

Introductory and Overview Statement on behalf of the Colne Valley Park Trust

Please note: This statement relates to all representations

1. This document is an introductory statement that applies to all our representations and provides a context for them. It also provides a short overview of concerns with the Plan.
2. This response has been prepared by Jerry Unsworth MRTPI, an independent Planning Consultant, in consultation with and on behalf of the Colne Valley Park Trust.
3. The Colne Valley Park Trust oversees the Colne Valley Regional Park (CVRP).
4. The Colne Valley Regional Park is the first substantial taste of countryside to the west of London. The Park stretches from Rickmansworth in the north to Staines and the Thames in the south, and from Uxbridge and Heathrow in the east, to Slough and Chalfont St Peter in the west.



5. It was founded in 1965 when local authorities for the area showed great foresight in agreeing to work together to preserve and enhance this precious area for recreation and nature conservation.
6. The Park is supported by more than 80 member organisations including local authorities, businesses, residents' associations, environmental charities and user groups.
7. The Park has Trustees and a Board. They commission local environmental charity Groundwork South to undertake the practical day-to-day running of the Regional Park. Further information can be found at: <https://www.colnevalleypark.org.uk/>

8. The work of the Colne Valley Regional Park is guided by its six objectives <https://www.colnevalleypark.org.uk/whats-special/> which are structured under the following headings:
 - Landscape:** 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
 - Countryside:** To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design
 - Biodiversity:** To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
 - Recreation:** To provide opportunities for countryside recreation and ensure that facilities are accessible to all
 - Rural Economy:** To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
 - Community:** 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.
9. These objectives are consistent with the government's protection of the Green Belt and policy provided for in the National Planning Policy Framework (NPPF).
10. The section of the CVRP in Spelthorne Borough represents the first major part of the Metropolitan Green Belt outside of London. It is an area under great pressure and vulnerable to incremental change through urbanising influences. We welcome the Council prioritising accommodating development needs on 'brownfield' land and (generally) protecting the Green Belt from development that may undermine its purposes (NPPF Para 138). However, a critical role for the local planning authority which it does not, but needs to, emphasise in the Plan is as set out in Para 154 (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.”
11. We draw attention to the fact that the CVRP, as an organisation, is active in implementing initiatives that fulfil this positive role. We look forward to partnering with the Council to this end, in particular on the production of a document to create the best possible green and blue infrastructure networks to enhance their biodiversity and landscape value, and their contribution to combatting climate change and improving access to such networks by active travel, for the health and well-being of the community.
12. Jerry Unsworth, MRTPI, has worked as an independent Planning Consultant since 2014 and prior to that was Head of Planning & Sustainability at Wycombe District Council (Buckinghamshire) where Green Belt covered about 48% of its land area. Prior to that his positions included leading the Planning Policy service. As an independent consultant

Jerry's commissions have included:

- a) Advising and acting for Buckinghamshire Local Authorities on the mitigation of the HS2 rail project
- b) Working on mitigation for the proposed Heathrow 3rd Runway (hosted by the CVRP), a project with major implications for the Green Belt in the Park
- c) Planning Advisor to the District Council's Network (national umbrella group)

13. As an overview the CVRP welcomes:

- that the Council is accommodating most development needs without recourse to areas of Green Belt within the CVRP
- that the Plan includes a policy to establish principles for considering any proposals within the CVRP part of the Borough

14. However, there are a couple of proposed development sites with harmful impact on the CVRP and a policy embracing Heathrow expansion that has the potential to give rise to significant development pressure within the CVRP. There are also opportunities to seek wider improvements to the CVRP that need to be embraced by the Plan.

Part B

Name or Organisation: Colne Valley Park Trust

3. To which part of the Local Plan does this representation relate?

(Important: Please submit separate Part B forms for each)

Paragraph Policy/ Site ID/Ref Policies Map

Other (Please specify)

4a. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="text" value="X"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

(Please indicate with an 'X' as appropriate)

4b If you think the Local Plan is not sound, please indicate the reason(s) why:

Not Positively Prepared	<input type="text"/>
Not Justified	<input checked="" type="text" value="X"/>
Not Effective	<input type="text"/>
Not Consistent with National Policy	<input checked="" type="text" value="X"/>

See separate Representation Form Guidance Note further information on 'soundness'

(Please indicate with an 'X' as appropriate)

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Our objection to this policy (Meeting the needs of Gypsy, Traveller and Travelling Showpeople) is restricted to the context it provides for the specific allocation in the Plan: ST1/043 - Land East of 355 London Road). We address our objections to this site in a separate representation.

