

128 Cardiff Road, Reading

**Application to Vary Condition 28 of Planning
Permission 210007**

Planning Statement

August 2023

Prepared on Behalf of Collard Environmental Ltd.



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1.0 INTRODUCTION

1.1 THE APPLICATION

- 1.1.1 Tetra Tech is submitting this planning application to vary condition 28 of planning permission 210007 on behalf of Collard Environmental Limited (Collard) at their existing recycling facility on Cardiff Road in Reading. The applicant is seeking permission to allow a small number of HGV vehicle movements at the site, outside of the current permitted hours.
- 1.1.2 Collard has successfully secured a supply contract for 50,000 tonnes per annum of residual waste to be managed at the new 50MW Slough Heat & Power Plant on the Slough Industrial Estate in Berkshire. This plant will be operated 24 hours / 7 days per week and planning conditions require residual waste to be delivered evenly throughout the day and night except for peak traffic hours of 07:30 to 09:30 and 16:30 to 18:30.
- 1.1.3 The proposals would see the residual waste that is generated at the site to be used as the feedstock in the Heat and Power Plant.
- 1.1.4 This contract enables Collard, the borough and surrounding area to divert more waste away from landfill, which in turns reduces their carbon footprint and provides much needed fuel for electricity production 24 hours, 7 days per week.
- 1.1.5 This material has been processed to remove all recyclable material and this residual waste has a low to zero recycling value. This material is currently being disposed of through landfill. Collard aims to be a zero waste to landfill company and therefore wishes to avoid sending this residual waste to landfill.
- 1.1.6 Condition 28 of the sites current planning permissions controls the hours that HGVs can enter and leave the site. The reason for this condition is *'to protect local residents from unreasonable disturbance arising from the use in accordance with Policies: EM1 and EN16 of the Reading Borough Local Plan 2019.'* Vehicles access the site from Trafford Road and use Cardiff Road, Cow Lane, and Richfield Avenue to access the strategic road network. Vehicles do not pass any residences to access the strategic road network.
- 1.1.7 The site is remote from sensitive neighbours and is within the Richfield Avenue Employment Area, a large industrial area. It is not considered that the proposal would cause an unacceptable impact on amenity from allowing a limited number of HGV movements outside of the current operational hours.

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- 1.1.8 This planning statement provides a review of the site's history and background and a review of the proposals demonstrating accordance with national policy and the Development Plan. Whilst the proposals are minor in nature this Planning Statement also includes a review of the impact of the proposed development on communities and the environment in respect of relevant policies.

1.2 THE APPLICANT

- 1.2.1 Following the acquisition of Raymond Brown Waste Solutions in 2019, the Collard Group has become one of the largest privately-owned waste management companies and one of the leading recycling specialists in the south of England operating from nine recycling facilities across five counties with 150 lorries and 4,000 skips.
- 1.2.2 Collard waste recycling and collections operations cover Oxfordshire, Berkshire, Hampshire, Wiltshire, and Surrey and have the capacity to process over 1m tonnes of waste and recycled aggregates every year.
- 1.2.3 Collard is a family-owned business founded in 1994 by Robert Collard. Since then, Collard have grown year-on-year into a professional multi-disciplined provider of demolition, recycling, waste management, haulage, aggregates, and earthworks as well as supplying high-grade secondary aggregates and sustainably produced ready-mixed concrete.
- 1.2.4 Collard offers a range of services and products to the construction industry and domestic customers with a core focus on sustainability and a zero-to-landfill target.

