

## Comment

Consultee	[REDACTED] (1335104)
Email Address	[REDACTED]
Company / Organisation	West Berkshire Council as landowner
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	West Berkshire Council as landowner ([REDACTED] - 1335104)
Comment ID	PS666
Response Date	03/03/23 13:10
Consultation Point	Policy SP 20 Strategic approach to employment land ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	West Berkshire Council as landowner

### 1. Do you consider the Local Plan Review is legally compliant?

*Please see the guidance note for an explanation of what 'legally compliant' means*

Yes

### 2. Do you consider the Local Plan Review is sound?

*Please see the guidance notes for an explanation of what 'soundness' means.*

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

*Please tick all that apply:*

**Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where** . Yes

practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. . Yes

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

### 3. Do you consider the Local Plan Review complies with the Duty to Co-operate?

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

Yes

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Propose adding additional wording to the supporting text to clarify the Council's aspirations for the LRIE. Additional wording highlighted in bold below. The evidence for this is contained within the Addendum (attached to this response) to the Avison Young Development Brief published in September 2022 available at <https://info.westberks.gov.uk/lrie>

Later in these comments, under SP21, it is proposed to extend the London Road Industrial Estate Designated Employment Area to include the Football Ground – hence the inclusion of 'it currently' in the text of paragraph 7.10 below.

7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) will provide flexibility to the figures in the later part of the plan period. The redevelopment and regeneration of the LRIE is a long held vision of the Council and a recent decision by the Council's Executive (June 2022) agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality –**including the creation of 7,000 sqm of employment floorspace**. The site has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site, which at present is not optimum and does not provide an attractive environment for modern day use. The majority of the LRIE site falls within the London Road Industrial Estates DEA, an area designated for business uses. It is important to note that the DEA includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate, but **it currently** excludes the football ground. A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site.

### 5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

**6. Notification of Progress of the Local Plan Review**

Do you wish to be notified of any of the following?

*Please tick all that apply*

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

**Upload a document**

Please use this function if you would like to upload a document that supports your comment. Please note that your formal comments must still be made above, where relevant. Individual documents should not exceed 10MB.

[LRIE - Addendum 05.09.22 FINAL \(002\).pdf](#)

# West Berkshire District Council

London Road Industrial Estate: Development Brief Addendum



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**Report title: London Road Industrial Estate: Development Brief Addendum**

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**Reviewed by:** Nick Alston

**Status:** Final

**Draft date:** 5 September 2022

**For and on behalf of Avison Young (UK) Limited**

## 1. Introduction

1.1 This Development Brief Addendum has been prepared by Avison Young on behalf of West Berkshire District Council (WBDC) (as landowner) and should be read in conjunction with the *London Road Industrial Estate: Development Brief* (LRIE DB) dated November 2020 (prepared by Avison Young) and approved by the Council's Executive on 19<sup>th</sup> November 2020.

1.2 At a meeting on 9<sup>th</sup> June 2022 the Council's Executive approved the *LRIE Project Refresh* report which sets out the Council's revised approach to the LRIE as follows:

- *"A focus on attracting investment in employment space and jobs that aligns with carbon net zero ambitions;*
- *A commitment to working in partnership with leaseholders and potential partners to grow current LRIE businesses in a sustainable way and encourage new businesses;*
- *A sustainable design-led approach to place-making to create an appealing destination for businesses that includes seeking external funding for public realm improvements;*
- *A move away from the residential-led approach set out in the 2020 Development Brief."*

## Purpose of Addendum

1.3 Further to this, the Council has asked Avison Young to advise on the potential employment-led development capacity within WBDC controlled land (comprising parcel 13J and parcels 13Q, 13P, and 13O shown below in **Figure 1**) and to consider how such employment-led development would align with adopted and emerging planning policy. The purpose of this note is to set out our advice on this. To note, land within the redline boundary shown below in **Figure 1** represents the Council's current freehold across the LRIE, whilst green coloured land is Council controlled, blue coloured land is leaseholder controlled, and red coloured land (Thames Water site) is not Council controlled.

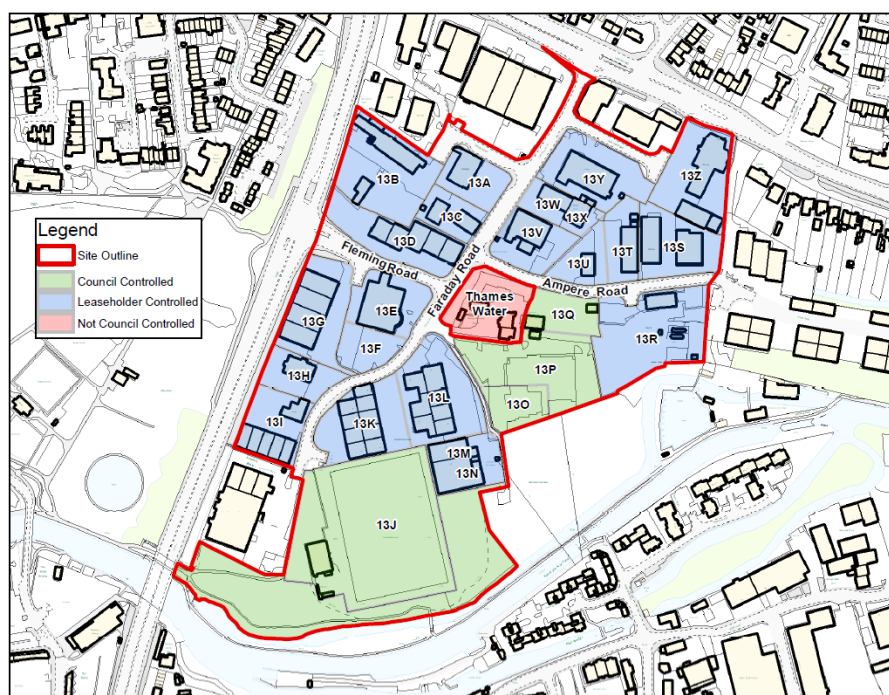


Figure 1 - LRIE Site Location and Parcel Plan (Source: WBDC)

- 1.4 The addendum does not update the previous LRIE masterplan drafted by WSP, or include any detailed site investigations, but utilises previous (and updated) assumptions related to site suitability and capacity based on previous evidence and by applying applicable plot ratios for industrial-led development.

