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25189/A3/EP/BT/bc

13<sup>th</sup> October 2020

Dear Sir/Madam,

**CENTRAL AND EASTERN BERKSHIRE - JOINT MINERALS & WASTE PLAN  
REGULATION 19 PROPOSED SUBMISSION CONSULTATION**

We write on behalf of our Client, SEGRO in respect of their land interests at Island Road, Reading (the 'Site'), in connection with the above public consultation on the Central and Eastern Berkshire Joint Minerals and Waste Plan Regulation 19 Proposed Submission Consultation (the 'Draft Minerals and Waste Plan' hereafter).

Planning Context

The Site has been allocated in the Reading Local Plan (November 2019) for warehouse/industrial uses under SR1a (Former Landfill, Island Road) (**Appendix 1**) with an indicative capacity of 95,000-116,000m<sup>2</sup> of floorspace. This will assist in meeting the Plan's overall requirement of 148,000m<sup>2</sup> of employment floorspace during the Plan Period (2013-2036) that is set out under Policy EM1 (Provision of Employment Development).

The Site also forms part of the Island Road Major Opportunity Area, which is a Preferred Waste Area, as set out in Appendix C of the Draft Minerals and Waste Plan.



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This is an industrial area that is considered potentially suitable for Category 3 (Activities requiring enclosed industrial premises (small scale)) waste development.

Appendix B sets out what these waste facility categories mean. There are 7 categories, that have been classified based on the type of activity involved. Appendix B notes that the categories should be used to inform the suitability of the allocation sites for waste activities.

### Draft Policy W2 – Safeguarding of Waste Management Facilities

Draft Policy W2 sets out that all existing, planned and allocated waste management facilities shall be safeguarded against development that would prejudice or jeopardise their operation by creating incompatible land uses. New waste management facilities will also be automatically safeguarded.

The current wording of the above policy appears to prohibit other uses which would be acceptable 'in principle' when judged against Reading Borough Council's adopted Development Plan. It also prohibits the flexible use of the Site, given waste facilities would become safeguarded by virtue of the Policy. There is, therefore, evidently a conflicting policy position between the recently adopted Reading Local Plan and the emerging policy position set out in the consultation document.

Given the Site at Island Road has been allocated to meet Reading Borough Council's objectively assessed employment needs<sup>1</sup>, we consider that this Policy is not positively prepared, justified or effective and therefore fails the tests of soundness (NPPF Paragraph 35).

As such, whilst we support the principle of the Draft Minerals and Waste Plan to promote waste development in appropriate places, we request that a footnote is added to the Policy to ensure Draft Policy W2 meets the tests of soundness. This could be inserted after the word 'safeguarded' to make it clear that the Policy does not fetter the ability to bring forward sites for uses that are allocated within other Development Plan Documents, or to use these allocated sites flexibly. Our suggested wording is set out below:

**“<sup>97</sup>For the avoidance of doubt, Policy W2 does not prohibit sites allocated within a separate Development Plan Document from coming forward for the uses allocated within that Plan. Furthermore, Policy W2 does not seek to safeguard new waste management facilities on Sites allocated for employment within a separate Development Plan Document”**

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<sup>1</sup> Thames Valley Berkshire Local Enterprise Partnership, Central Berkshire FEMA Economic Development Needs Assessment (October 2016)

The above would ensure that, while the Site is seen as suitable for waste management facilities, it can also come forward to meet the needs that have been identified within the respective Development Plan Documents as part of a flexible approach.

In addition to this footnote, we consider that Point '2' of Draft Policy W2 should be expanded to set out that redevelopment of new waste management facilities is acceptable where:

- 1. It can be shown that there is suitable provision of waste management facilities within the area;**
- 2. It is no longer viable to support waste management facilities on the site;**
- 3. It can be shown that the benefits of the proposed development outweigh the impacts; or**
- 4. Site-specific circumstances make the use of the site for waste management facilities unsuitable.**

This will ensure the Plan is in accordance with Paragraphs 120 and 121 of the NPPF, which requires planning policies to reflect changes in demand for land, but also ensures the emerging policy does not compromise Reading Borough Council's ability to comply with Paragraphs 11 and 20 of the NPPF (i.e. meeting objectively assessed employment needs as a minimum) and Paragraph 82 (planning policies recognising and addressing the specific locational requirements of storage and distribution uses).

#### Draft Policy W4 – Locations and Sites for Waste Management

Draft Policy W4 supports the delivery of waste management infrastructure within the Preferred Waste Areas listed in Appendix C. As set out above, the Site is allocated as a Preferred Waste Area and is seen as potentially suitable for Category 3 development.

We consider that within Appendix C, the categories that are potentially suitable for the Island Road Major Opportunity Area could be expanded to maximise flexibility and include:

- Category 1 (Activities requiring open sites or ancillary open areas (possibly biological treatment));
- Category 2 (Activities requiring a mix of enclosed buildings/plant and open ancillary areas (possibly involving biological treatments); and
- Category 4 (Activities requiring enclosed industrial premises (large scale)).

