

Central and Eastern Berkshire - Joint Minerals & Waste Plan

Regulation 19 Proposed Submission Consultation

Statement from Horton Parish Council

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1. Introduction

1.1 This Statement is Horton Parish Council's response to the Regulation 19 Proposed Submission Consultation, running in September and October 2020, on the Central and East Berkshire Joint Minerals and Waste Plan. This Statement should be read in conjunction with the Parish Council's responses to previous consultations on this emerging Plan, including their response to the Focussed Regulation 18 Consultation in February 2020.

1.2 Horton is a rural Parish at the eastern extremity of the Royal Borough of Windsor and Maidenhead, adjoining the Boroughs of Slough and Spelthorne. The village of Horton was mentioned in the Domesday Book, and includes 13 statutorily Listed Buildings.

1.3 Horton Parish Council's Mission is to make the community of Horton a better place to live, work or visit. The Parish Council's aims and objectives include the following:

- To represent the interests of all residents
- To improve the quality of life of all residents
- To maintain and improve the local environment
- To review and comment on planning applications, new planning policies or statutory consultations

1.4 This Statement responds to a planning consultation and is prepared in the interests of all residents in order to fulfil the Council's aims and objectives of improving residents' quality of life, and improving the local environment.

1.5 The Parish Council accepts that there is a lengthy history of mineral extraction and waste management activity within its boundary, which over many years has transformed the character and environment of the Parish. It notes that these activities - which employ a number of local people - are set to continue for many more years, as 4 or the 7 Allocated Sites, listed in Appendix A of the Consultation Document, as within the Parish (WA1, WA2, MA1 and MA2).

1.6 The Parish Council fully understands the economic need for mineral extraction and for the well regulated management of waste. Its response to this Consultation therefore seeks to minimise the impact of these activities, over the future Plan period, on the environment and character of the Parish, particularly in respect of:

- Noise, smell and air pollution
- Increased road traffic
- Environmental damage

affecting the quality of life of all local residents, the fabric and amenity of the historic Horton Village, enjoyment of the countryside, and the setting of the Parish's Listed Buildings.

1.7 The possibility of achieving the Parish Council's objectives of improving quality of life and the local environment becomes more difficult in the future as is recognised in paragraph 3.13 of the Consultation Document, which says:

“The area’s importance is highlighted by its relatively close proximity to several major infrastructure projects including the M4 Junctions 3 to 12 Smart Motorway and Southampton to London Pipeline Nationally Significant Infrastructure Projects; the High Speed 2 rail link from London to the North; the proposed Heathrow airport expansion and Crossrail. These projects significantly increase the regional and national demand for construction aggregates, as well as for construction waste treatment and recycling.”

1.8 The references to the expansion of Heathrow in the consultation document are confusing to the Parish Council, who are well aware that RBWM have continually voiced their implacable opposition to further development at Heathrow.

1.9 Given the very close proximity of Horton Parish to Heathrow, the Parish Council strongly considers that the emerging Plan must reflect the views of RBWM on the matter of Heathrow expansion and include positive policies to mitigate the impact of any increased national or other demand, in the context of Heathrow, on the residents and environment of Horton. The Parish Council request that RBWM make a clear statement in this regard before the Plan is submitted for Examination.

2. The Four Allocated Sites

2.1 WA1: Berkyn Manor Farm

2.1.1 The proposal is to use this area of 2.7 hectares for green waste and / or energy recovery, with the construction of small-scale industrial premises.

2.1.2 The Parish Council strongly objects to mineral extraction and infill on this site as it would inevitably cause a severe and negative impact on the immediate vicinity of the neighbouring housing,, and further permissions farmland and the listed historic buildings, and has the following comments:

- Access to the site is currently via a narrow and poorly made track which is unsuitable for increased use.
- This site is already the subject of an as yet unresolved enforcement enquiry due to a new mineral and waste processing operation, and further permissions or site allocations here should not be considered until the current position is regularised and resolved; the present seemingly unauthorised activities are causing great concern to both the Parish Council and to the Colne Valley Regional Park.
- Any proposed access to the site from Stanwell Road must be coupled with a legally binding agreement and vehicle routing plan which forbids traffic from entering or leaving via the historic Horton Village.
- Hours of operation of the site should be limited to ensure minimum disturbance to local residents by reason of noise and activity. The Parish Council suggests maximum working hours of 8am to 6pm Monday to Friday, no working at weekends or Bank Holidays.
- Alongside the clearly stated working hours, a legal agreement must be entered into with the site operator to prevent vehicles waiting and stacking outside the site, outside the permitted hours of operation, as this causes potential traffic hazards and disturbance to residents.

- The Development Considerations indicate that “the setting of Grade II Listed Building to the south needs to be considered.” There are in fact grade II listed buildings at both Berkyn Manor Farm and [REDACTED]. The Parish Council would therefore ask that this section be strengthened and reworded to state: “The setting of the Grade II Listed Buildings at Berkyn Manor Farm and [REDACTED] must be protected”.
- The Parish Council is concerned about the use of this site, close to the village and to many dwellings, for the processing of green waste. This can not only cause significant disturbance to residents because of the odours produced, but also produces bacteria and living organisms which can be harmful to residents’ health.
- Additionally, there is concern regarding the potential for pollution of local watercourses and pollution of private land or gardens.
- It is likely that existing water levels in the area would be affected by any further operations, and plans to effectively mitigate this must be incorporated into any future planning for the site.
- Any new buildings must be small scale and, recognising the rural location, have the appearance of farm buildings rather than factory premises.

