



September/ October 2020 – Central & East Berkshire Joint Minerals & Waste Plan – Proposed Submission Plan (hereafter referred to as the ‘CEB M&W Proposed Plan’)

Comments from the Colne Valley Park Community Interest Company

Overview

1. These comments are made in response to the CEB M&W Proposed Plan in relation to its effect on the Colne Valley Regional Park.
2. The Colne Valley Regional Park (CVRP) is the first large taste of countryside to the west of London; an area for people, wildlife and many uses, including farming and angling. The Park, founded in 1965, stretches from Rickmansworth in the north to Staines and the Thames in the south, Uxbridge and Heathrow in the east, and to Slough in the west. The parishes of Wraysbury and Horton and part of Datchet are located within the Regional Park.
3. It is championed by the Colne Valley Park Community Interest Company (CVPCIC), which is submitting these comments. The CVPCIC is mindful of the potentially significant impact mineral and waste works could have on the Park.
4. The CIC's locus is to protect and enhance the Regional Park through six objectives, namely:
 - I. To maintain and enhance the landscape, historic environment and waterscape of the park in terms of their scenic and conservation value and their overall amenity.
 - II. To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
 - III. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
 - IV. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
 - V. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
 - VI. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.
5. The Park's six objectives align with national planning policy. We highlight paragraph 141 in the 2019 NPPF:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”
6. This policy context is particularly relevant to the green zone between Horton, Colnbrook and Poyle, where further mineral extraction and waste handling sites are proposed (see Map 1 below). This is a particularly fragile and critical part of

the Metropolitan Green Belt area with a strategic role for local communities and London generally. The Colne Valley Way is a long-distance active travel route that passes through this zone.

7. We are aware the area between Horton, Colnbrook and Poyle has been the subject of mineral and waste activity for many years, yet we have seen no comprehensive improvement plan from the Council: the area suffers from 'planning blight' that degrades the local environment. The difficulties encountered by people trying to access this zone in order to enjoy the natural environment only serves to heighten the importance of getting its protection and enhancement right. The statement below, in the supporting July 2020 'Restoration Study' for the Council, lends weight to our approach.

3.40 As gravel extraction in the Colne Valley continues, with pressure for more gravel extraction in the future, it is crucial that the afteruse and restoration of mineral workings within and adjacent to the park is integrated with the key principles and priorities of the Colne and Crane Valleys Green Infrastructure Strategy 2019 in order to maximise environmental and community benefits. In this regard, it is important that site restoration plans enable the enhancement of the network of cycleways and footpaths to improve connectivity and public access across the park.

Restoration Study (July 2020)

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CVRP Headline Comment

Whilst there has been some informal engagement with officers since 2018, we have yet to see a substantive response to our 2018 representations. We strongly believe individual site proposals for this critical part of the CVRP and Green Belt should only be considered in the context of a holistic/zone-wide strategy for restoration and improvement, which any specific proposals then positively contribute to.

The current proposals in the CEB M&W Proposed Plan involves a fragmented set of four proposals with further incursions into this zone, not only for (no doubt lengthy) 'temporary' uses, but also for permanent and 'inappropriate' ones in the Green Belt.

The end result for this most sensitive part of the Green Belt and CVRP causes us grave concern.

The steps proposed by the Council will not fulfill the objectives for the Park, and will lead to the harmful loss of a strategically important natural resource.

In this context the CVRP objects to the individual proposals for this zone. A clearer and positive vision for the end state for the natural environment (and access to it) across this zone, with more sensitively crafted proposals, is needed. With the right planning approach this area has the potential to offer important health benefits to the community, and a valuable environment for wildlife.

The CVRP remains committed to working constructively with the Royal Borough and its agents to this end.

CVRP Detailed Comments on Policies

M4 (Locations for sand and gravel extraction)

8. We object to this policy because in our view it supports the extension of sites at Horton Brook & Poyle Quarry, Horton (MA1) and Poyle Quarry, Horton (MA2). The reasons for this are set out below against those proposed allocations.