Please note Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please note: Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 or 5a above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan 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.

Adjustment of the Policy Text (page 75) to omit reference to “In addition to site allocations in this Plan”, in so far as that relates to the site allocation (at ST1/043 Land East of 355 London Road, Staines).

Our reasons for this are set out in the separate representation.

Please note: Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters, issues and questions he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please indicate with an 'X' as appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), 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 in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B

Name or Organisation: Colne Valley Park Trust

3. To which part of the Local Plan does this representation relate?

(Important: Please submit separate Part B forms for each)

Paragraph Policy/
Site ID/Ref **SP5 (Colne
Valley Regional
Park)** Policies
Map

Other (Please specify)

4a. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="text"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

(Please indicate with an 'X' as appropriate)

4b If you think the Local Plan is not sound, please indicate the reason(s) why:

Not Positively Prepared	<input type="text"/>
Not Justified	<input type="text"/>
Not Effective	<input checked="" type="text"/>
Not Consistent with National Policy	<input type="text"/>

See separate Representation Form Guidance Note further information on 'soundness'

(Please indicate with an 'X' as appropriate)

5. Please give details of why you consider the Local Plan is not legally compliant or is

unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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We welcome the policy SP5 to promote improvement of the Park's natural environment and access to it.

However, some small adjustments to the wording are needed to improve its effectiveness and avoid misinterpretation.

Please note Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

n/a

Please note: Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

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Adjustment of the Policy Text (SP5 Section 1 on page 50) as follows (new wording in red and deleted text in strikethrough):

1) The extent of the Colne Valley Regional Park (CVRP) within the Borough is defined on the Policies Map. As a member of the CVRP, the Council will seek to maintain the character and landscape of the Park and promote its **enhancement and** benefits.

Adjustment of the supporting text (para 5.23 on page 50) as follows:

The Colne Valley Regional Park was conceived in the 1960's with ~~the~~ broad aims including providing for informal recreation in a countryside setting.

This is because the CVRP has several objectives (as set out in our introductory and overview statement in our Part A proforma) and providing recreation opportunities is just one of them.

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Please indicate with an 'X' as appropriate

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Yes, I wish to participate in hearing session(s)

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Part B

Name or Organisation: Colne Valley Park Trust

3. To which part of the Local Plan does this representation relate?

(Important: Please submit separate Part B forms for each)

Paragraph Policy/ Site ID/Ref Policies Map

Other (Please specify)

4a. Do you consider the Local Plan is:

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the
Duty to co-operate

Yes

No

(Please indicate with an 'X' as appropriate)

4b If you think the Local Plan is not sound, please indicate the reason(s) why:

Not Positively Prepared

Not Justified

Not Effective

Not Consistent with National Policy

See separate Representation Form Guidance Note further information on 'soundness'

(Please indicate with an 'X' as appropriate)

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We object to the policy as we consider it:

- Too open to interpretation
- Could lead to widespread environmental harm and irreversible damage to the integrity of the Green Belt and CVRP
- Omits specific reference to the importance of protecting and enhancing the natural environment across the Colne Valley

The CVRP strongly objected to the previous proposal for Heathrow expansion involving a 3rd runway and large-scale associated 'airport supporting development', much of which fell within the Green Belt in the CVRP boundary.

At this stage it is not known what a future expansion proposal will look like, and its implications and impacts within Spelthorne Borough are unknown.

What is clear is that the Green Belt in Spelthorne is to be protected in line with national policy and that policy should not be repeated or adjusted in this policy. It is clear that, at this juncture the Council does not see that the case has been made out to accommodate major development in its Green Belt, as it is stated in para 3.6 of 'Topic Paper 1: Background to Strategy and case for Exceptional Circumstances to amend Green Belt boundaries' that: "We have reviewed the case for amending Green Belt boundaries for other purposes and consider that Exceptional Circumstances do not exist at this time."

