

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

FAO: Jeffrey Ng MRTPI
Planning Service
Royal Borough of Windsor and Maidenhead
Town Hall,
St Ives Road,
Maidenhead
SL6 1RF



August 2022

Dear Jeffrey

Colne Valley Regional Park Response to Application 22/01492/FULL: Proposed inert waste recycling facility on land East of Horton Road, Horton

The Colne Valley Regional Park (CVRP) objects to this application for the key reasons set out below. Supporting information about the context, including the CVRP's objectives, is included in the attached annex.

1. This site lies within a sensitive and vulnerable part of the Green Belt and CVRP where a strategic approach is needed to avoid incremental erosion of the Green Belt and maintain its integrity and improve it as a countryside resource.
2. The application introduces an inappropriate use in the Green Belt (GB) – a permanent facility for the recycling of inert waste.
3. Permission for temporary minerals extraction at this site was agreed (in 2008 and then 2018 on condition that the land would be fully restored to agriculture, with removal of bunding).
4. Whilst temporary minerals extraction is an exception to the general presumption against development in the GB a proposal for the recycling of inert waste on a permanent basis is not.
5. Such a proposal in the GB, outside of and in advance of any development plan allocating the site, requires very special circumstances (VSC) to be demonstrated and impacts fully assessed. We argue that the correct procedures have not been followed with this application and it should be rejected on that ground alone.
6. This proposal will not only cause harm to the GB (explained below) but it will also be prejudicial to the outcome of the emerging East Berkshire Minerals and Waste Plan. The Planning Statement accompanying the application misinterprets government policy in the NPPF when it says at Para 6.3:

“Paragraph 14 of the NPPF requires that development proposals that accord with the development plans should be approved without delay. Therefore given that the Recycling Site is an existing minerals and waste facility there should be strong support in favour of the retention of existing sites.”

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
www.colnevalleypark.org.uk

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7. The only permission we are aware of at this site is for temporary minerals extraction, with site restoration required upon conclusion of the extraction operations (which should be around now). No permanent waste recycling facility has been agreed.
8. If this application were to be approved it would run counter to the whole rationale of the 'parent' permission (the 2008 decision as extended by the 2018 decision), which required restoration of the land to agriculture.
9. Restoration to agriculture would maintain the openness of the Green Belt and would be in line with the objectives of the CVRP (and Green Belt policy nationally). In contrast this proposal would so obviously involve the introduction of an urban use and activity on a permanent basis. This would be evident from:
 - The frequent lorry movements and processing activity/ waste storage within the site and ancillary structures
 - The incongruous bunds in a valley floor landscape that should be, broadly, flat (the local exceptions being the reservoir banks which contribute positively to the landscape)
 - The industrial type of access
10. As well as adversely impacting on the character of the area and openness of the Green Belt this will prevent the introduction of a more appropriate use and the sort of improvements to the natural environment (and access to it) that the CVRP promotes.
11. Improving the Green Belt is a long-term strategy, and the NPPF calls on local planning authorities to "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." Once opportunities are lost, they are gone forever.
12. We are aware that a S106 legal agreement is in place affecting this site. We ask that nothing is permitted that undermines its provisions.
13. We are also particularly concerned that assurances are maintained around the agricultural future of the whole site. Fragmentation of the site only contributes to our concerns about that future.

Thank you for taking our views into account.

Yours

Jerry Unsworth

Planning Consultant

For and on behalf of the Colne Valley Regional Park

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ANNEX 1

Colne Valley Regional Park – Six Objectives

1. **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.
2. **To safeguard the countryside** of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. **To conserve and enhance biodiversity** within the Park through the protection and management of its species, habitats and geological features
4. **To provide opportunities for countryside recreation** and ensure that facilities are accessible to all.
5. **To achieve a vibrant and sustainable rural economy**, including farming and forestry, underpinning the value of the countryside.
6. **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 beneficial side of the Green Belt and the CVRP's role in it

1. Once GBs are defined, NPPF Para 141 calls on local planning authorities to “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.”
2. The CVRP was established in 1965 with the support of a consortium of Local Authorities (including the RBWM's predecessors) to protect and improve this part of the Metropolitan GB, so partly fulfilling the Council's role as set out in Para 141. The CVRP's six objectives (set out above) mirror Para 141 and how proposed developments 'perform' against those objectives is a highly relevant consideration.
3. It is now well established that the natural environment and recreation opportunities provided by the Green Belt offer a critical physical and mental health resource for the wider population, as well as being a resource for wildlife. Its protection and enhancement for the long term is fundamental to the role of the CVRP. Once that resource is lost to development, it is lost forever.

The particular sensitivity of this part of the Metropolitan Green Belt

4. The tests for assessing the potential acceptability of 'inappropriate' development in the GB may be the same wherever its location, but the spatial context of the part of GB the site is in must also be factored into decision-making. It should also inform the nature of any mitigation.
5. The application site is situated close to the edge of the main London urban area in a particularly sensitive and vulnerable part of the Green Belt. It represents a piece of what should be open countryside, without urban activity, close to Colnbrook.

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6. To promote that careful attention and planning, the CVRP CIC collaborated with a number of other organisations, including the relevant local authorities, to produce the Colne and Crane Green Infrastructure Strategy during 2019. It provides useful guidance on how to best to address the many challenges threatening the area, and is intended to be used alongside – and to inform Development Plans as well as to “ ... inform both the design of development proposals and their comprehensive mitigation and planning obligations.” It can be found here:
<https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>

Farming as a key part of the beneficial side of the Green Belt and the CVRP

1. A vibrant agricultural economy is an essential ingredient for underpinning, enhancing and maintaining the Green Belt. It is one of the above six objectives of the CVRP and is particularly important where a green buffer is under direct and intense pressure from urban areas close by.
2. The planning consent for gravel extraction formally acknowledged the agricultural value of the land, and clearly stated it must be returned to farming use on completion of the temporary mineral extraction.
3. There are numerous examples of enterprising agricultural techniques being used to restore former mineral sites to greater productivity. Agriculture can also underpin other access, biodiversity and landscape objectives. It is a fundamental tenet of Green Belt designation and is the key part of what keeps the Green Belt green.
4. The Covid-19 pandemic has dramatically altered purchasing patterns, with demand now focused increasingly on local food supply, highlighting the value of a working food landscape. Once this land is gone, it cannot be used to produce food in the future.
5. None of this is to say that agriculture is the only acceptable use, other uses and initiatives can foster enhancement of the natural environment and public access to it.

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