



Stantec UK Limited
The Blade, Abbey Square
Reading
RG1 3BE
UNITED KINGDOM

2nd April 2025

Project/File: 333101170

A. Amoah
Ms. A. Amoah,
Planning - Development Management
Reading Borough Council Civic Offices
Bridge Street
READING
RG1 2LU

VIA PLANNING PORTAL: REFERENCE: PP - 13733408

Dear Alison,

SECTION 96A APPLICATION FOR A NON-MATERIAL AMENDMENT IN RELATION TO PLANNING APPLICATION REFERENCE 160199 - ROYAL ELM PARK

On behalf of our client RFC Prop Co Ltd, we are pleased to submit via the Planning Portal details for a Section 96A application (Non-Material Amendment) to planning permission at Select Car Leasing Stadium, Shooters Way, Reading, RG2 0FL (Application reference: 160199).

Following ongoing engagement with yourself as Case Officer with a meeting on 14th November 2024 and 13th March 2025, and email dated 28th March 2025, our client seeks to make minor changes to the extant permission.

The changes proposed as part of this application are as follows:

- Alteration to Condition 7;
- Alteration to Condition 46;
- Alteration to Condition 50;
- Deletion of Condition 57;

In support of the changes proposed, this application is accompanied by the following material:

- Appropriate Fee;
- Covering Letter;
- Application Form; and

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- Proposed minor alterations to the listed conditions (see **Appendix 1**)

The reason that we are seeking these changes is multi-fold and set out below:

Condition 7: To update the condition wording to refer to updated guidance and standards, including the removal of reference to Site Characterisation CS2, as discussed on 12th November 2024 with your consultant Tweedie Evans Consulting, and agreed on 13th January 2025.

Condition 46: To amend the trigger point so that the condition requirements concerning the assessment of contamination and the assessment of potential risks is aligned with Condition 3 from the detailed part of the permission. This, as discussed in our meeting on 14th November 2024 and agreed via email on 13th January 2025 supports our client's intention to bring forward the first reserved matters application in accordance with Condition 40, which requires that the first reserved matter to be made no later than 7 years from the date permission was granted (29th November 2025). As agreed via email on 28th March 2025, this proposed amendment aligns with the requirements of Condition 3 and maintains that prior to any commencement of the outline parts of the development, the information required by the Condition wording is required to be submitted to and approved by Reading Borough Council.

Condition 50: To update the condition wording references to refer to updated guidance and standards, including the removal of reference to Site Characterisation CS2, as discussed on 12th November 2024 with your consultant Tweedie Evans Consulting, and agreed on 13th January 2025.

Proposed variation to part b and c (i) to include reference to any phase or part of phase and therefore align the condition with Condition 7 c (i).

Condition 57: To delete duplicated planning condition covered by Condition 55. It is suggested that a note is added below the deleted planning condition to confirm that all other condition numbering does not change.

The proposed changes do not alter the approved development but aim to update the conditions to take into account the latest technical guidance regarding site characterisation and to ensure the conditions subject to this application remain capable of meeting the relevant tests. Therefore, please see in **appendix 1** table which sets out the proposed amended wording to the conditions.

In summary, we consider the proposed amendments to constitute a Non-Material Amendment for the following reasons:

- The changes made do not materially change the existing permission;
- The changes proposed do not alter any reports or other documentation previously submitted in relation to application 160199;

The changes do not alter the substance of the Conditions required for each complete phase or part of phase of the development. The NMA application fee has been paid directly to the Planning Portal.

We trust the Council has sufficient information to register and determine the enclosed application and look forward to receiving written confirmation of this shortly

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In the meantime, if you require any additional information, please do not hesitate to contact me.

As per our discussions and emails referenced throughout this covering letter, a Deed of Variation is also required to two clauses within the Section 106 to align with amendment proposed to Condition 7 and 50. I will write to you separately in this regard,

Yours sincerely,

Stantec UK Limited

A handwritten signature in black ink, appearing to read 'Caitlin Daly', is positioned above a thin red horizontal line.

