



Woolf Bond Planning
Chartered Town Planning Consultants

WBP Ref: SB/GR/8156

[REDACTED]

15th October 2020

Central and Eastern Berkshire Authorities Joint Minerals and Waste Plan
c/o Hampshire Services,
Strategic Planning,
Hampshire County Council,
First Floor Elizabeth II Court West,
The Castle,
Winchester,
SO23 8UD

Sent via email to berks.consult@hants.gov.uk

Dear Sir/Madam,

**CENTRAL AND EASTERN BERKSHIRE: JOINT MINERALS & WASTE PLAN PROPOSED
SUBMISSION (AUGUST 2020) – REGULATION 19 CONSULTATION**

REPRESENTATIONS ON BEHALF OF BELLWAY HOMES

LAND AT GREENACRES, SOUTH OF NINE MILE RIDE, FINCHAMPSTEAD

General

We refer to the above Regulation 19 consultation and write on behalf of our client, Bellway Homes, setting out our comments upon certain of the draft policies and proposals contained therein, including our objection to the inclusion of land at Greenacres, South of Nine Mile Ride, Finchampstead (which Site is referenced in Appendix C to the Proposed Submission Plan as Nine Mile Ride Industrial Estate) as a potential location for Category 3 Waste Management Operations.

Objection to Policy W4 and Appendix C

Policy W4 sets out the Council's approach to locations of and sites for waste management.

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As set out in the supporting text to the policy (paragraphs 7.97 to 7.103 refer), a number of sites have been identified as being appropriate locations, in principle, for hosting waste management activities. These sites are listed in Appendix A.

However, it is then added that the sites in Appendix A are not sufficient to meet the future waste management requirements of Central and Eastern Berkshire up to the end of the Plan period and therefore, it is expected that further new sites will come forward through market-led delivery.

Paragraph 7.99 refers to a review undertaken on behalf of the Authorities of industrial estates and employment land that has identified industrial estates and/or employment sites that are suitable for locating waste management facilities in the boroughs of Bracknell Forest, Reading and Wokingham.

It is further added that the identified sites are existing, or proposed, allocations for land uses which are considered compatible to waste uses.

Paragraph 7.101 state that the review concluded that 25 sites (referred to as 'Preferred Waste Areas') are potentially suitable for waste uses ranging from 'Activities requiring a mix of enclosed buildings/plant and open ancillary areas (possibly involving biological treatment)' to 'Activities requiring enclosed building with stack (small scale)'. The sites are listed in Appendix B and C.

Our clients' site is identified in Appendix C.

However, and of fundamental importance is that the site will not be made available for such uses during the plan period. Accordingly, the Plan cannot be said to be sound with in the inclusion of Site for waste management operations.

Taking account of National Guidance in the NPPF, Planning Policy for Waste together with the PPG, there is a clear emphasis on establishing whether the draft Plan is deliverable, and that the opportunities identified, including as preferred waste areas in draft Policy W4 are realistic.

Taking account of this clear guidance, it is not considered that the identification of the Nine Mile Ride Industrial Area as a preferred area in Appendix C of the Draft Submission Plan is sound the following reasons:

1. Our clients are actively promoting the site through the emerging Wokingham Borough Local Plan as a potential housing allocation; and the Wokingham Borough Council's Housing and Economic Land Availability Assessment ("HELAA") positive appraises the site in terms of its developability for housing (Site Ref: 5FI004) given its part previously developed status. Accordingly, the site will not be made available at any point during the Plan period for waste related development. As such, this element of the Plan cannot be said to be effective as a it is not deliverable for waste purposes.
2. In listing the Greenacres Farm site (Nine Mile Ride Industrial Area) as a preferred location in Appendix C (page 182) with potential for category 3 waste management (activities requiring enclosed industrial premises (small scale)), no formal assessment of the practicality or feasibility of small scale units suitable for waste activities have been made. The guidance in Appendix B of the Draft Submission Plan indicates that small scale waste management operations (category 3) typically cover <1-2 ha. The Waste Proposal Study

accompanying the Draft Submission Plan indicates that the Nine Mile Ride site only extends to 1.61ha (page 218). It also states that Sites description is:

“Farm Diversification. Numerous scatted smaller buildings of a variety of ages and types. Industrial and storage uses predominate. Sufficient HGV access and turning area.”

3. Having regard to the details of the site’s assessment in the Plan, it is clear that the Greenacres Farm industrial site is small and is potentially of an insufficient scale to accommodate the Category 3 waste management operations. Furthermore, the guidance in the PPG is clear that to identify industrial estates as a potential waste location, there must be a variety of sites which can accommodate the facility.
4. Having regard to the limited size of the existing industrial site (as confirmed by the Waste Planning Authorities evidence), there is consequently only a very limited opportunity on the site to provide the waste facility whilst non-waste commercial activities are retained on the remainder of the estate. This is therefore an indication that the identification of the site is inconsistent with national policy, another facet illustrating the Plan is unsound.

These factors demonstrate that the identification of Greenacres Farm/Nine Mile Ride Industrial Estate as a preferred waste location in Policy W4 (and associated appendix C) is demonstrably unsound.

Necessary Changes to Satisfy the Tests of Soundness

In order to address our soundness concerns with the Plan as drafted, the Nine Mile Ride Industrial Estate should be omitted from Appendix C of the Draft Submission Plan with consequential revisions to the Policies Map.

In order to ensure the adequacy and robustness of the Waste Planning Authorities assessment of preferred waste site is fully considered taking account of the points above, we wish to appear at the examination of the Joint Minerals & Waste Plan.

We trust the above comments are of assistance in advancing the Plan and await confirmation of receipt of our representations in due course.

We welcome the opportunity to enter into dialogue with the Council in order to further proposals for the potential to deliver a sound Plan.

Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising.

Yours faithfully,



Steven Brown BSc Hons DipTP MRTPI

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