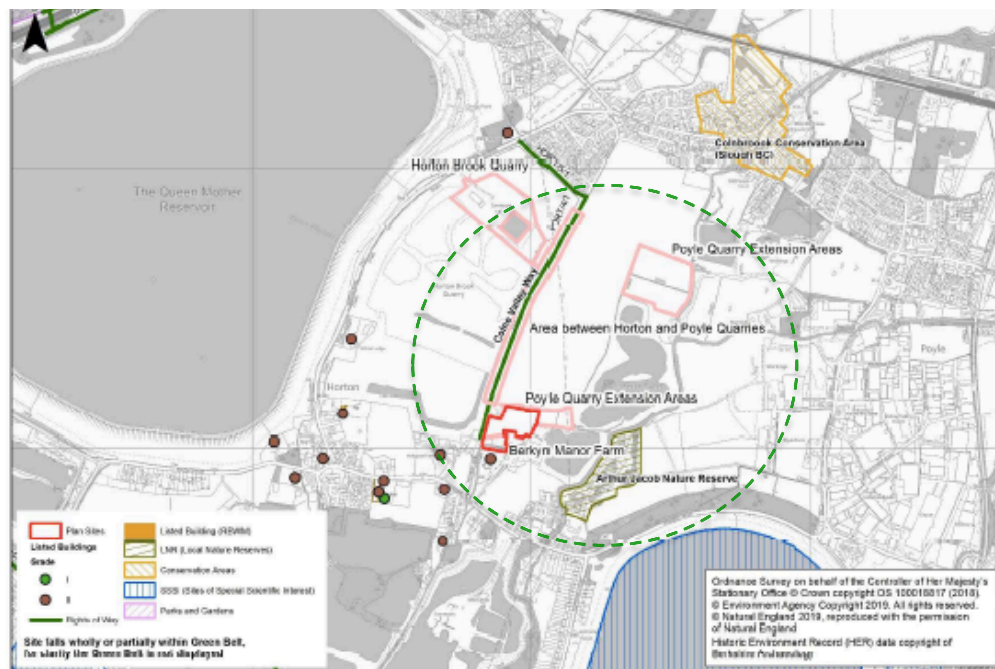
W2 Safeguarding of waste management facilities

9. We object to this policy because in our view it supports the safeguarding of the existing entirely unsatisfactory and unauthorised 'Allwaste (Berkshire) Limited' facility in Foundry Lane, Horton (see paragraph 25 on pages 6 and 7). It also supports the safeguarding of the two sites, WA1 (Berkyn Manor Farm) and WA2 (Horton Brook Quarry) to which we object, as set out below.

CVRP Detailed Comments on Site Proposals

10. Our objections are in relation to:

Site Reference	Site Name	Location	Local Plan Authority	Proposal
WA 1	Berkyn Manor Farm	Horton	RBWM	Waste Management
WA 2	Horton Brook Quarry	Horton	RBWM	Waste Management
MA 1	Horton Brook and Poyle Quarry Extension	Horton	RBWM	Sand and Gravel Extraction
MA 2	Poyle Quarry Extensions	Horton	RBWM	Sand and Gravel Extraction



Map 1 – identifying the proposed sites we object to (within the green dashed circle and outlined in red/ light red – between Horton, Colnbrook and Poyle).

Site Proposal WA 1 (Berkyn Manor, Horton)

11. We object to the proposal for introduction of a green waste and/ or energy recovery facility for the following key reasons:
- It will urbanise further this part of the CVRP and Green Belt, detracting from the natural environment, and introduce intrusive large vehicles into this area/ village.
 - It will detract from the wider setting of nearby listed buildings.
 - There is no adequate and exhaustive search justification for allocating this site in the Green Belt and CVRP. We disagree with the analysis and conclusions at paragraphs 3.23 and 3.25 in the supporting 'Waste: Proposals Study (July 2020)'.
 - The proposed allocation, together with the other mineral and waste proposals in this zone, demonstrate a lack of appreciation of the need for careful strategic planning for this area as an enhanced green corridor and Green Belt between Horton, Colnbrook and Poyle.
 - The proposed allocation is not clear in terms of exactly how access would be obtained. From the red line area the only direct vehicular access on to a public highway is to the upper part of Foundry Lane that forms part of the Colne Valley Way, as shown on the Ordnance map. This is (and should on all occasions) be attractive for walking/cycling/horse riding as part of a longer distance recreational route. Its use for access to a waste site would be unsatisfactory and entirely at odds with this aim.
 - The photographs in Annex 1 illustrate the unacceptable situation arising from the unauthorised processing of waste to the north of Berkyn Manor Farm.
 - There is inadequate provision for compensatory improvements to the "environmental quality and accessibility of remaining Green Belt land" alongside this proposed release of Green Belt land for development, in line with paragraph 138 of the NPPF (2019).
 - In the light of the above, the proposal does not represent sustainable development, and is at odds with government policy.
12. If, contrary to our position, the site proposal is progressed, it should include development requirements that lead to improved 'active travel' connectivity for the whole zone around this site, developing the proposals in the 2019 C&C Green Infrastructure Strategy.
13. We note that in the supporting SA/ SEA report (pages 267 onwards) it is recorded that the site is in the Green Belt and shown as red.

Site Proposal WA 2 (Horton Brook Quarry)

14. We object to the proposal for an inert recycling facility for the following key reasons:
- It will urbanise further this part of the CVRP and Green Belt, detracting from the natural environment.
 - The facility will represent an isolated, piecemeal development within a wider area that has to deliver site restoration, bringing the land back to a 'green' state consistent with its Green belt status.