## 2. Context

### Local Plan Review

- 2.1 Since the publication of the LRIE DB in November 2020, the Council has continued to progress its draft Local Plan. The Council's Regulation 18 draft *Local Plan Review 2020-2039* (LPR) was published and consulted upon between 11<sup>th</sup> December 2020 and 5<sup>th</sup> February 2021.
- 2.2 Following updates to the National Planning Policy Framework (NPPF) in July 2021, the Council has taken the decision to delay the ongoing LPR to ensure accordance with updated national policy.
- 2.3 The next iteration of the draft LPR (Regulation 19 version) will need to be consulted upon prior to submission to the Secretary of State for Examination in Public. According to the Council's latest Local Development Scheme (June 2022), it is envisioned that a Regulation 19 (submission version) LPR will be released in December 2022, with submission to the Secretary of State to follow in March 2023 and formal adoption envisioned to be completed in September 2024.
- 2.4 To establish identified needs for which the Council need to positively plan for as part of its LPR, the Council has prepared an evidence base which includes establishing overall employment needs as set out within *the West Berkshire District Council Employment Land Review* (ELR) (dated December 2020).
- 2.5 Potential sites for employment-led development were originally promoted as part of the Council's 'Call for Sites' exercise which ran for an 18-week period between December 2016 and the 31<sup>st</sup> March 2017. The promoted sites were assessed against their suitability, availability and achievability as per the Council's *West Berkshire Housing and Economic Land Availability Assessment* (HELAA) which was first published in February 2020 and further updated in December 2020.
- 2.6 As part of the HELAA, it is our understanding that an insufficient number of office sites were promoted that would meet identified needs, therefore a subsequent Call for Office Sites has been undertaken (Nov -Dec 2021). These potential office sites will be assessed as part of an updated HELAA that will inform the Regulation 19 version of the LPR.
- 2.7 A summary of the Local Plan Review evidence base documents is provided in the following sub-sections.

### Local Plan Review Evidence Base

#### WBDC Employment Land Review

- 2.8 Stantec and Aspinall Verdi prepared the Council's employment needs assessment titled *West Berkshire District Council Employment Land Review* (ELR) dated December 2020.

#### INDUSTRIAL USE

- 2.9 The ELR indicates that the industrial market across the district is performing well with low vacancy rates and tight supply, particularly for smaller units. In practice this suggests the existing industrial stock should be protected. The ELR further notes there is a slight imbalance in forthcoming industrial led development in the district, with much of the future pipeline coming forward in the eastern part of the district, but very little coming forward in Newbury or other western parts of the district. Stantec note that the lack of industrial planning activity in Newbury given its strategic location advantages is surprising and notable, which together with their strong market demand findings, suggests the industrial market in Newbury is land constrained.



- 2.10 Regarding potentially identifying new sites for industrial allocation, the ELR highlights that none of the industrial sites promoted via the Council's original Call for Sites process are located in Newbury (they are elsewhere in the district), which is considered to be a geographical imbalance and could be made worse if redevelopment of parts of the LRIE for non-industrial development were to progress. As such, the ELR recommends the Council identifies additional land to meet identified needs and to continue to safeguard all Protected Employment Areas (PEAs) which would include parts of the WBDC owned sites within the LRIE.
- 2.11 Beyond protecting existing stock, to meet identified need over the 2020-2036 period, the ELR estimates there is a net requirement of an additional 16 hectares of industrial land to provide 62,000sqm (GIA) floor area within Use Class E(g)(iii), B2 and B8 across the district.
- 2.12 Para 6.60 of the ELR references that a number of potential industrial sites were promoted through the Council's original Call for Sites of which the Council identified 11 sites to be reviewed as part of the HELAA. Of these 11 sites, only 4 sites (ref. MD5, ALD3, ALD6 and ALD8) were considered suitable, available and achievable and are located in areas with strong market demand. In total, these 4 sites could provide a total of 12.7ha of industrial land. Overall, this represents a net shortfall of 4.3ha of employment land (against a need of c. 16ha/62,000sqm GIA floorspace) against identified needs set out within the ELR suggesting additional employment land needs to be allocated as part of the LPR.
- 2.13 The ELR also notes that one additional site (ref. LAM6) could potentially deliver 6.9ha of employment land but its suitability requires further consideration due to it being located within an AONB and potential highway concerns. The HELAA assessment concluded that the site was 'potentially developable' and we note the site was taken forward as a potential allocation within the Regulation 18 LPR (ref. EMP5 – Land west of Ramsbury Road) to deliver an indicative 27,600sqm of industrial floorspace.
- 2.14 Based on the Regulation 18 LPR, WBDC have provisionally allocated 5 parcels of land (ref. EMP 1-5) adjacent to existing Designated Employment Areas to deliver an additional c. 75,000sqm of industrial floorspace and are additionally proposing allocation of a new Designated Employment Area at 'Land north of Arlington Business Park, Theale' (ref. EMP6) for an additional c. 20,000sqm of industrial floorspace. Should these allocations be adopted following the LPR Examination in Public, this would ensure WBDC has site allocations to meet their identified industrial need of 62,000sqm (GIA) across the plan period. Given the draft LPR is not due for adoption until c. 2024, it is unclear whether or not these sites will actually be allocated for industrial led development.
- 2.15 Notwithstanding the above, we note the ELR references that of the 5 potential site allocations, none address the needs of the district's main market area, Newbury. No employment sites were put forward during the original Call for Sites for Newbury, and the ELR suggests that potential employment floorspace losses associated with the potential redevelopment of LRIE may exacerbate the supply position in Newbury.

