**South Bucks & Chiltern Local Plan**

**Comments from the Colne Valley Park Community Interest Company**

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**General comments/Summary**

The Colne Valley Park CIC does not believe the plan does enough for the Council’s and Park’s drive for comprehensive environmental improvement. **The plan is not ‘sound’** for the following reasons:

1) In our view, the policies are clearly at odds with section 3.1.2 where the councils state they will “conserve the environment whilst also promoting sustainable economic growth”. The policies are unbalanced, being more weighted towards the latter, and it is doubtful whether they will result in “sustainable” growth. The policies are enabling development; very few (eg Burnham Beeches) present any circumstances where the protection/promotion of Green Infrastructure should be prioritised.

2) Policies within the plan apparently ignore sections of the National Planning Policy Framework (NPPF):

* Para 138 “….. Where it has been concluded that it is necessary to release Green Belt land for development, plans should …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”.
* Para 141: “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

We do not believe the local plan has any policies that achieve comprehensive environmental improvement to ‘environmental quality and accessibility’ listed in para 138. Nor do we believe the local plan “plans positively” for the “beneficial uses” listed in para 141

We welcome the inclusion of a Colne Valley Regional Park policy, but the points outlined in comments 1 and 2 above must be addressed for this policy to realise its considerable potential to create comprehensive environmental improvement for the benefit residents of South Bucks and Chiltern districts. As things stand, we remain unconvinced it will achieve this.

**Comments on specific sections and suggested modifications**

3.1.2 Bullet points 1 and 2under section 1 “conserve the environment” have the caveat: “…whilst balancing the need for housing”, yet the corresponding bullet point 2 under section 2 “promote sustainable economic growth” is missing the corresponding caveat: “….whilst balancing the need to conserve the green belt and safeguard our heritage for future generations”

**4.5 Climate Responsive Development**

4.5.5 Bullet point 8, remove “small-scale”.

Policy DM DP5 . Make clear within the wording of the policy that this refers to development/allocated sites rather than individual developments – so the plan does not inadvertently encourage several smaller developments that are all under the threshold.

**4.9 Reducing reliance on private car**

Policy DM DP9. Be more specific about additional cycle/walking connectivity off-site that larger developments must contribute towards creation and enhancement of cycle/walking travel routes connecting the development to railway stations, town/village centres and countryside attractions/destinations.”

**4.15 Blue and Green Infrastructure**

4.15.7. Remove “Where appropriate” from lines 3&4

Policy DM DP15: to help/guide the local authority to “plan positively” in line with para 141 of the NPPF add new sentence: “Blue and green infrastructure strategies for sites within the Chilterns AONB and Colne Valley Regional Park must be informed by the objectives and strategies of the AONB and Regional Park”

**7.2 Pedestrian routes and cycleways**

Policy DM CP2. Add additional wording to make clear the travel plan must include measures for cycle/walking connectivity off-site that links the development with railway stations, town/village centres and countryside attractions/destinations

* 1. **Colne Valley Regional Park**

Policy DM NP2. We are disturbed to note this policy apparently encourages development even though most of the Colne Valley Regional Park is green belt. The policy does not give the Councils the ability to achieve the opportunities described within NPPF paras:

* 138 in that it fails to set out how “compensatory improvements to the environmental quality and accessibility of remaining Green Belt land” can be implemented
* 141 in that it fails to “plan positively to enhance their (green belts) 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”.

The policy should be reworded so that it gives the ability to achieve NPPF paras 138 and 141. It should also:

* Refer to the Colne Valley Regional Park boundary on the policy map
* List the six objectives of the Colne Valley Regional Park (see <https://www.colnevalleypark.org.uk/whats-special/> )
* Include a ‘planning conditions and obligations’ section similar to policy DM NP9; this section must refer to the Colne and Crane Green Infrastructure Strategy
* Include a list of circumstances where planning permission will be refused
* Refer to the other local authorities that also include parts of the Colne Valley Regional Park (Three Rivers, Hillingdon, Slough, Spelthorne and Windsor& Maidenhead) in line with the duty to co-operate

**9.5 Trees and Woodlands**

Needs an additional paragraph describing what ancient woodland is using/referring to an accepted definition.

Policy DM NP5. Add “Planning permission will be refused where it results in the loss of ancient woodland” and “Any development immediately adjacent to ancient woodland must provide a developer contribution towards woodland enhancement, management and maintenance and must leave a buffer between buildings and gardens and the ancient woodland” – this is to reduce the tipping of garden waste which can spread invasive species into ancient woodland.

This is to ensure compliance with NPPF para 175 which states “development resulting in the loss *or deterioration\** of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused”

\*our emphasis

**9.6 River Character and Water Environment**

Include angling as one of the activities listed. It is important that specific reference is made to this, because anglers’ licence and ticket fees contribute to the management of river corridors, gravel pits and ponds.

9.6.1 Add “Colne Brook” to the list of main rivers

9.6.5 Add inclusion of water recreation in Colne Valley (currently only Dorney lake is mentioned) – this is particularly relevant for Denham Waterski Club and new HOAC facilities.

9.6.6 We feel the plan should be more specific with regard to the types of improvement required. It relies on a developer having a detailed understanding of the Water Framework Directive (WFD), yet it is likely a developer will not know what improvements to propose, and will end up going for general wildlife enhancements. To help to ‘plan positively’ in line with para 141 of the NPPF the plan should make reference to some specific types of activity e.g.