Planner
Caitlin.daly@stantec.com

Reference: 160199

Appendix 1 – Proposed amended condition wording

Condition	Approved condition wording ¹	Proposed amendments
7	Long Term Management, Monitoring and Maintenance a) Ground Gas Prior to implementation of the development a management plan shall be submitted to and approved in writing by the Local Planning Authority setting out the: • Frequency and type of monitoring of ground gases to be undertaken to include on and off site gas migration; • Frequency and method of reporting the results; • What remedial actions will be taken in the event of results or readings showing a worsening of earlier readings. The monitoring, reporting and consequent management of ground gas shall be undertaken in accordance with the approved plan, prior to, during and post construction and until the waste is unlikely to present a hazard to human health, i.e. when monitoring demonstrates that the site Characterisation CS2 has been reached (demonstrated by the results of a minimum of 24 datasets over two consecutive years at this level). b) Gas Mitigation Measures Prior to construction a management plan shall be submitted to and approved in writing by the Local Planning Authority. This will set out the: • Proposed gas mitigation measures for the buildings;	Long Term Management, Monitoring and Maintenance a) Ground Gas Prior to implementation of the development a management plan shall be submitted to and approved in writing by the Local Planning Authority setting out the: • Frequency and type of monitoring of ground gases to be undertaken to include on and off site gas migration; • Frequency and method of reporting the results; • What remedial actions will be taken in the event of results or readings showing a worsening of earlier readings. The monitoring, reporting and consequent management of ground gas shall be Undertaken by a 'competent person', as defined in Land Contamination Risk Management LCRM: Before you start - GOV.UK, in accordance with the approved plan, prior to, during and post construction, but prior to occupation, and until the waste is unlikely to present a hazard to identified critical receptors in the context of the proposed development ~~to human health, i.e.~~ when monitoring demonstrates that the site has been appropriately assessed in accordance with current guidance, such as the Environment Agency's (LCRM) guidance and that the Ground Gas risks have been characterised in accordance with the approaches outlined within British Standards and where appropriate, other current, relevant, authoritative guidance. ~~Characterisation CS2 has been reached (demonstrated by the results of a minimum of 24 datasets over two consecutive years at this level).~~ b) Gas Mitigation Measures Prior to construction a management plan shall be submitted to and approved in writing by the Local Planning Authority. This will set out the: • Proposed gas mitigation measures for the buildings; • Type and frequency of monitoring and recording of gas levels within buildings;

¹ Taking into account any wording amended by the following Non Material Amendment Application References 221914, 230079, and 231266

	• Type and frequency of monitoring and recording of gas levels within buildings; • Operations and maintenance procedures, including the method of reporting (including incidents), replacement of mitigation measures, detection systems and the corrective actions which would be implemented in the case of the failure of the identified mitigation measures. The monitoring, reporting and management shall be undertaken in accordance with the approved plan. Should detailed design of each phase of the development require changes to the approved management plan then an amended plan shall be submitted to and approved in writing by the Local Planning Authority, prior to the occupation of a phase. c) Management Company (i) Prior to construction details of the company, including their level and type of experience, who will be employed to undertake the monitoring, reporting, management and maintenance requirements in accordance with the plan approved under 7a, shall be submitted to and approved in writing by the Local Planning Authority. (ii) Prior to the occupation of the first phase, details of the site wide management company, including their level and type of experience, who will have overarching responsibility for the management of the site, including management of the company	• Operations and maintenance procedures, including the method of reporting (including incidents), replacement of mitigation measures, detection systems and the corrective actions which would be implemented in the case of the failure of the identified mitigation measures. The monitoring, reporting and management shall be undertaken in accordance with the approved plan. Should detailed design of each phase of the development require changes to the approved management plan then an amended plan shall be submitted to and approved in writing by the Local Planning Authority, prior to the occupation of a phase. c) Management Company (i) Prior to construction details of the company, including their level and type of experience, who will be employed to undertake the monitoring, reporting, management and maintenance requirements in accordance with the plan approved under 7a, shall be submitted to and approved in writing by the Local Planning Authority. (ii) Prior to the occupation of the first phase, details of the site wide management company, including their level and type of experience, who will have overarching responsibility for the management of the site, including management of the company employed prior to construction as under 7c) (i) above, and who will undertake the ongoing monitoring, reporting, management and maintenance requirements in accordance with the plans approved under 7a and 7b above, shall be submitted to and approved in writing by the Local Planning Authority. Any subsequent changes of the Management Company shall be submitted to and approved in writing by the Local Planning Authority, one month prior to the change.
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	employed prior to construction as under 7c) (i) above, and who will undertake the ongoing monitoring, reporting, management and maintenance requirements in accordance with the plans approved under 7a and 7b above, shall be submitted to and approved in writing by the Local Planning Authority. Any subsequent changes of the Management Company shall be submitted to and approved in writing by the Local Planning Authority, one month prior to the change.	
46	Prior to the submission of any reserved matters any phase or part of a phase an assessment of the nature and extent of contamination (including ground gas) shall be submitted to and approved in writing by the Local Planning Authority. This assessment must be undertaken by a competent person, in accordance with relevant guidance and British standards, and shall assess any contamination on the site, whether or not it originates on the site. Moreover, it must include: (i) a survey of the extent, scale and nature of contamination; (ii) an assessment of the potential risks to: • human health, • property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes, • adjoining land, • and surface water, ecological systems, • archaeological sites and ancient monuments.	~~Prior to the submission of any reserved matters~~ No development for any phase or part of a phase shall take place until an assessment of the nature and extent of contamination (including ground gas) ~~shall~~ has been submitted to and approved in writing by the Local Planning Authority. This assessment must be undertaken by a competent person, in accordance with relevant guidance and British ~~S~~standards, and shall assess any contamination on the site, whether or not it originates on the site. Moreover, it must include: (i) a survey of the extent, scale and nature of contamination; (ii) an assessment of the potential risks to: • human health, • property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes, • adjoining land, • ~~and~~ surface water, • ecological systems, • archaeological sites and ancient monuments.
50	a) Ground Gas Prior to implementation of the development a management plan shall be submitted to and approved in writing by the Local Planning Authority setting out the: • Frequency and type of monitoring of ground gases to be undertaken to include on and off site gas migration;	a) Ground Gas Prior to implementation of the development a management plan shall be submitted to and approved in writing by the Local Planning Authority setting out the: • Frequency and type of monitoring of ground gases to be undertaken to include on and off site gas migration; • Frequency and method of reporting the results;

Please note, additions are shown in **red italics**, and deletions are shown by a ~~strike through~~.

