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Royal Borough of Windsor and Maidenhead

Consultation on Proposed Changes to the Borough Local Plan – December 2019

Response of the Colne Valley Regional Park Community Interest Company

Introduction and the Colne Valley Regional Park

1. 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 and Chalfont St. Peter in the west.
2. The Park is championed by the Colne Valley Park Community Interest Company (CVPCIC), which is submitting these comments.
3. The CIC's locus is to protect and enhance the Regional Park through 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.
4. A significant and fragile section of the southern part of the Park is located in the Royal Borough covering the parishes of Horton, Wraysbury and part of Datchet. It is a part of the Regional Park that is in particular need of comprehensive planning and improvement.
5. Our comments focus on the changes being proposed to the draft Plan and in so doing we highlight where we do not consider that the changes go far enough to address relevant issues.

Key Points as Overview

The CVPCIC welcomes the initiative to prepare a Green and Blue Infrastructure Study in 2019 and, related to that, the desire to provide a stronger place-making planning framework. However, we consider that more changes should have been proposed to respond to the significant challenges to the Borough's green and blue environment – which we perceive as greatest in the east of the Borough within the Colne Valley Regional Park.

Except in one instance (policy HO1, site AL40) we are not stating that the Plan's changes are unsound but that it should go further to provide a more robust and positive planning framework for decision making.

The representations we make below are in that light.

Representations by Section/ Policy

3.7 Key spatial issues

Arising from the additional work undertaken on Green and Blue Infrastructure and recent progress on Heathrow expansion proposals, including statutory consultation prior to submission of a DCO following the 2018 Airports National Policy Statement, we consider that an additional strategic issue/ challenge for the Plan should be identified relating to “How can the pressures arising from proposed Heathrow expansion (into the Green Belt and Colne Valley Regional Park) be positively responded to by improving the accessibility and environment of remaining areas of Green Belt and the quality of life for communities within the Borough?”

4.2 Spatial Vision

We consider that the last sentence of the vision should be amended as follows in track changes (to respond to the challenges and vision identified in the 2019 Green and Blue Infrastructure Study)

“The Green Belt will be protected to ensure that the setting of our towns and villages remain protected from inappropriate development. Access to the countryside [and its environmental improvement](#) will be promoted to take advantage of the benefits offered by the rural setting of the Borough.”

SP1 Spatial Vision

The paragraph 9 under 'Villages and the Green Belt' should be amended to read (changes shown as tracked changes):

"The Green Belt will be protected from inappropriate development and enhanced in line with Government policy."

QP2 Green and Blue Infrastructure

- a) We welcome this policy and look forward to collaboration on the preparation of the Supplementary Planning Document.
- b) A policy should be added to specifically relating to the Colne Valley Regional Park (and showing its boundary on the Proposals Map) in line with the recommendation for such a policy in the recently agreed Colne and Crane Green Infrastructure Strategy (2019). This 'model policy' is appended as Annex A to this set of representations.

QP4 River Thames Corridor

We support this policy but, as stated above in relation to QP2, we ask that a policy relating to the Colne Valley Regional Park is added.

HO1 Housing (and related site allocation proforma in Appendix C)

AL40 Land east of Queen Mother Reservoir, Horton (100 units)

Policy is unsound – reasoning:

This site is within the Green Belt and Colne Valley Regional Park. If this site is to be released it is critical that its allocation specifies in policy how its development should address the challenge set out in para. 138 of the 2019 NPPF – that "Where it has been concluded that it is necessary to release Green Belt land for development They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land." Specifically the proforma in Appendix C should include reference to facilitating the provision of an active travel through the site (within an attractive green corridor) and connections beyond the site, along Thames Water land between the B470 and the Horton Road, to enhance accessibility to and enjoyment of the countryside in this area, including in the CVRP.

NR2: Nature Conservation and Biodiversity

We support the policy and ask that within the supporting text (at least) the importance of the Colne Valley Regional Park should be referred to.

NR3 Trees, woodlands and hedgerows: We support the policy.

Infrastructure

We support the policies, as amended, relating to Infrastructure but ask that the importance and objectives of the Colne Valley Regional Park is referred to in supporting text.

Green and Blue Infrastructure Study (October 2019)

We support this study and offer these comments:

The next steps relating to Green and Blue Infrastructure must be undertaken with clear reference to the Colne & Crane Green Infrastructure Strategy. The forthcoming SPD must refer to the Colne Valley Regional Park and be informed by the Colne & Crane GI Strategy including:

- The vision and key principles
- The schedule of opportunities
- The priorities (Appendix 1)
- The outline of planning policy recommendations in appendix 2 for the Colne Valley Regional Park and for development close to watercourses/water bodies.

EXTRACT FROM 2019 COLNE AND CRANE GREEN INFRASTRUCTURE STRATEGY

Colne Valley Regional Park

When Local Plans are being prepared or updated that affect land within the Colne Valley Regional Park a policy should be included that specifically recognises the Park's designation and the need to protect and enhance its natural environment, as in the box below:

Model Development Plan Policy relating to the Colne Valley Regional Park

“Proposals within the Colne Valley Regional Park should make a positive contribution towards improvement of the Park in line with its 6 objectives¹.

Development within the Park is expected to demonstrate it will:

- Maintain and enhance the landscape, historic environment and waterscape of the park in terms of their scenic and conservation value and their overall amenity;
- Conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features;
- Provide opportunities for countryside recreation and ensure that facilities are accessible to all, promoting active travel networks;
- Seek to achieve a vibrant and sustainable rural economy within the Park; and
- Encourage community participation including volunteering and environmental education, and promote health and social well-being through accessible, high quality green space.
- Include legally binding provision for the long term management and maintenance of green infrastructure provided or improved as part of the development and its mitigation.

Development that fails to demonstrate the above will be refused unless the context of the proposed development means that the above factors are not relevant.”