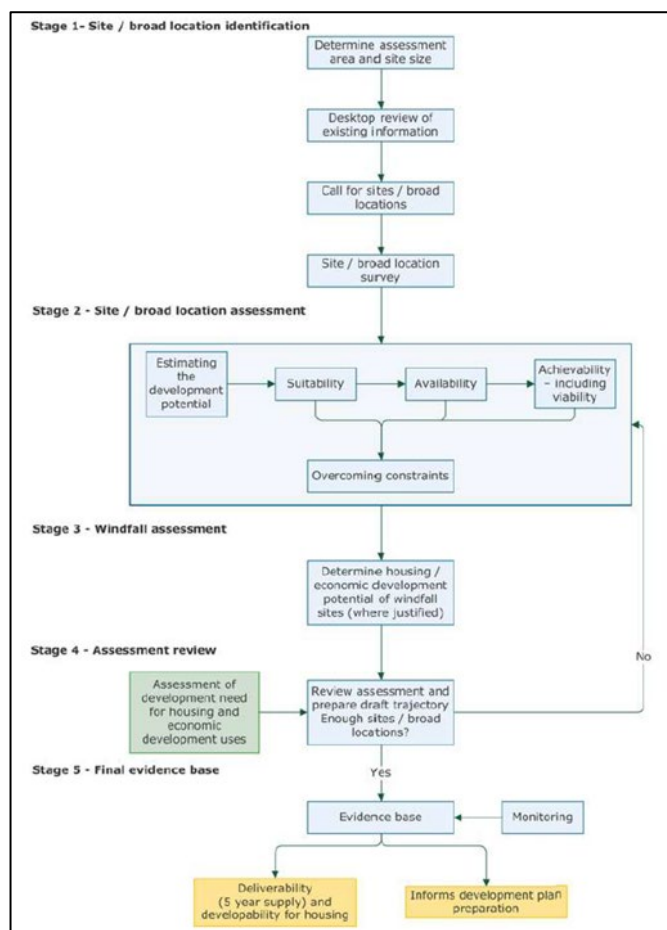
## OFFICE USE

- 2.16 Regarding office use, the ELR estimates there is a net requirement of an additional 11 hectares of office land to provide c. 65,000sqm (NIA) floor area to meet identified need over the 2020-2036 period.
- 2.17 The ELR notes that only one suitable site for major office development was promoted as part of the Council's original Call for Sites (HELAA ref. THE8). The site is 5.2ha in area and is considered to have a site capacity of c. 31,200sqm for office floorspace. This represents just under 50% of the Council's identified needs meaning the Council may need to identify a further 6ha of land to deliver c. 34,000sqm of office floorspace.

- 2.18 In Newbury, the ELR states that agents report a shortage of space in and around Newbury Town Centre, particularly modern offices for small and medium sized businesses. Despite this qualitative assessment by agents, no office sites were promoted within Newbury as part of the Council's original Call for Sites. As such, the Council undertook a new Call for Sites for Office Development between November – December 2021. It is our understanding that an updated HELAA assessing the suitability, availability and achievability of these sites has yet to be finalised and published by the Council.

## WBDC Housing and Economic Land Availability Assessment

- 2.19 In support of the LPR, the Council prepared the *West Berkshire Housing and Economic Land Availability Assessment* (HELAA) dated December 2020 which assesses sites across the district for allocation (for housing and employment uses) within the LPR based on their suitability, availability, and achievability. It should be noted the HELAA is a technical assessment, not a policy making document. Whilst the HELAA will identify potential sites, it will not allocate them for development or add weight to the site for the purpose of decision making on a planning application.
- 2.20 The HELAA is based on guidance set out in the Planning Practice Guidance (PPG) published in March 2014 and updated in July 2019. The PPG sets out five main stages of the Basic HELAA Methodology as shown below in **Figure 2**:



**Figure 2 - Basic HELAA Methodology (Source: Planning Practice Guidance)**

- 2.21 At present, we understand the Council has completed all of the HELAA stages to publish their Regulation 18 draft LPR.
- 2.22 At present, it is our understanding that given an insufficient number of sites have been put forward to meet identified office needs, so as per the Basic HELAA Methodology, WBDC have had to revert to Stage 2 which required WBDC to identify further sites that could be allocated for development to

meet their identified needs. We note, the HELAA Methodology is an iterative process and new sites are able to be submitted throughout the plan preparation process and therefore the Council regularly needs to return to earlier stages of the methodology whilst drafting local plan updates.

2.23 We set out the Stage 2 assessment methodology under which the subject sites should be assessed below:

**2A) DEVELOPMENT POTENTIAL**

- For sites proposing employment (B-class) uses, floorspace figures will be calculated using technical information on plot ratios included in the West Berkshire Employment Land Review, which sets a 0.4 plot ratio for industrial uses and 0.6 plot ratio for office uses.

**2B) SUITABILITY**

- Sites will be assessed against a range of factors and in consultation with external consultees. Factors that would be considered in terms of suitability would include (but are not limited to):
  - Land use designations (i.e. AONB, Town Centre, Protected Employment Area, etc);
  - Highways and access;
  - Flood risk/drainage constraints;
  - Landscape character and/or heritage/archaeology constraints;
  - Public health/education services;
  - Recreation provision;
  - Supporting economic growth;
  - Air quality, pollution and contamination;
  - Biodiversity and green infrastructure;
  - Minerals and waste; and
  - Additional considerations (i.e. planning history, etc)
- Based on feedback/advice provided by specialist advisors and taking all of the factors outlined above into account, a conclusion on overall suitability is reached. As per the WBDC joint methodology, each site is classified as ‘suitable’ / potentially suitable / suitability unknown / unsuitable as shown below in **Figure 3**. Those sites classified as ‘suitable’ or ‘potentially suitable’ or ‘suitability unknown’ progress to the next stage.

Suitability classification	
Suitable	<ul style="list-style-type: none"> <li>• The site offers a suitable location for development and there are no known constraints which significantly inhibit development for the defined use.</li> </ul>
Potentially suitable	<ul style="list-style-type: none"> <li>• The site offers a potentially suitable location for development but is subject to a policy designation which inhibits development for the defined use. The development plan process will determine the future suitability for the defined use.</li> </ul>
Suitability unknown	<ul style="list-style-type: none"> <li>• The site requires further assessment before a robust decision can be made on its suitability for being developed for the defined use.</li> </ul>
Unsuitable	<ul style="list-style-type: none"> <li>• The site does not offer a suitable location for being developed for the defined use or there are known constraints which significantly inhibit development. The site is unlikely to be found suitable for the defined use within the next 15 years.</li> </ul>

**Figure 3 - Suitability Classification (Source: Berkshire HELAA Methodology)**

- The existence of single or multiple constraints does not mean that a site is ‘unsuitable’. Instead, a view should be formed on balance, considering the site and any constraints as a whole. Similarly, a classification of ‘suitable’ or ‘potentially suitable’ does not mean that a particular development is suitable, nor that planning permission will be granted on the site in the future.
- In some instances, a site cannot be considered ‘unsuitable’ but also cannot be considered ‘suitable’ based on the information being considered, i.e. it will be ‘potentially suitable’ or suitability unknown’. For these sites, further information or additional studies will be required. Following publication of the HELAA, further information and undertaking additional studies, e.g. landscape sensitivity assessments, and transport modelling, may be required to demonstrate overall site suitability.

**2C) AVAILABILITY**

- As per the PPG, a site is considered available when, on the best information available, there is confidence that there are no legal or ownership problems, e.g. ransom strips, tenancies, existing uses requiring relocation, unresolved multiple ownerships.
- The ‘Call for Sites’ form included questions on the availability of the site. Where required, this information was supplemented with additional information from the landowner and when considering all the information, a conclusion on overall availability is reached. Only sites considered ‘available’, ‘potentially available’ or ‘availability unknown’ are able to progress to the next stage. The Availability Classification is shown below in **Figure 4**.