1.3 APPLICATION CONTENTS

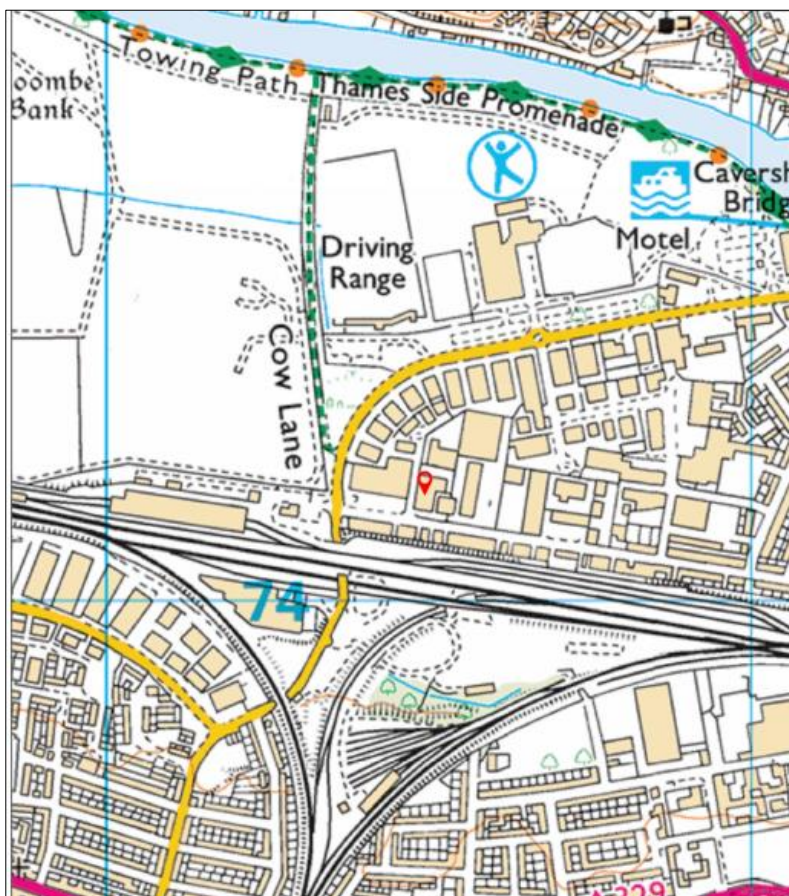
- 1.3.1 This planning application comprises: -
- Application Form & Certificates;
 - Planning Statement; and
 - Application Drawings (Application Plan).

2.0 THE SITE

2.1 LOCATION, DESCRIPTION AND SETTING

- 2.1.1 The application site is located on the junction of Cardiff Road and Trafford Road in Richfield Avenue Employment Area in Reading. The Reading Borough Local Plan (RBLP) 2019, describes the designated employment area (EM2g) as a large industrial area.
- 2.1.2 The main access point to the site is from Trafford Road. Access to the Strategic Road Network is from Cardiff Road, Cow Lane, and Richfield Avenue. Junction 11 of the M4 is around 7km from the site and Junction 10 is around 10km from the site.
- 2.1.3 The site location is shown on Figure 1 below:

Figure 1: Site Location



License Number 100022432

- 2.1.4 The site comprises two large warehouses and an external yard to the rear.
- 2.1.5 The site is surrounded by industrial type buildings in all directions.
- 2.1.6 Beyond the immediate surroundings of the site, a train line is around 70m to the south. Agricultural land is to the west and north of the Richfield Avenue Employment Area. The River Thames is around 600m to the north of the site.
- 2.1.7 The nearest houses are around 300m to the east of the site on Cardiff Road. HGV access to Collard's site is from the west and HGVs relating to the site do not pass these houses.

3.0 PLANNING HISTORY

- 3.0.1 Waste management related work at the site was permitted when a change of use planning permission (09/01818/FUL) was granted in 2010 for a construction and commercial waste recycling operation.
- 3.0.2 Subsequent permissions were granted for the erection (11/01745/FUL) and demolition (11/01872/FUL) of buildings in 2012.
- 3.0.3 Planning permission (13/00304/FU) was granted for the erection of a new loading bay and 2 storey office in 2013.
- 3.0.4 The extant planning permission (210007) was for additional demolition and construction works which included an extension to the existing waste recycling facility. This permission was granted in 2021.

4.0 PROPOSED DEVELOPMENT

4.0.1 The applicant is seeking permission to allow a maximum of six HGV vehicle movements in and six HGV vehicle movements out of the site Monday - Saturday, outside of the current permitted hours. It is proposed to allow a maximum of seven HGV vehicle movements in and seven HGV vehicle movements out of the site on Sundays and Bank Holidays, outside of the current permitted hours.

4.0.2 Condition 28 of planning permission 210007 states: -

No machinery shall be operated, no process shall be carried out and no deliveries taken at or dispatched from the site outside the hours of 0700-1900 Monday-Saturday; and 0900-1800 Sundays and Bank Holidays. This is except for twelve two-way daily HGV movements that are permitted to enter the site 1900-0700 Monday - Saturday and for fourteen two-way daily HGV movements that are permitted to enter the site 1800-0900 on Sundays and Bank holidays. The only activity allowed within the building in the night-time hours would be the loading of the HGVs with residual waste.

REASON: In order to protect local residents from unreasonable disturbance arising from the use in accordance with Policies: EM1 and EN16 of the Reading Borough Local Plan 2019.

4.0.3 It is proposed that the condition is updated by adding the wording shown in bold. We are open to suggestions for suitable wording of the condition.

4.0.4 The applicant is not proposing any other amendments to existing planning conditions or the site operations and these would remain as per the existing planning permission. No processing would be required in the proposed night-time working hours, the HGVs would simply need to be loaded with residual waste and this would take place within the existing building.