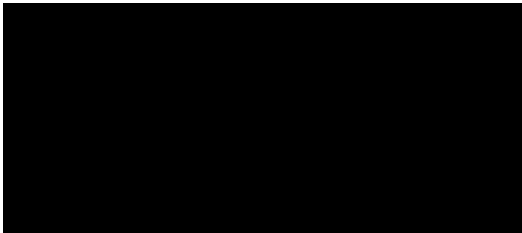
As currently written, the Plan seeks to restrict the range of uses in the Preferred Waste Areas. Development within categories 1-4 could be feasible at the Site, subject to site-specific considerations.

As such, to ensure that the Plan is justified, Appendix C should be amended to read (amendments underlined):

**"2. The delineation of the site is shown by the red boundary. The types of waste activity that are considered suitable are provided but it should be noted that development that falls within other categories could be considered appropriate subject to site-specific considerations/assessment. More detail on these activities is provided in Appendix B."**

We trust that our comments will be given due consideration in progressing the Plan. Should you wish to discuss our response in greater detail or require any further information, please do not hesitate to contact me or Ben Taylor using the contact details on this letter.

Yours faithfully,



Senior Planner

Cc.

Enc.

**Appendix 1 – Policy SR1a (Former Landfill Site, Island Road)**

## 6.3 South Reading Site-Specific Policies

### Island Road Major Opportunity Area

**VISION:** *The Island Road area will be a major new location for industrial and warehouse development, providing jobs in one of the areas of greatest need.*

#### SR1: ISLAND ROAD MAJOR OPPORTUNITY AREA

*Development in the Island Road Major Opportunity Area will provide approximately 120,000 to 150,000 sq m of new business space comprising mainly industrial and warehouse uses, with some supporting office uses.*

*Development will:*

- i. Locate the noisiest elements of the development away from any existing or planned residential, and include an adequate landscaped buffer to residential to ensure that there are no significant adverse effects through noise and disturbance;*
- ii. Through sensitive design, layout and landscaping, ensure that development does not detract from the character and appearance of the Kennet Meadows major landscape feature;*
- iii. Avoid negative impacts on drainage, water quality and flood risk on or off the site, including in relation to the river intake and groundwater protection zone of the nearby Fobney Water Treatment Works;*
- iv. Take account of potentially contaminated land and potential odour issues arising from the sewage treatment works;*
- v. Protect and where possible enhance biodiversity, particularly related to any development in close proximity to the watercourses, taking the findings of an ecological assessment into account;*
- vi. Protect existing public rights of way and enhance links to the east, across the A33;*
- vii. Safeguard land which is needed for proposed mass rapid transit routes and stops;*
- viii. Take steps to mitigate any significant adverse impacts on the transport network;*
- ix. Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and*
- x. Provide measures to ensure that the increase in new employment opportunities offers benefits to the local workforce, including through employment, skills and training measures.*

*Development in surrounding areas will be in line with the following provisions for each sub-area:*

**SR1a, FORMER LANDFILL, ISLAND ROAD:**

*The former landfill site will be developed for warehouse uses with some potential for industrial uses where it would not cause detrimental impacts to existing or planned residential. Development on past landfilled areas will need to demonstrate that it will not cause any negative effects on human health or on the wider environment. The noisiest elements of the development should be located away from any existing or planned residential, in particular residential at Green Park to the south, and development should include an adequate landscaped buffer to residential to ensure that there are no significant adverse effects through noise and disturbance, and a 10m undeveloped buffer to the top of the bank of the watercourse to the east. Development should have regard to the development of the whole site and access should be considered as a comprehensive whole.*

*Site size: 32.13 ha      Indicative potential: 95,000-116,000 sq m of industrial/warehouse use*

**SR1b, NORTH OF ISLAND ROAD:**

*This site will be developed for industrial/warehouse uses. Development should include a strong undeveloped ecological buffer to the River Kennet, as well as an ecological buffer to the brook to the west, to ensure that there are no adverse impacts on the biodiversity value of the watercourse. A buffer should also be provided to existing residential to the west to ensure that there are no significant negative impacts on residential amenity.*

*Site size: 3.17 ha      Indicative potential: 7,400-9,000 sq m of industrial/warehouse use*

**SR1c, ISLAND ROAD A33 FRONTAGE:**

*This site will be developed for commercial use. Proposals for industrial or warehouse use will therefore be appropriate, as will offices in line with the existing permission. Related commercial uses as part of the mix may also be appropriate, although proposals that would involve main town centre uses (excluding offices) will only be appropriate where there is no significant adverse impact on existing centres. The frontage to the A33 will be of high visual quality, and an alignment for a mass rapid transit route through the site in a north-south direction will be a requirement.*