Whether development proposals at the time meet the tests of Green Belt and other national policy will need to be assessed at the time.

We note that the statement made in para 5.35 "Despite the Supreme Court's ruling in 2020 that the proposed expansion can go ahead and would not be unlawful" is not entirely accurate. It only concerned the principle and a decision on whether a particular expansion "can go ahead" will be subject to due process.

(Continue on a separate sheet /expand box if necessary)

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The statement made in the Sustainability Appraisal, page 100 & 101, against SP6 – Heathrow Airport "Due to the uncertainties associated with any possible expansion of Heathrow Airport there are many unknowns for the policy. The policy has included measures mitigate negative impacts and this increases its sustainability credentials." confirms that there is a lot of conjecture and great care is therefore required in any policy in the Plan.

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We would prefer the policy to be deleted but suggest modifications to address the eventuality that a policy is retained.
See separate sheet at end of this representation for the detail.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please indicate with an 'X' as appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

1. We consider that an important planning issue is raised in our representation that requires round-table discussion amongst key interested parties, guided by the Inspector(s).
2. The CVRP is supported by several organisations and people and is not merely an individual. It merits being heard in the Examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Modification we consider necessary to make Policy SP7 sound (shown by strikethrough and new text in red)

SP7: Heathrow Airport

A possible expansion at Heathrow

1) The Council will support a future expansion at Heathrow Airport if it is undertaken in a sustainable and integrated way by:

- (a) working strategically with local authorities around Heathrow Airport.
- (b) permitting development proposals outside the airport or Development Consent Order (DCO) Limits boundary in the Borough for Airport Supporting Development (ASD) particularly those that support economic development if they:
 - fall outside of the Green Belt
 - seek to protect and enhance designated areas of existing environmental character including Sites of Nature Conservation Importance, areas of landscape value, the Borough's historic and cultural heritage (including historic buildings and Conservation Areas), habitats particularly within Biodiversity Opportunity Areas, **the Colne Valley Regional Park** and open space of amenity and recreation value;
 - demonstrate ecological offsetting and incorporate mitigation measures to achieve biodiversity net gain;
 - ensure safeguards are in place to mitigate air, noise, light and other pollution in the Borough; and
 - offer high-quality design of buildings and structures.
- (c) ~~assessing existing inappropriate development proposals~~ **assessing** ~~in the Green Belt in line with policy for the Green Belt set out in the National Planning Policy Framework and this Plan unless the harm is outweighed by very special circumstances.~~ **proposals in the Green Belt in line with policy for the Green Belt set out in the National Planning Policy Framework and this Plan**
- (d) supporting the implementation of a range of surface access interventions to encourage modal shift towards more sustainable forms of transport such as:
 - promoting sustainable transport choices which reduce the need to travel;
 - improving surface access to minimise airport related traffic (congestion) as the Borough as a whole;
 - promoting initiatives such as car sharing/clubs, the use of electric vehicles, low emission cars and colleague shuttle buses from the surrounding areas and;
- (e) supporting southern rail access including the promotion of the Southern Light Rail (SLR) where there is benefit to communities **and the environment** in the Borough and the wider strategic network.

Hazardous Development

2) The Council will refuse permission for any proposal likely to significantly increase the risks associated with any particular hazardous installation or impose conditions where necessary to avoid increased risk and;

3) Development leading to an increase in people living, working or congregating in the Public Safety Zone will be refused.

Noise from Heathrow

4) The Council will seek the support of BAA, the Government and relevant statutory authorities for the following measures:

- (a) maintenance of the use of noise preferential routes;
- (b) controls on flying at night that will achieve a progressive improvement in the night noise climate, including a limit on the total number of flights at night and;
- (c) maintenance of existing controls on ground noise.

Development close to Heathrow and Noise from Heathrow

5) The Council will seek to minimise the adverse impact of development close to Heathrow by:

- (a) refusing new residential development where aircraft noise levels are at or exceed 66Leq; except in the case of the one-for-one replacement of dwellings and;
- (b) requiring appropriate attenuation measures for development between 60 and 65Leq.