	• Frequency and method of reporting the results; • What remedial actions will be taken in the event of results or readings showing a worsening of earlier readings. The monitoring, reporting and consequent management of ground gas shall be undertaken in accordance with the approved plan, prior to, during and post construction and until the waste is unlikely to present a hazard to human health, i.e. when monitoring demonstrates that the site Characterisation CS2 has been reached (demonstrated by the results of a minimum of 24 datasets over two consecutive years at this level). b) Gas Mitigation Measures Prior to construction a management plan shall be submitted to and approved in writing by the Local Planning Authority. This will set out the: • Proposed gas mitigation measures for the buildings; • Type and frequency of monitoring and recording of gas levels within buildings; • Operations and maintenance procedures, including the method of reporting(including incidents), replacement of mitigation measures, detection systems and the corrective actions which would be implemented in the case of the failure of the identified mitigation measures. The monitoring, reporting and management shall be undertaken in accordance with the approved plan. Should detailed design of each phase of the development require changes to the approved management plan then an amended plan shall be submitted to and approved in writing by the Local Planning Authority, prior to the occupation of a phase. c) Management Company	• What remedial actions will be taken in the event of results or readings showing a worsening of earlier readings. The monitoring, reporting and consequent management of ground gas shall be undertaken by a 'competent person', as defined in Land Contamination Risk Management LCRM: Before you start - GOV.UK, in accordance with the approved plan, prior to, during and post construction , but prior to occupation, and until the waste is unlikely to present a hazard to identified critical receptors in the context of the proposed development human health, i.e. when monitoring demonstrates that the site has been appropriately assessed in accordance with current guidance, such as the Environment Agency's (LCRM) guidance and that the Ground Gas risks have been characterised in accordance with the approaches outlined within British Standards and where appropriate, other current, relevant, authoritative guidance. ~~Characterisation CS2 has been reached (demonstrated by the results of a minimum of 24 datasets over two consecutive years at this level).~~ b) Gas Mitigation Measures Prior to construction of any phase or part of phase a management plan shall be submitted to and approved in writing by the Local Planning Authority. This will set out the: • Proposed gas mitigation measures for the buildings; • Type and frequency of monitoring and recording of gas levels within buildings; • Operations and maintenance procedures, including the method of reporting(including incidents), replacement of mitigation measures, detection systems and the corrective actions which would be implemented in the case of the failure of the identified mitigation measures. The monitoring, reporting and management shall be undertaken in accordance with the approved plan. Should detailed design of each phase of the development require changes to the approved management plan then an amended plan shall be
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	(i) Prior to construction details of the company, including their level and type of experience, who will be employed to undertake the monitoring, reporting, management and maintenance requirements in accordance with the plan approved under 7a, shall be submitted to and approved in writing by the Local Planning Authority. (ii) Prior to the occupation of the first phase, details of the site wide management company, including their level and type of experience, who will have overarching responsibility for the management of the site, including management of the company employed prior to construction as under 7c) (i) above, and who will undertake the ongoing monitoring, reporting, management and maintenance requirements in accordance with the plans approved under 7a and 7b above, shall be submitted to and approved in writing by the Local Planning Authority. Any subsequent changes of the Management Company shall be submitted to and approved in writing by the Local Planning Authority, one month prior to the change.	submitted to and approved in writing by the Local Planning Authority, prior to the occupation of a phase. c) Management Company (i) Prior to construction of any phase or part of phase details of the company, including their level and type of experience, who will be employed to undertake the monitoring, reporting, management and maintenance requirements in accordance with the plan approved under 7a, shall be submitted to and approved in writing by the Local Planning Authority. (ii) Prior to the occupation of the first phase, details of the site wide management company, including their level and type of experience, who will have overarching responsibility for the management of the site, including management of the company employed prior to construction as under 7c) (i) above, and who will undertake the ongoing monitoring, reporting, management and maintenance requirements in accordance with the plans approved under 7a and 7b above, shall be submitted to and approved in writing by the Local Planning Authority. Any subsequent changes of the Management Company shall be submitted to and approved in writing by the Local Planning Authority, one month prior to the change.
57	The implementation of soft landscaping, including tree planting in accordance with the approved tree pit specifications, shall be undertaken prior to occupation of any phase or part of a phase.	~~The implementation of soft landscaping, including tree planting in accordance with the approved tree pit specifications, shall be undertaken prior to occupation of any phase or part of a phase.~~