2.2 WA2: Horton Brook Quarry

2.2.1 The proposal is to use this area of 55 hectares for inert recycling in addition to existing quarrying operations.

2.2.2 The Parish Council supports the rigorous Development Considerations listed in the Consultation Document together with the requirements for site restoration. It would wish to ensure that HGVs entering or leaving the site are required, by a legally binding Routeing Agreement, not under any circumstances to proceed via the historic Horton Village.

2.3 MA1: Horton Brook and Poyle Quarry Extension

2.3.1 The proposal is to extend the existing quarry over an area of 3.75 hectares, extracting 250,000 tonnes of sand and gravel.

2.3.2 The Parish Council remains concerned regarding air and noise pollution to local residents, and wishes to ensure that HGVs entering and leaving the site are under no circumstances routed through historic Horton Village.

2.3.3 The Parish Council would also wish to be involved closely in discussions concerning the restoration of the bridleway route and its role in improving local connectivity and public access.

2.3.4 There also remains a long outstanding Section 106 commitment to build a footbridge over the existing watercourse, and this should be resolved in advance of approval to any further extension of the quarry.

2.4 MA2: Poyle Quarry Extensions

2.4.1 The proposal is to extend Poyle Quarry in two areas totalling 6 hectares for the extraction of 250,000 tonnes of sand and gravel. The Parish Council notes that part of the area is contiguous with site WA1: Berkyn Manor Farm, and therefore has similar comments to make on this allocation:

- Access to the site is currently via a narrow and poorly made track which is unsuitable for increased use.
- Any proposed access to the site must be coupled with a legally binding agreement and vehicle routing plan which forbids traffic from entering or leaving via the historic Horton Village.
- Hours of operation of the site should be limited to ensure minimum disturbance to local residents by reason of noise and activity. The Parish Council suggests maximum working hours of 8am to 6pm Monday to Friday, no working at weekends or Bank Holidays.
- Alongside the clearly stated working hours, a legal agreement must be entered into with the site operator to prevent vehicles waiting and stacking outside the site, outside the permitted hours of operation, as this causes potential traffic hazards and disturbance to residents.
- The Development Considerations indicate that “the setting of Grade II Listed Building to the south needs to be considered.” There are in fact grade II listed buildings at both Berkyn Manor Farm and [REDACTED]. The Parish Council would therefore ask that this section be strengthened and reworded to state: “The setting of the Grade II Listed Buildings at Berkyn Manor Farm and [REDACTED] must be protected”.
- It is likely that existing water levels in the area would be affected by any further operations, and plans to effectively mitigate this must be incorporated into any future planning for the site

3. Implementation

3.1 The impact of uncontrolled mineral extraction and waste management activities upon communities can be devastating, with issues relating to pollution, traffic, rights of way etc quickly getting out of hand. It is in the interests of all stakeholders, including the local community, for there to be, as an integral part of the planning and implementation process, means whereby the community has an unquestioned right to comment upon and review those activities.

3.2 Horton Parish Council was therefore pleased to read the following comments at page 25, paragraph 5.4 of the Consultation Document:

“Development management will be the main, but not the only, means by which the Plan will deliver sustainable minerals and waste development in Central and Eastern Berkshire. The Plan is largely delivered through the determination of minerals and waste planning applications and through the implementation of policies in this Plan. The approach will be focused on problem solving and seeking quality outcomes. Accordingly, when dealing with applications, the relevant planning authority will...

encourage community engagement on minerals and waste development proposals, as appropriate, to ensure the community can examine development proposals and engage with interested parties. Community engagement is relevant to minerals and

waste development at all stages of the planning process, including pre-application and post submission, as well as during development monitoring.”

3.3 The Parish Council, on behalf of its residents, will positively welcome the proposed community engagement, as indicated, on all four of the Allocated Sites, at all stages, including development monitoring. As the local democratically elected body of community representatives, it will wish to be involved, and indeed at the centre of, such engagement at all stages, and would wish the setting up of proper community involvement to be enshrined both in the Plan, and in watertight legal agreements with the various site owners and developers.

4. Enforcement

4.1 The Consultation Document is sadly silent on matters relating to Enforcement. The operation of the Allocated Sites must be subject to planning permissions, which will include enforceable and legitimate planning conditions, and legal agreements, which will include clauses with the specific intention of reducing the impact of the activities upon the local community.

4.2 These documents will not be worth the paper that they are written on unless there is a clear desire on the part of the relevant authorities, including the minerals / Waste Planning Authority, to inspect and monitor active sites for compliance, and to unhesitatingly seek reparation for any breach of control.

4.3 The Parish Council would wish to see a Minerals / Waste Enforcement Plan attached as an Appendix to this Plan, setting out a regime (on the part of the Planning Authority) for inspection and monitoring of the sites, and including a commitment on the part of the Planning Authority to report back in response to complaints or queries within a reasonable timescale. The Enforcement Plan should clearly identify which Authority should be contacted in respect of specific problems (e.g. noise, smell, pollution, breach of planning condition) including 24/7 contact telephone numbers and email addresses.

Conclusion

Horton Parish Council asks that its comments are taken into account and will influence future stages of this Plan, and wishes to be involved at all further stages of the development of this Plan, including representation at its Examination, as necessary.

