

**EXAMINATION INTO THE SOUNDNESS OF THE CENTRAL AND EASTERN
BERKSHIRE – JOINT MINERALS AND WASTE PLAN**

Matter 6 – Strategy for Waste

Preamble

This Hearing Statement is made on behalf of SEGRO. Our original representation dated the 13th October 2020 (Rep 19), made to the Regulation 19 consultation, with regard to their Site at Island Road, Reading being included as part of the proposed 'Island Road Major Opportunity Area', which is a Preferred Waste Area of Policy W4, as set out within Appendix C of the Draft Minerals and Waste Plan (the 'Draft Plan').

Whilst our Client's representation indicated support for the principle of the Draft Plan and the inclusion of their Site within the Preferred Waste Area, it highlighted several concerns with the Plan making process, specifically that the phrasing of proposed policy, would unduly and unnecessarily conflict with other policies within the Draft Plan, as well as that which legally exists elsewhere within the Development Plan (the Reading Borough Local Plan 2019) for the Site.

The representation included recommendations to help resolve the conflict (both internal to the Draft Plan and with other Development Plan Documents) and remove our concerns that the policy is currently not positively prepared, justified or effective and therefore fails the test of soundness as required by Paragraph 35 National Planning Policy Framework (NPPF).

Our earlier representation remains a material consideration which should be considered in full. However, this matters' statement should be read alongside, as it helps 'reframe' the original representation's primary points, as we have now had regard to the Inspector's likely direction of assessment, as identified through the recently published 'Matters, Issues and Questions' document, which helpfully sets out the key issues for the strategy for waste through Main Matter 6.

6.3 Does the Plan appropriately take into account future development allocations and strategies in the other constituent parts of the development plan with regard to the future need, provision and location of waste facilities?

6.5 Is the approach in Policy W4 of primarily relying on the 25 Preferred Waste Areas justified and effective? How will this ensure that sufficient waste capacity is delivered to meet the capacity requirements identified in Policy W3, whilst also having regard to the proximity principle?

6.7 Are any of the Preferred Waste Areas allocated for a different use or protected by policies in any other Development Plan Documents that might prevent them being realistically considered to be available for waste management proposals?

6.13 Is the proposed approach in Policy W2 for safeguarding waste management facilities justified in the context of existing and future waste capacity requirements and the relationship to the growth and development strategies contained within other Development Plan Documents?

1. We consider that key issues 6.3, 6.5, 6.7 and 6.13 identified by the Inspector, have an overarching relevance to the lead purpose of our original representation as they all, albeit by differing degrees, relate to the matter of site delivery, with particular emphasis on the relationship to other Development Plan considerations.
2. Our previous representation explained that the Draft Plan has not given due regard to the presence of an existing major allocation at our client's Site for industrial and warehouse development through Policy SR1a (Former Landfill Site, Island Road) of the 2019 adopted Reading Borough Local Plan. This allocation meaningfully contributes to Reading Borough Council's objective assessed employment needs. In doing so, the allocation was defined by the Council as '*providing jobs in one of the areas of greatest need*' within the supporting vision to the Site's allocation.
3. This adopted Site allocation has a clear material bearing on how the Site should be considered when considering new land use implications through the Draft Plan assessment process.
4. Whilst our client fully acknowledges and supports the proposed Preferred Waste Area coming forward for their Site, as the principle of waste processing is compatible with industrial land allocations, the associate Draft Policy W2 – Safeguarding of Waste Management Facilities as currently phrased within point 1, will have unduly restrictive implications on our client's ability to bring non-waste industrial and warehouse development forward; as already allocated through the adopted Reading Local Plan for the site.
5. Further, we note that there is reference within the Draft Plan (Paragraph 7.25 and 7.31) to temporary waste sites and safeguarding. The wording of Draft Policy W2 should be amended to make it clear and unambiguous (NPPF Paragraph 16) that 'meanwhile' uses

should not be safeguarded. We consider a reference within the explanatory text is not sufficient.

6. On this basis, the following suggested additions within our original representation were requested:

Policy W2 Changes	New Text (underlined as proposed)
Additional text to be included.	<p><u>“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.”</u></p>
Point ‘2’ of the existing policy wording should be expanded to set out that.	<p><u>“Redevelopment of new waste management facilities is acceptable where:</u></p> <ol style="list-style-type: none"> <u>1. It can be shown that there is suitable provision of waste management facilities within the area;</u> <u>2. It is no longer viable to support waste management facilities on the site;</u> <u>3. It can be shown that the benefits of the proposed development outweigh the impacts;</u> <u>or</u> <u>4. Site-specific circumstances make the use of the site for waste management facilities unsuitable.”</u>

Table 1: Requested changes to Policy W2

7. Our client simply seeks such rephrasing of Policy W2 to ensure flexibility and that the Site is still suitable for waste management facilities, but prevents the proposed safeguarding policy from prohibiting development being brought forward which is already confirmed within Reading Borough Local Plan which has significant material

weight. The Draft Plan currently contains an internal conflict which requires rectifying to make it sound.

6.8 The Plan identifies in Appendix B, seven categories of waste management facilities. The 25 Preferred Waste Areas do not include any areas suggested to be suitable to categories 1, 5, 6 and 7, is there an identified need for them? Does the policy approach of primary reliance upon Preferred Waste Areas identify sufficient areas of focus to enable the waste industry to deliver the facilities that are needed over the plan period relevant to the types of waste streams that need to be managed and the operational requirements of the respective waste management facilities?

1. This key issue considers the delivery of the seven categories of waste management over the Plan period but with particular emphasis on the shortfall of category 1, 5, 6 and 7 waste management facilities.
2. Whilst the proposed Preferred Waste Area for the Island Road Major Opportunity Area may not be able to support all these specific categories, our original representation explained that the Draft Plan’s current identification as only being suitable for Category 3 waste management facilities as limiting the site’s actual and realistic delivery potential. It is considered that the waste management facilities could be expanded out to include categories 1, 2 and 4 subject to site specific considerations, thereby helping to maximising the opportunity of delivery of waste facilities over the Plan period.
3. Further to this, to ensure that it is unambiguous (NPPF Paragraph 16) that the Draft Plan is not seeking to restrict the types of waste site that come forward, and that this will be determined by site-specific considerations, we consider that the wording in Appendix C is amended at Point ‘2’. This will ensure flexibility.

Changes to the Island Road Major Opportunity Area Text	Expanded Text (underlined as proposed)
Supporting text should be expanded to include that underlined	This industrial area is considered potentially suitable for the following waste categories: <ul style="list-style-type: none"> • <u>Category 1 (Activities requiring open sites or ancillary open areas (possibly biological treatment));</u>

	<ul style="list-style-type: none"> • <u>Category 2 (Activities requiring a mix of enclosed buildings/plant and open ancillary areas</u> • <u>(possibly involving biological treatments);</u> • Category 3: Activities requiring enclosed industrial premises (small scale); <u>and</u> • <u>Category 4 (Activities requiring enclosed industrial premises (large scale).</u>
<p>Point '2' of the existing policy wording should be expanded to set out that redevelopment of new waste management facilities is acceptable where:</p>	<p>"2. The delineation of the site is shown by the red boundary. The types of waste activity that are considered suitable are provided <u>but it should be noted that development that falls within other categories could be considered appropriate subject to site-specific considerations/assessment.</u> More detail on these activities is provided in Appendix B."</p>

Table 2: Requested changes to Appendix C - Island Road Major Opportunity Area, Preferred Waste Area