4.1 SUMMARY OF REQUIREMENTS

4.1.1 Collard has successfully secured a supply contract for 50,000 tonnes per annum of residual waste to be managed at the new 50MW Slough Heat & Power Plant on the Slough Industrial Estate in Berkshire. This plant will be operated 24 hours / 7 days per week and planning conditions require residual waste to be delivered evenly throughout the day and night except for peak traffic hours of 07:30 to 09:30 and 16:30 to 18:30.

4.1.2 The proposals would see the residual waste that is generated at the site to be used as the feedstock in the Heat and Power Plant.

- 4.1.3 This contract enables Collard, the county and surrounding area to divert more waste away from landfill, which in turns reduces their carbon footprint and provides much needed fuel for electricity production 24 hours, 7 days per week.
- 4.1.4 This material has been processed to remove all recyclable material and this residual waste has a low to zero recycling value. This material is currently being disposed of through landfill. Collard aim to be a zero waste to landfill company and therefore wishes to avoid sending this residual waste to landfill.
- 4.1.5 The material would be sent out of the site on up to six HGV movements (Monday – Saturday) on hours currently outside of the permitted hours to provide the required frequency for the Slough Heat & Power Plant. Seven additional movements out are proposed on Sundays and Bank Holidays as the site's operational hours are currently shorter on these days and an even supply of residual waste to the heat and power plant is required.

5.0 PLANNING POLICY

- 5.0.1 This section reviews the key planning policies at the national and local levels which apply to the proposed development.

5.1 NATIONAL POLICY

- 5.1.1 National policy is within the National Planning Policy Framework (NPPF) 2021 and sets out the Government's key overarching policies and principles which apply to achieve sustainable development.
- 5.1.2 In setting out the three dimensions of sustainable development, - economic, social and environmental, the NPPF states (paragraph 8) that in fulfilling the environmental role the planning system should protect and enhance our natural, built and historic environment, through methods including '*using natural resources prudently*' and '*minimising waste*'. The site achieves this through waste material recovery, enabling the management of waste up the waste hierarchy and recycling for re-use. The site helps directly with these principles.
- 5.1.3 The acceptance of the residual waste for management at the Slough Heat & Power Plant on a 24-hour basis would have significant environmental and sustainability benefits. This would help prevent waste being disposed of at landfill.
- 5.1.4 'Our Waste, Our Resources: A Strategy For England' published in December 2018 sets out a national policy framework with respect to waste. The document describes how the use of resources will be optimised through minimising waste, promoting resource efficiency, and progressing to a circular economy. The strategy provides a longer-term policy direction commensurate with the UK Governments 25 Year Plan to Improve the Environment, published in January 2018. The Government's 25-year plan includes aims to maximise resource efficiency and minimise environmental impacts. The plan includes a commitment to achieve a target of zero avoidable waste by the end of 2050.
- 5.1.5 As above, this proposal promotes resource efficiency through providing source material to generate electricity.
- 5.1.6 National waste planning policy is contained within the National Planning Policy for Waste (October 2014) (NPPW) which is to be read in conjunction with the NPPF and the national waste strategy 'Our Waste, Our Resources'.

5.1.7 The NPPW states that:-

‘Positive planning plays a pivotal role in delivering this country’s waste ambitions through:-

- *Delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy; and*
- *Helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment.’*

5.1.8 NPPW defines the Waste Hierarchy as follows:-

Figure 2: The Waste Hierarchy



5.1.9 The principal objective of the Waste Hierarchy is to minimise the amount of waste produced by adopting economy and efficiency in raw materials usage. Where this is not possible, the aim is to deal with the waste produced in a reasonable and sustainable way, with the least preferred option being disposal to landfill. The overall objective being to minimise the environmental impact both in the short term via prevention of pollution and in the long term, in terms of resource and land usage.

5.1.10 The waste management facility recycles waste for re-use. The proposed night-time deliveries would help manage residual waste through ‘other recovery’, and away from landfill disposal.

