW OF OTHER TECHNICAL REPORTS

- 6.1 As part of the original application detailed technical reports accompanied the application. This section has reviewed the reports submitted as part of the original application and commented where necessary on any updates that are required.

Geo-technical Reports

- 6.2 The main application considered the following geo-technical reports:
- Geotechnical and Geo-Environmental Preliminary Risk Assessment
 - Phase II Geo-Environmental Ground Investigation Report prepared by Fairhurst
- 6.3 The application was accompanied by two detailed reports in relation to existing ground conditions on the site and potential mitigation. When the decision was issued, appropriate conditions were attached to the permission requesting further information in respect of contamination. Following the grant of permission on the original consent, additional testing has been undertaken as to the ground conditions of the site. As it currently stands, conditions are currently being considered in relation to ground conditions.
- 6.4 The footprint of the proposed development will not be altered as part of the section 73 application. As a result, the conclusions reached within this report and the subsequent discharge of condition information submitted will not be altered and are therefore still relevant.

Heritage and Archaeology

- 6.5 The main application considered the following documents in relation to Heritage:
- Heritage Statement prepared by Heritage Collective
 - Archaeological Desk Based Assessment prepared by Archaeology Collective
 - Historic Views Study prepared by AWW Architects
- 6.6 Having regard to the above, the proposals will have no impact on the scale/ bulk of the buildings within the site. As such, the conclusions reached within the above reports are still relevant to the Section 73 application.
- 6.7 It is also worth noting that since the determination of application 170326, the archaeology condition relating to the Written Scheme of Investigation has been discharged.

Retail Sequential Test

- 6.8 The main application considered the following documents in relation to the Retail Sequential Test:

- Update to the Retail Sequential Test prepared by Hunter Page Planning

6.9 The proposals do not seek to make any alterations to the permitted retail unit. As such, the conclusions reached in the submitted Retail Sequential test are still relevant.

Ecology

6.10 The application was submitted with the following documents:

- Ecological Assessment prepared by Ecology Solutions

6.11 The assessment concluded that there was no evidence of badgers or bats within the site, and it was not considered that the proposals would have an effect on any statutory or non-statutory sites. The report also suggested several ecological enhancements, which have been incorporated into the landscaping conditions, which formed part of the original permission.

Flood Risk Assessment and Drainage Strategy

6.12 The application was accompanied by the following documents:

- Flood Risk Assessment incorporating Drainage Strategy prepared by Fairhurst

6.13 The original Flood Risk Assessment set out that the site is in flood zone 1 which is at the lowest risk of flooding. Following discussions and agreement with Thames Water, it is proposed to discharge into the existing public sewer at a reduced rate. It is also proposed to incorporate SUDs features into the site which will represent betterment over the existing arrangement. The Section 73 application does not seek to make any amendments to the siting or size of the existing building. As such, the conclusions reached in the original report are still relevant to the Section 73 Application.

Landscape incorporating Open Space

6.14 The application was accompanied by the following documents in relation to landscape and open space:

- Landscape Principles incorporating open space prepared by Cameo and Partners
- Associated Landscaping Plans listed on the decision notice

6.15 The relevant plans have been updated to reflect the changes to the entrance area and minor alterations within the site. The Landscape Principles document prepared as part of the original application is considered to still be relevant to the amended scheme as it seeks to follow the principles identified within this document.

Daylight/ Sunlight

6.16 The original application was accompanied by the following documents:

- Daylight and Sunlight Assessment prepared by Hydrock

6.17 It is acknowledged that some of the window positions have changed from the original application. As such, the daylight/ sunlight report has been updated to reflect the amendments made to the proposed residential units. It should be acknowledged that this update focuses on the differences between the two schemes.

Wind

6.18 The original application was accompanied by the following documents:

- Wind Study prepared by K8t and associated clarification documents

6.19 During the course of the previous planning application, extensive information was provided in relation to wind. The proposals do not seek to alter the overall scale, bulk or mass of the buildings previously permitted. As a result, it is considered that the conclusions previously reached are still relevant to this Section 73 Application.

Transport Assessment and Travel Plan

6.20 The main application considered the following documents in relation to highways:

- Transport Assessment Prepared by Phil Jones Associates
- Framework Travel Plan prepared by Phil Jones Associates

6.21 The proposed access routes to the highway will remain as permitted. The only change from the approved scheme is a slight re-organisation of the parking layout to accommodate amendments to the refuse and cycle stores. As a result, the conclusions previously reached are still relevant to the Section 73 application.

Other Technical Reports

6.22 A suite of other technical reports accompanied the application including:

- Ventilation Strategy prepared by Hydrock
- External Lighting Statement prepared by Hydrock
- Utility Statement prepared by Hydrock
- Air Quality Assessment prepared by Hydrock
- Sustainability Strategy prepared by Hydrock
- Noise Planning Report prepared by Hydrock

- 6.23 These documents have been reviewed and the conclusions previously reached are still considered relevant to the section 73 application.

Section 106 Matters including Affordable Housing

- 6.24 The application was permitted subject to the signing of a Section 106 Agreement, subject to several provisions including affordable housing. This included following detailed viability assessment an affordable housing provision of 43 units to be provided in block B2. Despite a reduction in units being proposed, the applicant is proposing to retain the affordable housing offering as previously agreed
- 6.25 The other schedules within the Section 106 agreement remain relevant to the proposals and as a result, it is not intended to re-open the section 106 discussions as part of the section 73 application. However, it is acknowledged that a deed of variation may need to be signed.

7 CONCLUSIONS

- 7.1 This Planning Statement has been prepared by Ridge and Partners on behalf of Ropemaker Properties in support of their Section 73 application on Land at Weldale Street, Reading.
- 7.2 The Planning Practice Guidance sets out that “there is no statutory definition of a ‘minor material amendment’ but it is likely to include any amendment which is not substantially different from the one which has been approved” (reference ID: 17a-017-20140306).
- 7.3 The proposed amendments are considered to be minor in nature with the reduction in the numbers of units negligible and little change to the density or originally approved development mix. The affordable housing provision would remain as previously approved despite a reduction in the overall unit numbers. The addition of amenity space for occupiers of the building will promote greater social interaction and will complement the existing courtyard provision within the development. There is no sense in which the amended scheme could be regarded as “substantially different” from that which has been permitted.
- 7.4 The external alterations and amendments to the parking layout are considered to be non-material.
- 7.5 Overall the proposed amendments are considered to be in line with the PPG guidance on section 73 applications and the proposals are considered to meet the requirements of the Development Plan. It is therefore requested that permission is granted without delay.



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