Availability classification	
Available	<ul style="list-style-type: none"> <li>• Confirmation of availability within the next 15 years has been received from the landowner and there are no known legal issues or ownership problems.</li> </ul>
Potentially available	<ul style="list-style-type: none"> <li>• The landowner or a third party with an interest has promoted the land but confirmation has not been received from the landowner that the land will be available within the next 15 years.</li> <li>• The land is in multiple ownerships and may have site assembly issues.</li> <li>• The land accommodates an existing use which would require relocation but arrangements are not in place to achieve this.</li> </ul>
Availability unknown	<ul style="list-style-type: none"> <li>• The landowner has not expressed an interest in promoting the site. Landownership remains unknown following investigations.</li> <li>• The landowner has expressed an interest in promoting the site in the past but has not responded to subsequent enquires for a period no shorter than three years.</li> <li>• The land is subject to legal issues upon which further information is required before a robust decision can be made on availability.</li> </ul>
Not available	<ul style="list-style-type: none"> <li>• The landowner has confirmed that the land is not available for development in the next 15 years.</li> <li>• The land is subject to known legal issues which are unlikely to be overcome within the next 15 years.</li> </ul>

*Figure 4 - Availability Classification (Source: Berkshire HELAA Methodology)*

**2D) ACHIEVABILITY (INCLUDING VIABILITY)**

- As per the PPG, a site is considered achievable where there is a reasonable prospect that the particular type of development will occur at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period.
- Typically, information provided within ‘Call for Sites’ forms regarding availability will also used to arrive at conclusions regarding achievability. Some assumptions need to be made on the basis of best information available. Only sites considered ‘achievable’, ‘potentially achievable’, or

'achievability unknown' are able to progress to the next stage. The Achievability Classification is shown below in **Figure 5**.

Achievability classification	
Achievable	There is a reasonable prospect that the site will be developed for the defined use within the next 15 years.
Potentially achievable	The achievability of the site is inhibited by an external factor where the timing of resolution is unknown. The delivery of the resolution will determine the future achievability of the site.
Achievability unknown	The site is subject to issues upon which further information is required before a robust decision can be made on achievability.
Unachievable	There is no reasonable prospect that the site will be developed for the defined use within the next 15 years.

*Figure 5 - Achievability Classification (Source: Berkshire HELAA Methodology)*

2.24 Whilst the entirety of the LRIE was promoted and assessed through the HELAA (Site ref. NEW1), neither of the two specific council controlled sites being considered as part of this addendum were specifically submitted as part of the Council's LPR 'Call for Sites' process. Nonetheless, the same Basic HELAA methodology can be utilised to assess the overall suitability, availability and achievability of the council controlled LRIE sites for future industrial-led development.

**2.25** As detailed above, most often additional supporting information would be submitted to demonstrate overall site suitability. Although much of this information is not presently available, we set out our initial thoughts on overall site suitability in the following section.

### 3. Key Planning Considerations

3.1 As set out within the LRIE DB the WBDC Development Plan is currently made of the following adopted documents, plus adopted Neighbourhood Development Plans (NDPs):

- West Berkshire Core Strategy Development Plan Document (2006 - 2026) adopted July 2012;
- West Berkshire Housing Site Allocations Development Plan Document adopted May 2017;
- West Berkshire District Local Plan 1991 - 2006 (Saved Policies 2007) as amended in July 2012 and May 2017;
- Replacement Minerals Local Plan for Berkshire, incorporating alterations adopted December 1997 and May 2001;
- Waste Local Plan for Berkshire adopted December 1998

3.2 As outlined previously, the Council is currently undertaking a Local Plan Review. While limited weight should be given to the Regulation 18 draft (as it is at such an early stage in its preparation), this has been reviewed to inform the conclusions of this addendum.

### Policy Designations & Framework

3.3 As per the WBDC adopted Core Strategy Proposals Map (online version), and the emerging Local Plan Review 2020-2037: Emerging Draft (Reg. 18 version – Dec. 2020), **Table 1** below details the adopted and emerging policy designations that are applicable to the two subject parcels (we note no draft emerging policies map is provided online – therefore the emerging policy designations are based on our current understanding of emerging policy):

**Table 1 - WBDC adopted and emerging policy designations**

LRIE Parcel	Adopted Policy Designations	Emerging Policy Designations
<b>13Q / 13P / 13O</b> (Former WBDC Operations Depot)	<ul style="list-style-type: none"> <li>- Settlement Boundaries: Newbury</li> <li>- Protected Employment Area (London Road Estate Newbury)</li> <li>- NDP Area: Newbury NCP</li> <li>- Landscape Character Assessment: Newbury</li> <li>- Landfill Sites: Faraday Rd Estate Newbury</li> <li>- Flood Zone 2/3</li> </ul>	<ul style="list-style-type: none"> <li>- Newbury and Thatcham Spatial Area</li> <li>- Urban Area: Newbury (Settlement Hierarchy)</li> <li>- Existing Designated Employment Area</li> <li>- Parking Zone 2</li> <li>- Flood Zone 2/3</li> </ul>
<b>13J</b> (Former football ground)	<ul style="list-style-type: none"> <li>- Settlement Boundaries: Newbury</li> <li>- NDP Area: Newbury NCP</li> <li>- Landscape Character Assessment: Newbury</li> <li>- Flood Zone 1/2/3</li> </ul>	<ul style="list-style-type: none"> <li>- Newbury and Thatcham Spatial Area</li> <li>- Urban Area: Newbury (Settlement Hierarchy)</li> <li>- Parking Zone 2</li> <li>- Flood Zone 1/2/3</li> </ul>

### **Parcel 13Q/13P/13O (former WBDC Operations Depot)**

- 3.4 As per the adopted Core Strategy, and as originally referenced within the LRIE DB, parcels 13Q/13P/13O are designated as being located within the adopted Protected Employment Area (PEA), and therefore the principle of industrial-led use/development within these parcels is firmly supported by policy.
- 3.5 The emerging Local Plan also supports the principle of industrial-led development within these parcels given they are located within a proposed Designated Employment Area (DEA).
- 3.6 The emerging LPR Policy SP1 (Spatial Strategy) also supports the principle of industrial-led development in this location given the strategy seeks to
- *“Directs development to areas of lower environmental value;*
  - *Optimises the use of previously developed land; and*
  - *Optimises the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment.”*
- 3.7 Policy SP1 also states that employment-led development to meet existing and future needs will be directed to Designated Employment Areas (DEAs) to help promote sustainable patterns of development, prioritise the use of previously developed land, and support the retention of employment uses.
- 3.8 Policy SP20 (Strategic approach to economic development and hierarchy of centres) seeks to make provision for 62,000sqm of office and 65,000sqm of industrial, storage and distribution floorspace. The draft policy states this will achieve through the creation of new DEAs and extension to existing DEAs (which are proposed for allocation as per draft Policy SP21).
- 3.9 Development Control Policy DC31 (Designated Employment Areas) states that proposals for employment uses will continue to be focused within DEAs and that proposals that would result in the net loss of employment floorspace will not be permitted.
- 3.10 Given the respective adopted/emerging policy designations for the parcels are located within a PEA/DEA, there is strong policy support for industrial-led development in this location.
- 3.11 We note the potential acceptability of developing these parcels would be subject to proposals being brought forward in accordance with other applicable development control policies (i.e. design, flood risk mitigation, access, parking standards, etc) which may include appropriate mitigation as required.