*Site size: 9.7 ha      Indicative potential: 27,000-32,000 sq m of industrial/warehouse uses, or alternative commercial uses.*

- 6.3.1** The land around Island Road provides the main opportunity to meet the identified needs for industrial and warehouse land in Reading. It is located in close proximity to some of the areas of greatest concentration of unemployment and low skills, and could therefore potentially provide substantial economic benefits to the town.
- 6.3.2** However, the particular circumstances of much of the land mean that development will need to be sensitively designed and constructed. To the south of the area, over 700 new homes are being constructed at Green Park, and development risks creating tensions between these two uses. The areas to the north are identified as a major landscape feature, and development would potentially be visible from this feature, particularly where land is raised. Much of the site was previously used as sludge beds before becoming landfill, some of which was filled fairly recently, whilst other areas are within Flood Zone 2. For this reason, development will be dependent on adequately overcoming these constraints.
- 6.3.3** In terms of transport, the provision of new mass rapid transit, for which planning has reached an

advanced stage in South Reading, provides part of a solution to transport issues in the area, and land close to the A33 and within SR1c will be required to deliver this measure. The MRT routes will be required to the south to Mere oak park and ride, and to the south west towards the planned Green Park station and interchange. One possible route towards Green Park station, as an alternative to Longwater Avenue, would be through site SR1a, and the potential for this route to be provided will need to be considered.



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**Key**

- ..... Sub-area boundary
  - Major Opportunity Area
  - Footprint of existing building in Major Opportunity Area
  - Existing building
  - Recent building or building under construction
  - Area under construction—exact form of whole development not shown
  - Proposed Mass Rapid Transit route
  - Potential alternative Mass Rapid Transit route (indicative)
  - Vehicle access point (approx.)
  - Key movement corridor (pedestrian and/or cycle)
  - Location of the bridge crossing as part of existing permission
  - Preserved/enhanced Green Link
  - Nearby sensitive location—low-rise residential
  - Nearby sensitive location—wildlife, landscape and water feature
  - High quality frontage to A33
  - Landscaped buffer to areas of wildlife and landscape importance
  - Need for strong buffer between employment space and residential
- Sub-Areas**
- A** SR2a: Former Landfill, Island Road
  - B** SR2b: North of Island Road
  - C** SR2c: Island Road A33 Frontage

**Figure 6.2: Island Road Major Opportunity Area Strategy**



- 6.3.4 Planning permission already exists for over 70,000 sq m of offices on site SR1c as part of the Kennet Island planning permission. Whilst implementation of this scheme remains possible, this is not expected. The site is therefore also identified for alternative commercial uses, in particular industry and warehousing, albeit that other uses such as car showrooms or trade counter uses, along with offices in line with existing permissions, will potentially be appropriate. The existing office permission was considered appropriate in terms of transport impacts, and this will be taken into account in assessing schemes. The works to the Island Road and A33 junction were undertaken as part of the infrastructure works associated with this permission. Prior to development taking place, there may be some use of the site for temporary uses, where it would not affect the long term development potential of the site.
- 6.3.5 The location of the site close to the sewage treatment works means that early liaison with Thames Water is likely to be required. Sites within this area potentially contain public sewers. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.
- 6.3.6 Figure 6.2 illustrates some of the key principles from the policy.

### Land North of Manor Farm Road Major Opportunity Area

**VISION:** *Land north of Manor Farm Road will be a new residential community linking to Kennet Island and centred on an extended Whitley district centre.*

#### **SR2: LAND NORTH OF MANOR FARM ROAD MAJOR OPPORTUNITY AREA**

*Redevelopment of the Manor Farm Road site will primarily be for housing (between 680-1,020 dwellings), an extension to the Whitley District Centre, school provision and open space and public realm improvements, but also include small employment units to replace the Micro Centre, community uses, in addition to a limited amount of employment uses.*

#### **Development will:**

- i. Not be piecemeal in nature but will only be in appropriately sized/arranged sites that will promote the integration of Kennet Island with the established areas of Whitley to the east<sup>115</sup>. Proposals should be designed in the context of a wider development of the area;*
- ii. Incorporate measures to facilitate improved pedestrian and cycle permeability, in particular east/west links across Basingstoke Road and through to Kennet Island;*
- iii. Enhance the Basingstoke Road frontage to reflect the scale and character of existing residential development to the east;*

<sup>115</sup> This will ultimately be a judgement to make at planning application stage. It is not expected that all sites within SR2 will come forward at once, but the decision on whether particular schemes are acceptable will be based on whether a site can be developed without significantly compromising the living environment of residents of the site, and without resulting in an inward-looking scheme that prevents the development from relating well to future development of adjoining sites. This will need to take into account matters such as the size of the site, the relationship with and use of adjoining sites and whether an appropriate buffer exists or can be created.