Part B

Name or Organisation: Colne Valley Park Trust

3. To which part of the Local Plan does this representation relate?

(Important: Please submit separate Part B forms for each)

Paragraph Policy/ Site ID/Ref Policies Map

Other (Please specify)

4a. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="text"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

(Please indicate with an 'X' as appropriate)

4b If you think the Local Plan is not sound, please indicate the reason(s) why:

Not Positively Prepared	<input type="text"/>
Not Justified	<input checked="" type="text"/>
Not Effective	<input checked="" type="text"/>
Not Consistent with National Policy	<input checked="" type="text"/>

See separate Representation Form Guidance Note further information on 'soundness'

(Please indicate with an 'X' as appropriate)

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If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We object to this allocation on London Road, Staines.

The site occupies a prominent location on the edge of the CVRP and Green Belt and its loss to development will reduce the feeling of openness.

The perimeters of the reservoirs in the southern part of the CVRP perform an important role providing a green context and foil to the nearby development and this applies here in relation to the large urban area of Staines.

Further urbanising this prominent frontage would have a significant adverse effect on the function of the Green Belt and wider value of the CVRP as a countryside resource. We include these images to illustrate our points.



The site makes a major contribution to openness and performs strongly against the fundamental aim of Green Belt policy “to prevent urban sprawl by keeping land permanently open”.

We are in no doubt that the site strongly performs against Green Belt purposes. The existence of development elsewhere in the vicinity provides no justification for this allocation – the edge of urban areas is where careful planning is most needed.

We also highlight that no compensatory improvements to the environmental quality/ accessibility of remaining GB land are allowed for in line with NPPF Para 142. This seems to be an absent feature from allocations being made in the Green Belt.

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5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

For the reasons we have summarised above, we do not agree with the assessment of this site - about the contribution it makes to Green Belt purposes and the comments made – as included on pages 66-69 in the Green Belt Assessment Stage 3 Report (July 2022). This erroneous assessment has also informed the Sustainability Appraisal commentary and conclusions as set out on pages 312-314, in particular the ‘neutral’ summary and “Moderately Performing / Less Important” conclusion.

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The site allocation should be deleted.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please indicate with an 'X' as appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part B

Name or Organisation: **Colne Valley Park Trust**

3. To which part of the Local Plan does this representation relate?

(Important: Please submit separate Part B forms for each)

Paragraph Policy/ Site ID/Ref **ST2** Policies Map

Other (Please specify)

4a. Do you consider the Local Plan is:

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the
Duty to co-operate

Yes

No

(Please indicate with an 'X' as appropriate)

4b If you think the Local Plan is not sound, please indicate the reason(s) why:

Not Positively Prepared

Not Justified

Not Effective

Not Consistent with National Policy

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(Please indicate with an 'X' as appropriate)

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If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Our objection to this Policy (Planning for the Borough) is restricted to the context it provides for the specific housing allocation in the Plan ST4/025 - Coppermill Rd in the Table at the top of Page 20.

We address our objections to this site in a separate representation.

Please note Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

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The table at the top of page 20 should be amended to reduce the specific allocations (presently 6073, with 829 in the Green Belt) by the 15 units (approx..) that the ST4/ 025 would contribute.

The respective figures should be 6058 and 814.

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2. The CVRP is supported by several organisations and people and is not merely an individual. It merits being heard in the Examination.

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Part B

Name or Organisation: **Colne Valley Park Trust**

3. To which part of the Local Plan does this representation relate?

(Important: Please submit separate Part B forms for each)

Paragraph Policy/
Site ID/Ref **ST4/023** Policies
Map

Other (Please specify)

4a. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound <i>(can be made sounder and more effective)</i>	Yes	<input checked="" type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

(Please indicate with an 'X' as appropriate)

4b If you think the Local Plan is not sound, please indicate the reason(s) why:

Not Positively Prepared	<input type="checkbox"/>
Not Justified	<input type="checkbox"/>
Not Effective	<input checked="" type="checkbox"/>
Not Consistent with National Policy	<input type="checkbox"/>

See separate Representation Form Guidance Note further information on 'soundness'

(Please indicate with an 'X' as appropriate)

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If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

No objection to the allocation, as such, at Two Rivers Retail Park Terrace, Mustard Mill Road, Staines, for approx. 750 residential units and GF commercial/community use.