### **Parcel 13J (former football ground)**

- 3.12 As per the adopted Core Strategy, and as outlined within the LRIE DB, parcel 13J is not located within a PEA and therefore there is no current in principle support for industrial-led development in this location.
- 3.13 Parcel 13J's existing lawful use is as an outdoor sports facility. Paragraph 99 of the NPPF protects against the loss of outdoor sports facilities unless a number of policy tests can be satisfied. Paragraph 99 states

*“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- a) *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."*

- 3.14 Locally, Adopted Core Strategy CS18 (Green Infrastructure) protects against the loss of existing outdoor sports facilities and states: *"Developments resulting in the loss of green infrastructure or harm to its use or enjoyment by the public will not be permitted. Where exceptionally it is agreed that an area of green infrastructure can be lost a new one of equal or greater size and standard will be required to be provided in an accessible location close by."*
- 3.15 From an emerging policy context, Development Control Policy SP 10 (Green Infrastructure) states that where the loss of an outdoor sports facility is unavoidable, proposals must demonstrate what mitigation measures are proposed and/or that replacement green infrastructure will be provided. Additionally, any such replacement must seek to secure a net gain in lost functionality and be deployed as closely as possible to the affected green infrastructure.
- 3.16 As mentioned above, emerging Policy SP20 seeks to secure additional employment land where appropriate and seeks to establish new DEAs or expand existing DEAs to ensure identified needs can be met. Emerging Policy SP21 identifies a number of sites that are proposed for allocation that will form extensions to existing DEAs.
- 3.17 Policies that control the loss of the existing use must be satisfied in order to unlock the parcel for alternative uses and/or redevelopment. Subject to this, the principle of employment-led development in this location could be considered acceptable subject to demonstrating overall suitability. Subject to the above policy tests being met, any potential development would need to be brought forward in accordance with other applicable development control policies and that appropriate mitigation is provided where required.

### **Office/Town Centre Policy**

- 3.18 Should office-led development be pursued on either or both of the above referenced council controlled sites, adopted Core Strategy Policy CS9 states that Protected Employment Areas are designated for B Use Classes. Notwithstanding, Core Strategy Policy CS9 seeks to direct B1 office uses towards town and district centres as part of a 'town centre first' approach. If no suitable sites are available for B1 uses (now Use Class E(g)(i)) within existing town centres, then the sequential approach should be utilised, with the next preferable location being in edge of centre locations, or Protected Employment Areas.
- 3.19 Similarly, emerging Policy SP20 reiterates that new office development will be directed to Newbury Town Centre and other town and district centres in accordance with their major, town, district centre hierarchy. Development of offices outside existing town and district centres (which neither site is located within) will be required to demonstrate:
- There are no other sequentially preferable sites within or on the edge of centres and Designated Employment Areas (not in an edge or out of centre location); and
  - The vitality and viability of the existing town and district centres will not be adversely affected.



- 3.20 Demonstrating any proposal would not affect the vitality and viability of existing town centres suggests that an impact assessment would be required to support office-led proposals on either site, which we note is not consistent with NPPF paragraph 90 which requires impact assessments specifically for retail and leisure developments outside town centres.
- 3.21 In practice, Parcel 13J (former football ground) which is not currently located within a Protected/Designated Employment Area, would be considered 'edge of centre' in planning terms given it is located within 300m of the Newbury Town Centre boundary. Parcel 13Q/13P/13O (former WBDC operations depot) is located within a Protected/Designated Employment Area, but would not be considered edge of centre given it is c. 500m from the Newbury Town Centre boundary.
- 3.22 Given the adopted and emerging planning policy position, any potential application for office-led development on either or both sites would need to demonstrate there are no sequentially preferable sites within Newbury Town Centre, nor and sites in preferable or more accessible edge of centre locations, or in the case of Parcel 13Q/13P/13O no sequentially preferable sites elsewhere within the LRIE.
- 3.23 Additionally, any development proposal would need to be brought forward in accordance with relevant development management policies as per WBDC's Development Plan.

## Parcel Suitability

- 3.24 In accordance with the HELAA methodology outlined within the *West Berkshire Housing and Economic Land Availability Assessment* (HELAA) dated December 2020, we consider in **Table 2** below how the two council-controlled subject sites should be classified based on the HELAA suitability, availability, and achievability classifications.
- 3.25 To note, the assessment below is based on a desk-based review of information available at the time of writing. The entire LRIE site was previously assessed as part of the December 2020 HELAA but did not consider the subject sites in isolation. A detailed assessment to inform overall site suitability, availability and achievability would be required to inform any forthcoming updated HELAA which would be undertaken by WBDC planning/policy officers.

**Table 2 - HELAA Classification Assessment**

HELAA Classification	Parcel 13Q /13P/ 13O	Parcel 13J
<u>Suitability</u>	<p><b>'Potentially Suitable'</b></p> <p><u>Land use designations</u> – The site is located within a PEA (proposed DEA), is previously developed land and on that basis is considered suitable in land use terms for industrial use. For office use, subject to satisfying sequential test requirements, the site could be considered potentially suitable for office use.</p> <p><u>Highways and access</u> – The site benefits from existing access from the public highway. Potential highways impacts</p>	<p><b>'Potentially Suitable'</b></p> <p><u>Land use designations</u> – The site is not located within a PEA (proposed DEA) and its most recent lawful use was as an outdoor sports facility. Subject to satisfying the appropriate tests for loss/reprovision of the existing use, and satisfying sequential test requirements for office use, the principle of employment-led development would be considered suitable in land use terms.</p> <p><u>Highways and access</u> – The site benefits from existing access from the public</p>

