

President: Rt.Hon. the Lord Randall of Uxbridge Kt.PC.

FAO Samantha Murphy, Case Officer, Planning, Surrey CC

By email: MWCD@surreycc.gov.uk



February 2022

Dear Ms Murphy,

Planning Application No: SP21/01831/SCC and SCC Ref: 2019/0215

King George VI Reservoir and Hithermoor Quarry

The Colne Valley Regional Park (CVRP) organisation is charged with protecting and improving the area covered by the Park and we consider that this application will have a harmful impact on it. We therefore object to the application for reasons set out below. We begin with some context and then set out more specific concerns.

Context and need for a strategic approach to improving the environment of the area around the King George VI Reservoir and Hithermoor/ Stanwell Moor

The whole of the application site lies within the Colne Valley Regional Park and is designated as Green Belt. This is an area of great potential - for the natural environment it can provide over the long term for both residents of and visitors to the area, which includes the wonderful countryside environment around the River Colne and Staines Moor.

However, this is also a fragile area of countryside where urban influences, including the working of minerals and processing of waste material, can significantly detract from its countryside qualities and the community's enjoyment of it.

It is therefore crucial that every opportunity is taken, both as part of temporary activities and through the detail of site restoration schemes, to create a legacy of high quality natural environment and high quality connectivity for active travel. Only in this way will we realise the benefits for biodiversity, the environment generally and for our community.

The CVRP was established to achieve this environmental improvement and it is also what the authorities need to plan for, so as to bring the best out of the Green Belt, as called for in national planning policy.

Promoting this environmental improvement and better connectivity was central to the Colne and Crane Green Infrastructure Strategy <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>. This covered this area and was agreed via the Heathrow Strategic Planning Group (including Surrey CC and Spelthorne BC) in 2019. It has influenced our response and should similarly influence the Council's.

Colne Valley Park Trust

Charity Registration Number: 1181303

Colne Valley Park Community Interest Company

A company limited by guarantee. Registered in England. Company No. 08131867

Registered Office: c/o Colne Valley Park Visitor Centre, Denham Court Drive, Denham, Buckinghamshire, UB9 5PG
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We highlight below some extracts from national planning policy (the 2021 NPPF) to reinforce our objections and concerns:

92. "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which ... c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities and layouts that encourage walking and cycling"

100. "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails."

145. "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"

Please note that our objections are guided by the six objectives of the CVRP, which are set out in Annex 2 to this letter. These objectives are consistent with, and further, the Green Belt designation.

Specific Objections and Concerns

1. As we set out in our opening 'context' section this site is in an area with great potential value for its natural environment. The development, including the waste disposal component, consolidates an inappropriate use, both in terms of Green Belt policy and local environment. The locality has suffered greatly over several years from the workings, processing, visual intrusion and high volume of traffic movements.
2. We believe a point has been reached whereby it should not just be a matter of accepting 'very special circumstances' and the case for development/ extraction. It is time for restoration of the whole site to be implemented to give back something to the local community and environment generally.
3. Whilst presented as 'temporary' the extended period (at least 15-16 years) for this proposal will be harmful to the environment and wildlife. We do not subscribe to the argument that this is a short-term impact that will not be significant. The reservoir is designated as part of the SW London Waterbodies Special Protection Area and RAMSAR site for birds of national and international importance. We consider that the infrastructure proposed and related disturbance, with likely lighting, will detract from the environment and feeding conditions (including zooplankton) for those birds.
4. Noise from the conveyor and from the materials processing area will all detract from the relative tranquility of the area. Whilst there may be existing background noise the objective here should be to avoid adding to such noise so that people's enjoyment of getting out into the natural environment is as good as it can be.
5. There is inadequate information available to enable a proper assessment of the full impact of the development e.g. of the pipeline and conveyor, its impact on River Colne/ hydrology and using out of date ecological surveys. We see that some appendices to reports are also missing.

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6. If the Council is minded to be sympathetic to this proposal the harm arising from this proposal must be offset and mitigated by:
 - a. Taking the opportunity to improve accessibility to/ from the site for walking and cycling, to link up with the public rights of way around the site. Only in this way will the restored area realise its value for the community. This is illustrated in Annex 1.
 - b. Details of installations and works that will endure for many years (at least 15/16 it would appear) must not be utilitarian installations e.g. the bailey bridge but of design and materials that will be sympathetic in this rural environment.
 - c. A financial contribution of £6,000 a year to the CVRP, to contribute to management and enhancement of the natural environment in the area around this site (in collaboration with landowners and relevant organisations), to endure for the life of this temporary development.

We ask that our objections are taken into account and the application refused or, if notwithstanding those objections, the Council is minded to approve, to incorporate the mitigation set out in 6 above.

Yours sincerely,

Jerry Unsworth

J C Unsworth MRTPI (Planning Consultant, for and on behalf of the Colne Valley Regional Park)

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Annex 1 – Important access points (foot/ cycle) to ensure connectivity of the restored site with the wider area

The locations where connections will be important are highlighted by brown circles and a brown line (indicative only). It may be that a connection is already provided for where the dashed brown circle is (in the south-west corner) but no connections at the locations on the eastern side are apparent at all.

The CVRP will be pleased to be engaged in discussions about the detail of these connections.



Map extract from proposed site restoration scheme included with documents on the planning application website.

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Annex 2 – The Colne Valley Regional Park’s Six Objectives

The Colne Valley Park Community Interest Company exists to protect and enhance the Regional Park through six objectives:

- 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.

The Colne Valley Regional Park broadly follows the ‘braided’ rivers centred on the River Colne from Staines to Rickmansworth and coincides with the Green Belt on the western edge of London.

Its purpose is to promote the enhancement of the area as a natural resource for the community, wildlife and the environment. The successful management and improvement of this area requires a strategic approach and careful planning.

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