5.2 LOCAL POLICY

- 5.2.1 Alongside national planning policy, the Development Plan for this application includes the policies of the adopted Reading Borough Local Plan (RBLP) 2019 and the adopted Central and Eastern Berkshire Joint Minerals and Waste Plan (JMWP). The Joint Minerals and Waste Plan was adopted by Reading Borough Council in January 2023.
- 5.2.2 **JMWP Policy DM1: ‘Sustainable Development’** states: *‘The Central & Eastern Berkshire Authorities will take a positive approach to minerals and waste development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework’.*
- 5.2.3 **RBLP Policy CC1: ‘Presumption in Favour of Sustainable Development’** also includes the above sentiment.
- 5.2.4 **JMWP Policy DM2: ‘Climate Change – Mitigation and Adaption’** states: *‘Minerals and waste development will be supported that: a. contributes towards mitigating the causes of climate change by: i. Being located and designed to encourage the sustainable use of resources...’*
- 5.2.5 **JMWP Policy W1: ‘Sustainable Waste Development Strategy’** states: *‘The long term aims of the Plan are to provide and/or facilitate sustainable management of waste for Central and Eastern Berkshire in accordance with all of the following principles...a. Demonstrate how waste will be managed at the highest achievable level within the waste hierarchy...’*
- 5.2.6 It is considered this proposal comprises sustainable waste management, as described in paragraph 5.1.10. The residual waste has been processed to remove all recyclable material and has a low to zero recycling value. This material is currently being disposed of through landfill. A Strategic Objective of the JMWP is to *‘Encourage a zero waste economy whereby landfill is virtually eliminated (excluding inert materials) by providing for increased recycling and waste recovery facilities including energy recovery’.* Paragraph 5.12 of the JMWP states: *‘Minerals and waste development can provide opportunities to mitigate and adapt to the effects of climate change, including... Generation of renewable energy from energy recovery facilities...’*
- 5.2.7 The acceptance of a small number of HGVs to transport residual waste in the night-time will allow a feedstock of material to be taken to a recovery facility that produces electricity. This will help divert waste from landfill which is also in accordance with sustainable development and waste hierarchy. There is no overall increase in HGV movements as this material is currently taken out of site for disposal at landfill.
- 5.2.8 It is therefore in accordance with these development plan policies.
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5.3 COMMUNITIES AND THE ENVIRONMENT

- 5.3.1 The site has been a permitted waste recycling facility since 2010 and the impacts from its operations have always been acceptable, and indeed several additional planning permissions have been subsequently approved since the operations commenced.
- 5.3.2 This application is not looking to change its operations but is simply looking to allow a limited number of vehicle movements outside of the hours currently permitted. The reason for the planning condition, as stated in the sites planning permission, is *'to protect local residents from unreasonable disturbance arising from the use in accordance with Policies: EM1 and EN16 of the Reading Borough Local Plan 2019'*.
- 5.3.3 The junction of Trafford Road and Cardiff Road, where the HGVs will turn into to enter the site is around 340m from the nearest house, which is to the east on Cardiff Road. The proposals will not cause an impact as the HGVs access Cardiff Road from the west away from the houses. The site is remote from sensitive neighbours, and it is not considered that the proposal would cause an unacceptable impact on amenity from night- time deliveries. The HGVs would be loaded with residual waste within the existing site buildings.
- 5.3.4 The proposals are therefore in accordance with JMWP **Policy DM9: 'Protecting public health, safety and amenity'**, JMWP **Policy DM15: 'Site History'**, RBLP **Policy CC8: 'Safeguarding Amenity'**, RBLP **Policy EN15: 'Air Quality'** and RBLP **Policy EN16: 'Pollution and Water Resources'**. These policies allow for development that do not result in unacceptable amenity impacts.

6.0 CONCLUSIONS

- 6.0.1 Tetra Tech is submitting this planning application to vary condition 28 of planning permission 210007 on behalf of Collard Environmental Limited (Collard) at their existing recycling facility on Cardiff Road in Reading.
- 6.0.2 The applicant is seeking permission to allow a small number of HGV vehicle movements at the site, outside of the current permitted hours.
- 6.0.3 The applicant is not proposing any other amendments to existing planning conditions or the site operations and these would remain as per the existing planning permission.
- 6.0.4 Condition 28 of the sites current planning permissions controls the hours on which HGVs can enter and leave the site and the reason for this condition is *'to protect local residents from unreasonable disturbance arising from the use in accordance with Policies: EM1 and EN16 of the Reading Borough Local Plan 2019.'*
- 6.0.5 The junction of Trafford Road and Cardiff Road, where the HGVs will turn into to enter the site is around 340m from the nearest house, which is to the east on Cardiff Road. The proposals will not cause an impact as the HGVs access Cardiff Road from the west away from the houses. The site is remote from sensitive neighbours, and it is not considered that the proposal would cause an unacceptable impact on amenity from night- time deliveries. The HGVs would be loaded with residual waste within the existing site buildings.
- 6.0.6 It is therefore considered that the proposal is in accordance with the development plan, including all policies relating to amenity.
- 6.0.7 The acceptance of residual waste in the night-time will allow a feedstock of residual waste to be taken to a recovery facility that produces electricity. This will help divert waste from landfill which is also in accordance with sustainable development and waste hierarchy.