HELAA Classification	Parcel 13Q /13P/ 13O	Parcel 13J
	<p>would likely be able to be addressed through detailed design/appropriate mitigation and is therefore considered suitable in highway terms.</p> <p><u>Flood risk/drainage constraints</u> – The site is located in Flood Zone 2/3. Industrial uses have a lower vulnerability rating and subject to detailed design it's considered any potential constraints could be addressed through appropriate mitigation and is therefore considered potentially suitable in flood risk/drainage terms. It is noted there is high groundwater 0.25-0.5m below surface which may limit the use of SUDS within the site.</p> <p><u>Landscape character and/or heritage/archaeology constraints</u> – The site nor its surroundings are subject to any heritage designations. The site is located in highly urbanised area and is not considered likely to generate any landscape harm and is considered suitable in landscape/heritage terms.</p> <p>Previous archaeological investigations in the area previously. Further desk-based assessments required to better understand archaeological potential and survival. Not considered significant constraint toward future redevelopment.</p> <p><u>Public health/education services</u> – The industrial use would not generate any demand for health or educational services and is considered suitable.</p> <p><u>Recreation provision</u> – The site is not in use as a recreation facility nor would generate any demand for additional recreation use and is therefore considered suitable.</p> <p><u>Supporting economic growth</u> – An industrial or office use would generate significant economic benefits through additional GVA and local employment and is considered suitable.</p>	<p>highway. Potential highways impacts would likely be able to be addressed through detailed design/appropriate mitigation and is therefore considered suitable in highway terms.</p> <p><u>Flood risk/drainage constraints</u> – The majority of the site is located in Flood Zone 1 with smaller areas being located within Flood Zone 2/3. Industrial uses have a lower vulnerability rating and it's considered any potential constraints could be addressed through detailed design and is therefore considered potentially suitable in flood risk/drainage terms. It is noted there is high groundwater 0.25-0.5m below surface which may limit the use of SUDS within the site.</p> <p><u>Landscape character and/or heritage/archaeology constraints</u> – The site nor its surroundings are subject to any heritage designations. The site is located in highly urbanised area but is located adjacent the Kennet &amp; Avon Canal East Conservation Area which may require sensitive design approach to ensure the character and setting of the conservation area is preserved.</p> <p>The Kennet &amp; Avon Canal is also considered to make a positive landscape contribution within Newbury. Subject to detailed design, and possibly providing suitable setbacks from the adjacent canal, it is not considered developing the site would generate any unacceptable landscape harm and is therefore considered suitable in landscape/heritage terms.</p> <p>Previous archaeological investigations in the area previously. Further desk-based assessments required to better understand archaeological potential and survival. Not considered significant constraint toward future redevelopment.</p>

HELAA Classification	Parcel 13Q /13P/ 13O	Parcel 13J
	<p><u>Air quality, pollution and contamination</u> The site is located on a known historic landfill site and has a likely high risk of contamination. It is unknown the scale of contamination within the site, nor the remediation requirements associated with its redevelopment but is considered that the site could be remediated to an acceptable standard, subject to cost considerations, detailed design and a less vulnerable proposed end use and is therefore considered potentially suitable.</p> <p>The A4, A339, and Newbury Air Quality Management Area are nearby and therefore there is a significant risk of Particulate Matter and Nitrogen Dioxide. Notwithstanding, air quality concerns are considered likely able to be addressed through detailed design and is considered potentially suitable in air quality terms.</p> <p><u>Biodiversity and green infrastructure</u> – We are unaware of the presence of any protected species or habitat within the site. Given the site is closely located to the Kennet &amp; Avon Canal (which is a Site of Special Scientific Interest (SSSI)) and there are known priority habitats, priority species and statutory sites within c. 500m of the site, which may be sensitive from any adjacent development or discharging into the watercourse from the site, further detailed investigation of ecological constraints would be required to inform site suitability.</p> <p>Subject to further investigation, plus consideration regarding how biodiversity net gain could be achieved, it is likely a detailed design/mitigation strategy could be progressed to ensure the site is potentially suitable in biodiversity/green infrastructure terms. Further detailed investigation would be required.</p>	<p><u>Public health/education services</u> – An industrial or office use would not generate any demand for health or educational services and is considered suitable.</p> <p><u>Recreation provision</u> – The existing use is as an outdoor sports facility. Subject to satisfying the appropriate policy tests for its loss/reprovision, the proposed use would be considered potentially suitable.</p> <p><u>Supporting economic growth</u> – The industrial use would generate significant economic benefits through additional GVA and local employment and is considered suitable.</p> <p><u>Air quality, pollution and contamination</u> The site is unknown if it is subject to any historic contamination or contamination linkages from adjacent sites. Subject to appropriate ground investigations and detailed design, it is considered that any potential constraints could be suitably addressed.</p> <p>The A4, A339, and Newbury Air Quality Management Area are nearby and therefore there is a significant risk of Particulate Matter and Nitrogen Dioxide. Notwithstanding, air quality concerns are considered likely able to be addressed through detailed design and is considered potentially suitable in air quality terms.</p> <p><u>Biodiversity and green infrastructure</u> – We are unaware of the presence of any protected species or habitat within the site, but given the site is located directly adjacent to the Kennet &amp; Avon Canal (which is a Site of Special Scientific Interest (SSSI)) and there are known priority habitats, priority species and statutory sites within 500m of the site, which may be sensitive from any adjacent development or discharging into the watercourse from the site, further detailed investigation of</p>

HELAA Classification	Parcel 13Q /13P/ 13O	Parcel 13J
	<p><u>Minerals and waste</u> – The site is located within a proposed Mineral Safeguarding Area. Safeguarding policies will apply in order to prevent needless sterilisation of mineral resources. Consideration of extraction prior to any development would be encouraged, but not necessarily required. The site is not allocated for waste development. The site is considered suitable in mineral and waste terms.</p> <p><u>Additional considerations</u> – We note the site is located adjacent to a Calor Gas facility, which would need to be considered in more detail and consultation with the HSE should be considered to confirm the proposed industrial or office use would be suitable in health and safety terms.</p>	<p>ecological constraints would be required to inform site suitability. A suitable buffer from the SSSI may be required.</p> <p>Subject to further investigation, plus consideration regarding how biodiversity net gain could be achieved, it is likely a detailed design/mitigation strategy could be progressed to ensure the site is potentially suitable in biodiversity/green infrastructure terms. Further detailed investigation would be required.</p> <p><u>Minerals and waste</u> – The site is located within a proposed Mineral Safeguarding Area. Safeguarding policies will apply in order to prevent needless sterilisation of mineral resources. Consideration of extraction prior to any development would be encouraged, but not necessarily required. The site is not allocated for waste development. The site is considered suitable in mineral and waste terms.</p>
<u>Availability</u>	<p><b>‘Available’</b></p> <p>This classification is on the basis the parcel is council controlled and are not subject to any long leases and Plot 13Q and 13O are on short-term leases.</p>	<p><b>‘Potentially Available’</b></p> <p>This classification is on the basis the parcel is council controlled and that the parcel is currently vacant but would be subject to reversion of the existing use which we understand the Council is currently progressing towards a resolution.</p>
<u>Achievability</u>	<p><b>‘Potentially Achievable’</b></p> <p>This classification is on the basis that it is unknown what the potential cost constraints are regarding the remediation of the historic land use within the parcels. Otherwise the site is considered achievable in the short term.</p>	<p><b>‘Potentially Achievable’</b></p> <p>This classification is on the basis that although not currently resolved, we understand that alternative provision for the existing use is progressing towards a resolution which would provide the opportunity for the parcel to be brought forward for alternative land use(s).</p>