However, because of the scale of the development, the proximity to the CVRP and the opportunity to enhance the natural environment associated with the two adjacent rivers (Wraysbury and Colne) and to provide better active travel connections we call for this to be accommodated, as far as possible, in scheme design and in contributions to off-site improvements.

Adjustments to the policy can provide for this.

Please note Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

Please note: Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 or 5a above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan 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.

In the allocation details on pages 206 and 207 insert:

The following text under 'Site Specific Requirements': "Sensitive design to take advantage of and enhance the setting of the two adjacent rivers (Wraysbury and Colne) and provide better active travel connections to the Colne Valley Regional Park, including through contributions to off-site improvements.

The following text under 'Opportunities': "The enhancement of the natural environment associated with the two adjacent rivers (Wraysbury and Colne) and access to the natural environment within the nearby Colne Valley Regional Park."

Please note: Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

You should provide all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters, issues and questions he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please indicate with an 'X' as appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), 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 in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B

Name or Organisation: Colne Valley Park Trust

3. To which part of the Local Plan does this representation relate?

(Important: Please submit separate Part B forms for each)

Paragraph Policy/ Site ID/Ref Policies Map

Other (Please specify)

4a. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="text"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

(Please indicate with an 'X' as appropriate)

4b If you think the Local Plan is not sound, please indicate the reason(s) why:

Not Positively Prepared	<input type="text"/>
Not Justified	<input checked="" type="text"/>
Not Effective	<input checked="" type="text"/>
Not Consistent with National Policy	<input checked="" type="text"/>

See separate Representation Form Guidance Note further information on 'soundness'

(Please indicate with an 'X' as appropriate)

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We object to this allocation at the junction of Coppermill Rd and Stanwell Rd, Wraysbury.

The site occupies a prominent location in the CVRP and Green Belt and its loss to development will greatly reduce the feeling of openness at a key public vantage point.

The perimeters of the reservoirs in the southern part of the CVRP perform an important role providing a green context and foil to the ribbon of housing along Coppermill Rd and other development along Stanwell Rd in Horton.

This parcel of land also complements the green frontage and natural environment provided by the nearby Poyle Poplars and the Arthur Jacob Nature Reserve to the north.

Urbanising this prominent corner would have a very significant adverse effect on the function of the Green Belt and value of the CVRP as a countryside resource. We include these images to illustrate our points.



The site makes a major contribution to openness and performs strongly against the fundamental aim of Green Belt policy “to prevent urban sprawl by keeping land permanently open”.



It can be seen from this Ordnance Survey Map extract that a section of the Colne Valley Way (a long-distance, broadly north-south route) passes this site.

The CVRP works hard to promote access to and enjoyment of the Green Belt and its natural environment across its area and this allocation will undermine that positive role. Each detrimental change also further erodes the ability of the Council to fulfil its duties as set out in NPPF Para 154 (we quote this in our introductory and overview statement within our Part A proforma).

We are in no doubt that the site strongly performs against Green Belt purposes. The existence of housing along Coppermill Rd provides no justification for this allocation – the edge of urban areas is where careful planning is most needed.

We also highlight that no compensatory improvements to the environmental quality/ accessibility of remaining GB land are allowed for in line with NPPF Para 142. This seems to be an absent feature from allocations being made in the Green Belt.

Please note Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

For the reasons we have summarised above, we do not agree with the assessment of this site - about the contribution it makes to Green Belt purposes and the comments made – as included on pages 70-73 in the Green Belt Assessment Stage 3 Report (July 2022). This erroneous assessment has also informed the Sustainability Appraisal commentary and conclusions as set out on pages 343/ 344, in particular the ‘neutral’ impact conclusion under “8. Open space and landscape”, the overall ‘neutral’ summary and “Moderately Performing / Less Important” conclusion.

Please note: Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 or 5a above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan 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.

The allocation should be deleted from the Plan as it is not justified and not in accordance with national policy.

Please note: Your representation should be as succinct as possible. If you use a separate sheet/s please clearly label the question number to which it refers.

You should provide all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters, issues and questions he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please indicate with an 'X' as appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

1. We consider that an important planning issue is raised in our representation that requires round-table discussion amongst key interested parties, guided by the Inspector(s).
2. The CVRP is supported by several organisations and people and is not merely an individual. It merits being heard in the Examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.