- There is no adequate and exhaustive search justification for allocating this site in the Green Belt and CVRP. We disagree with the analysis and conclusions at paragraphs 3.23 and 3.25 in the supporting Waste: Proposals Study (July 2020).
 - The proposed allocation, together with the other mineral and waste proposals in this zone, demonstrate a lack of appreciation of the need for careful strategic planning for this area as an enhanced green corridor and Green Belt between Horton, Colnbrook and Poyle.
 - There is inadequate provision for compensatory improvements to the “environmental quality and accessibility of remaining Green Belt land” alongside this proposed release of Green Belt land for development, in line with paragraph 138 of the NPPF (2019).
 - In the light of the above, the proposal does not represent sustainable development and is at odds with government policy.
15. If, contrary to our position, the site proposal is progressed, it should include development requirements that lead to improved ‘active travel’ connectivity for the whole zone around this site, developing the proposals in the 2019 C&C Green Infrastructure Strategy.
16. We note that in the supporting SA/ SEA report (pages 267 onwards) it is recorded that the site is in the Green Belt and shown as red, but no consideration has been given to this aspect.
17. We note the site area shown is stated to be “55ha”. We assume this is an error.

Site Proposal MA 1 (Horton Brook and Poyle Quarry Extension)

18. We object to the proposal for mineral extraction on the route of the Colne Valley Way (CVW) for the following key reasons:
- Extraction activity so close to the CVW alignment will detract from its attractiveness as a route. This is the only north to south off-road route between the M25 and Slough, and is a crucial part of the connectivity through the Colne Valley.
 - The CVW affected by this proposal is part of a strategic route but, within the red line site allocation, insufficient land is available to achieve a satisfactory and attractive alternative route with mitigation, in user and landscape terms.
 - In line with our concern in the preceding bullet point, we note that the supporting Strategic Landscape and Visual Assessment (July 2020) document includes this statement at page 4: “This scheme allows the opportunity to divert the path along a more attractive route to the east via the Eric Mortimer Rayner Memorial lakes”.
 - This corridor provides refuge habitat for wildlife with quarries so close by.
 - In the absence of a clear policy and strategy for achieving a satisfactory diversion, the very small contribution this site could make to the supply of minerals is outweighed by the disruption that would be caused. We are also concerned that hedgerows/trees could be lost and wildlife connectivity adversely affected.
19. If, contrary to our position, the site proposal is progressed, it should include a much wider site area with mitigation and restoration requirements that lead to

improved 'active travel' connectivity for the whole zone around this site. More imaginative and beneficial diversion proposals that develop the aims set out in the 2019 C&C Green Infrastructure Strategy.

20. We are open minded about how long term betterment for this part of the CVRP could come about, and see scope for a temporary and permanent bridleway broadly following the Colne Brook corridor with suitable bridge crossing point(s) over the river, including better access to the Arthur Jacobs Nature Reserve. This is a long-held initiative embodied in earlier proposals.
21. We note that on page 134 of the Reg. 19 consultation document (under Landscape and Townscape, second bullet point) there is reference to a Joint Connectivity Statement. This is not a public document and was drafted in the context of proposed expansion of Heathrow Airport with a third runway. We must also point out that more local authorities than those listed were involved.

Site Proposal MA 2 (Poyle Quarry Extensions)

22. We object to the proposal for mineral extraction close to the Colne Valley Way (CVW), the Arthur Jacob Nature Reserve and the Colne Brook corridor for the following key reasons:
- The CVW, Arthur Jacob Nature Reserve and the Colne Brook corridor are important features contributing to the natural environment and extraction activity so close to them will detract from their value in this sensitive zone
 - The reference on page 138 (under Landscape and Townscape) stating: "Consideration needs to be given to the realignment of the Colne Valley Way, and the quality of its setting", lacks precision.
 - The statement (under Transport on page 138) that: "Provision of a new access will be required, most likely onto Poyle Road", lacks precision, and we note that local roads, including Foundry Lane, are completely unsuited for use by the heavy traffic associated with mineral extraction.
 - The risk to the Colne Brook corridor, which is valuable for its flora and fauna, providing refuge habitat for wildlife.
23. If, contrary to our position, the site proposal is progressed, it should include a much wider site area and mitigation requirements that lead to improved 'active travel' connectivity for the whole zone around this site. More imaginative and beneficial diversion proposals need to be provided to meet the aims set out in the 2019 C&C Green Infrastructure Strategy, and form part of a clear policy for area-wide mitigation and restoration in this zone.
24. We are open minded about how long term improvement of this part of the CVRP could come about, but the introduction of a bridleway broadly following the Colne Brook corridor with suitable bridge crossing point(s) over the river, including better access to the Arthur Jacobs Nature Reserve ,should be part of this. This is a long-held initiative embodied in earlier proposals.

Appendix E to the CEB M&W Proposed Plan Consultation Document (Safeguarded sites)

25. We object to the inclusion, on page 189 in Appendix E – Safeguarded sites (under the category of 'Waste Transfer Station') of the Allwaste (Berkshire) Limited

facility in Foundry Lane, Horton. This is a completely unsatisfactory site, an unauthorised operation that detracts from the area in many ways – see photographs in Annex 1. This site is the subject of separate correspondence with the Council and needs to be brought under proper planning and other controls.

Annex 1

Photographs of problems on the Colne Valley Way associated with existing waste site to the north of Berkyn Manor Farm