## 4. Potential Development Capacity

- 4.1** In order to inform potential development capacity for both subject sites, we have adopted the standardised approach outlined within the Council's HELAA, which suggests for industrial-led development this should be based on a plot ratio of 0.4 for industrial use and a 0.6 plot ratio for office use. It should be noted, this plot ratio is only used for high-level capacity testing – it does not take into account site-specific constraints which may need a revised plot ratio figure (i.e. surface water drainage requirements, biodiversity buffers, etc).
- 4.2** In practice a 0.4 industrial plot ratio means that on average the floorspace capacity of a site will equate to 40% of the total site area. For example, a site which totals 1,000sqm in site area is assumed to be able to accommodate approximately 400sqm of internal floor area. In practice, it is likely that through detailed design that a proposed industrial-led scheme may be able to achieve a plot ratio of greater than 0.4, but similarly site constraints may reduce this figure below a standardised 0.4 plot ratio capacity.
- 4.3** Additionally, we have considered potential industrial-led development capacity against assumptions set out within the LRIE DB masterplan which were progressed on the basis that policy compliant levels of parking provision and open space would be incorporated within each given site/parcel.

### Baseline Site Area

- 4.4** For baseline purposes, **Table 3** below outlines the parcel sizes in terms of hectares and square metres which has been based on parcel sizes provided within the 'Vacant Possession Categories – Developable/Non-Developable Parcels' plan that was prepared by WSP and appended to the LRIE DB. It should be noted that there is no guidance or mention within the Council's HELAA methodology regarding whether the square metre figures are comprised of Gross Internal Area (GIA) or Gross External Area (GEA), but we have assumed they are GIA figures given this measurement is utilised within the Council's *Employment Land Review* (August 2020).

**Table 3 - Baseline Parcel Area Figures**

Parcel	Site Area (hectares)	Site Area (square metres)
13Q	0.22	2,200
13P	0.52	5,200
13O	0.15	1,500
13J	1.41	14,100

### HELAA Plot Ratio

- 4.5** Based on the standardised 0.4 plot ratio for industrial-led development and 0.6 plot ratio for office-led development outlined within the Council's HELAA, we estimate in **Table 4** below the potential development capacity (in floor area) the subject sites should be able to bring forward for either use. We note these are only indicative figures and each subject site would need to be subject to detailed design to provide a more accurate estimate.

**Table 4 - Potential Development Capacity - HELAA Plot Ratio**

Parcel	Site Area (hectares)	Site Area (square metres)	Industrial Plot Ratio	Industrial Development Capacity (square metres - GIA)	Office Plot Ratio	Office Development Capacity (square metres - GIA)
13Q	0.22	2,200	0.4	880	0.6	1,320
13P	0.52	5,200	0.4	2,080	0.6	3,120
13O	0.15	1,500	0.4	600	0.6	900
13J	1.41	14,100	0.4	5,640	0.6	8,460

4.6 On the basis of the plot ratio assessment outlined in Table 4, we estimate each subject site could approximately support the delivery of:

- Parcel 13Q/13P/13O (Former WHBC Operations Depot):
  - Industrial use: **3,560sqm GIA floor area**
  - Office use: **5,340sqm GIA floor area**
- Parcel 13J (Vacant sports ground):
  - Industrial use: **5,640sqm GIA floor area**
  - Office use: **8,460sqm GIA floor area**
- **Total:**
  - **Industrial use: 9,200sqm GIA floor area**
  - **Office use: 13,800sqm GIA floor area**

## Development Brief Masterplan Plot Ratio

- 4.7 To determine plot ratio based on the principles applied within the LRIE DB, we have calculated plot ratio based on site area of plots that were proposed specifically for 'light industrial' use against their stated site area figures provided within the 'Vacant Possession Categories – Developable/Non-Developable Parcels' plan prepared by WSP.
- 4.8 We note there were no office only plots promoted within the LRIE Development Brief, therefore we cannot provide any further analysis based on office use specific plot ratios.
- 4.9 **Table 5** below summarises the various site area, proposed floor area (GEA) and associated plot ratios for each relevant reference industrial plot.

**Table 5 - Potential Development Capacity - Masterplan Plot Ratio**

LRIE DB Plot No.	Parcel No.	Site Area (square metres)	Proposed Floor Area (square metres - GIA)	Plot Ratio
<b>INDUSTRIAL USE ONLY</b>				
1	13X/W	1,700		
	13U	2,500		
	13T	1,800		
	13S	3,300		
	<b>TOTAL</b>	<b>9,300</b>	<b>2,850</b>	<b>0.30</b>
3	13Q	2,200		
	13P	5,200		
	13O	1,500		
	<b>TOTAL</b>	<b>8,900</b>	<b>2,550</b>	<b>0.28</b>

4.10 On the basis of the plot ratio assessment outlined in Table 5 and an average plot ratio of 0.29, we estimate each subject site could approximately support the delivery of:

- Parcel 13Q/13P/13O (Former WHBC Operations Depot): **2,550sqm GIA floor area**
- Parcel 13J (Vacant sports ground): **4,089sqm GIA floor area**
- **Total: 6,639sqm GIA**

## 5. Conclusion

- 5.1 In summary, we note there is in-principle support for industrial-led redevelopment of parcel 13Q, 13P, 13O (the former WBDC Operations Depot) given this site is located within an adopted Protected Employment Area, which at present is proposed to be retained as a Designated Employment Area within the emerging Local Plan Review. There are a number of environmental constraints associated with the site (i.e. historic landfill contamination, flood risk and an adjacent HSE facility), but should not pose overall constraints to development subject to detailed design and appropriate mitigation as required. Should office uses be considered, any development proposal would need to satisfy sequential testing and relevant policy tests.
- 5.2 Subject to meeting the appropriate policy tests associated with the loss/reprovision of the vacant outdoor sports facility, we consider there would be strong justification for pursuing employment-led development within Parcel 13J and also allocating the land within an expanded LRIE Designated Employment Area as part of the Council's ongoing Local Plan Review given the site's location adjacent to the LRIE, it's edge of town centre location (subject to sequential testing) and on the basis that known constraints (i.e flood risk, heritage, drainage and biodiversity constraints) could likely be addressed and mitigated through detailed design. Further investigations may be required to demonstrate overall site suitability as part of the Council's ongoing HELAA review should allocation of the site be pursued.
- 5.3 For industrial uses, based on a 0.4 plot ratio suggested within the Council's HELAA we estimate the two council controlled sites could support approximately **9,200sqm GIA** of industrial floor area. Should the 0.29 plot ratio generated from the LRIE DB masterplan be applied, we estimate the two council controlled sites could support approximately **6,639sqm GIA** of industrial floor area.
- 5.4 For office uses, based on a 0.6 plot ratio suggested within the Council's HELAA we estimate the two council controlled sites could support approximately **13,800sqm GIA** of office use.
- 5.5 The potential suitability, availability, and achievability of the two council controlled sites would need to be considered further as part of a detailed assessment of the sites in future, but subject to an appropriate evidence base being prepared alongside an appropriate detailed design strategy, we believe both sites should be considered further by the Council for future employment-led development as part of its ongoing Local Plan Review.



# Contact details

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### Avison Young

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## Comment

Consultee	[REDACTED] (1335104)
Email Address	[REDACTED]
Company / Organisation	West Berkshire Council as landowner
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	West Berkshire Council as landowner ([REDACTED] - 1335104)
Comment ID	PS690
Response Date	03/03/23 13:14
Consultation Point	Policy SP 21 Sites Allocated for Employment Land ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Bookmark	West Berkshire Council as landowner

### 1. Do you consider the Local Plan Review is legally compliant?

*Please see the guidance note for an explanation of what 'legally compliant' means*

Yes

### 2. Do you consider the Local Plan Review is sound?

*Please see the guidance notes for an explanation of what 'soundness' means.*

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

*Please tick all that apply:*

**Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where** . Yes

**practical to do so and is consistent with achieving sustainable development.**

**Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.** . Yes

**Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.** . Yes

**Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.** . Yes

### **3. Do you consider the Local Plan Review complies with the Duty to Co-operate?**

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

Yes

### **4. Proposed Changes**

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Propose extension of London Road Industrial Estate Designated Employment Area to cover land to the south currently comprising a playing field, a car park and open space - see area shaded in green in attached plan.

This is in line with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at <https://info.westberks.gov.uk/lrie>

Propose additional paragraphs in the supporting text to align with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at <https://info.westberks.gov.uk/lrie>:

7.29 The London Road Industrial Estate has scope for intensification of employment use within the plan period to maximise the potential of the site. Some mixed use development may be appropriate, provided that no net loss of employment floorspace results from that development.

7.30 The Council-owned London Road Industrial Estate (LRIE) currently has an estimated 23,000 sqm of employment space (Avison Young Development Brief 2020) occupied by 36 businesses that employ about 300 people. Following a review taking into account evolving economic drivers, market demand and the district's ambition to be carbon neutral by 2030, a revised Delivery Strategy for LRIE approved by Executive on 9/6/22 aims to increase employment floorspace on the site by at least 30%, safeguard 300 jobs and create at least 200 new jobs by 2030.

7.31 The Council as freeholder will work with leaseholders to deliver environmental enhancements on the site including on carbon net zero, nutrient neutrality, sustainable drainage and biodiversity net gain. Further details to be set out in an LRIE Place-making Strategy which will be submitted as a Supplementary Planning Document in due course and progressed through the statutory planning process in parallel with the Local Plan Review.

7.32 The Council as landowner is promoting alternative provision outside the LRIE to mitigate the loss of the playing field. This approach is supported by Sport England and aligns with the Council's Playing Pitch Strategy. The exact location of the alternative provision will be determined at the point at which a planning application for redevelopment of the playing field is submitted, accepting that it is for the statutory planning process to determine whether or not redevelopment of the former football ground should be permitted.

## 5. Independent Examination

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?** Yes

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

To represent the rationale of the proposal.

## 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply*

- |  |   |     |
|--|---|-----|
| <b>The submission of the Local Plan Review for Independent Examination</b>                   | . | Yes |
| <b>The publication of the report of the Inspector appointed to carry out the examination</b> | . | Yes |
| <b>The adoption of the Local Plan Review</b>   | . | Yes |

### Upload a document

Please use this function if you would like to upload a document that supports your comment. Please note that your formal comments must still be made above, where relevant. Individual documents should not exceed 10MB.

[LRIE DEA extension.png](#)

13I

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## Comment

Consultee	[REDACTED] (1335104)
Email Address	[REDACTED]
Company / Organisation	West Berkshire Council as landowner
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	West Berkshire Council as landowner ([REDACTED] - 1335104)
Comment ID	PS693
Response Date	03/03/23 13:16
Consultation Point	Policy DM 32 Designated Employment Areas ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	West Berkshire Council as landowner

### 1. Do you consider the Local Plan Review is legally compliant?

*Please see the guidance note for an explanation of what 'legally compliant' means*

Yes

### 2. Do you consider the Local Plan Review is sound?

*Please see the guidance notes for an explanation of what 'soundness' means.*

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

*Please tick all that apply:*

**Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where** . Yes

**practical to do so and is consistent with achieving sustainable development.**

**Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.** . Yes

**Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.** . Yes

**Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.** . Yes

### **3. Do you consider the Local Plan Review complies with the Duty to Co-operate?**

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

Yes

### **4. Proposed Changes**

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

**If not included in supporting text for SP21 as proposed above**, propose including instead in the supporting text of DM32, with the wording below, to align with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at <https://info.westberks.gov.uk/lrie>:

12.11 In addition, the London Road Industrial Estate has scope for intensification of employment use within the plan period to maximise the potential of the site. Some mixed use development may be appropriate, provided that no net loss of employment floorspace results from that development.

12.12 The Council-owned London Road Industrial Estate (LRIE) currently has an estimated 23,000 sqm of employment space (Avison Young Development Brief 2020) occupied by 36 businesses that employ about 300 people. Following a review taking into account evolving economic drivers, market demand and the district's ambition to be carbon neutral by 2030, a revised Delivery Strategy for LRIE approved by Executive on 9/6/22 aims to increase employment floorspace on the site by at least 30%, safeguard 300 jobs and create at least 200 new jobs by 2030.

12.13 The Council as freeholder will work with leaseholders to deliver environmental enhancements on the site including on carbon net zero, nutrient neutrality, sustainable drainage and biodiversity net gain. Further details to be set out in an LRIE Place-making Strategy which will be submitted as a Supplementary Planning Document in due course and progressed through the statutory planning process in parallel with the Local Plan Review.

12.14 The Council as landowner is promoting alternative provision outside the LRIE to mitigate the loss of the playing field. This approach is supported by Sport England and aligns with the Council's Playing Pitch Strategy. The exact location of the alternative provision will be determined at the point at which a planning application for redevelopment of the playing field is submitted, accepting that it is for the statutory planning process to determine whether or not redevelopment of the former football ground should be permitted.

## 5. Independent Examination

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?** Yes

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

To present the rationale for the proposal

## 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply*

**The submission of the Local Plan Review for Independent Examination** . Yes

**The publication of the report of the Inspector appointed to carry out the examination** . Yes

**The adoption of the Local Plan Review** . Yes