* Measures to improve habitat connectivity e.g. fish passage improvement works / deculverting;
* Measures to improve in-channel habitat complexity e.g. in channel rehabilitation or restoration works, backwater creation, removal of hard revetment;
* Measures to improve riparian habitat complexity e.g. tree thinning/planting, introduction of appropriate native plant species, bank re profiling, removal of hard revetment;
* Measures to future-proof rivers against climate change e.g. the provision of low-flow channels, improvements of flow management;
* Measures to improve water quality e.g. end-of-pipe improvements for outfalls, suds.
* Measures to control invasive species e.g. survey and remove all invasive species on site, invasive species management plans.

9.6.9 - The Colne Catchment Plan should be referred to in the same context as that for the Jubilee River. Information on the Colne Catchment Action Network and the Catchment action plan at [www.colnecan.org.uk](http://www.colnecan.org.uk)

Policy DM NP6. Bullet point 3 is not strong enough. It must refer to specific creation of a buffer and enhancement, management and maintenance in this zone, rather than the current passive wording “does not adversely effect”.

Bullet point 4, change to “Retains *and enhances* the special character….”

Change final point to “Opportunities for De-culverting, *in-channel and bankside habitat, flow and fish passage enhancements* should be taken…..”.

**9.9 Light Pollution**

Add a paragraph about the impact on biodiversity, e.g. to bats (this is covered in the policy, but not the description)

Policy DM NP9. “Significantly adverse impact” is too high a hurdle to assess the impact on biodiversity against. “Restrict or Control Development” should be amended to “Refuse development”

**BP SP1** This policy must include specific reference to Green Infrastructure. This is to ensure compliance with NPPF para 138: “ Where it has been concluded that it is necessary to release Green Belt land for development, plans 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”.

**BP7 Chalfont St Peter North East**

This site is partially located within the Colne Valley Regional Park. Clear reference to this should b made in the preamble, the policy itself, and in the site-specific requirements.

This policy releases land in the green belt yet has inadequate off-site green belt improvements associated with it. This is not ‘sound’ as it is in conflict with NPPF para 138: “ Where it has been concluded that it is necessary to release Green Belt land for development, plans 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”.  Ways that this site can contribute towards environmental quality and accessibility of remaining green belt land in the Colne Valley Regional Park adjacent to the site include:

* Enhancement of Horn Hill circular walk (which runs adjacent to the site boundary);
* Enhancements of major countryside attractions a short cycle ride or drive away, such as Chiltern Open Air Museum, Rickmansworth Aquadrome, Denham Country Park and the Colne Valley Park Visitor Centre;
* Improvements to the rights of way network within the CVRP;
* Improvement, management and maintenance of ancient woodland near the site;

**BP8 Chalfont St Peter South East**

The border of the proposed development will be just 10m from the PACCAR Scout Camp. A new housing estate butting up to one of the largest and most used scout camps in the country is unsustainable.

This site is wholly located within the Colne Valley Regional Park. Clear reference should be made to this in the preamble, the policy itself, and in the site-specific requirements.

This policy releases land in the green belt yet has inadequate off-site green belt improvements associated with it. This is not ‘sound’ as it is in conflict with NPPF para 138: “ Where it has been concluded that it is necessary to release Green Belt land for development, plans 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”.  Ways that this site can contribute towards environmental quality and accessibility of remaining green belt land in the Colne Valley Regional Park adjacent to the site include:

* Enhancement of Chalfont Park circular walk (which runs adjacent to the site boundary);
* Enhancements of major countryside attractions a short cycle ride or drive away such as Chiltern Open Air Museum, Rickmansworth Aquadrome, Denham Country Park and the Colne Valley Park Visitor Centre;
* Improvement of the rights of way network within the CVRP;
* Improvement, management and maintenance of ancient woodland near the site;

**BP10 Iver Heath**

This site is wholly located within the Colne Valley Regional Park. Clear reference should be made to this in the preamble, the policy itself, and in the site-specific requirements.

This policy releases land in the green belt yet has inadequate off-site green belt improvements associated with it. This is not ‘sound’ as it is in conflict with NPPF para 138: “ Where it has been concluded that it is necessary to release Green Belt land for development, plans 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”. Ways that this site can contribute towards environmental quality and accessibility of remaining green belt land in the Colne Valley Regional Park adjacent to the site include:

* Enhancement of paths, landscaping and biodiversity of Hardings Row Nature Reserve including extension of the reserve up to the Slough Road including provision of a new path towards a new safe crossing of the A4007 to directly link Hardings Row Nature Reserve to the Iver Heath development site;
* Enhancement of major countryside attractions a short cycle ride or drive away such as Black Park, Langley Park, Denham Country Park and the Colne Valley Park Visitor Centre;
* Enhancement of major countryside attractions a short drive away, such as Denham, Black and Langley country parks and the Colne Valley Park Visitor Centre;
* Improvement of the rights of way network within the CVRP
* Environmental improvements in line with the objectives of the CVRP

The following on-site opportunities should be included in the list of site-specific requirements in the planning application:

* A new footpath link to be provided through the site connecting the existing footpath IV4 to the permissive path south of Pinewood Studios, linking with Black Park.
* improvement of the watercourses (within, and up- and downstream of the site) and the buffer zone in line with the objectives of the Colne Valley Park and the Colne Catchment Action Network (ColneCAN).
* Inclusion of sustainable urban drainage systems to prevent any unsatisfactory run-off reaching the Colne Brook via the feeder watercourse running through the site
* Woodland areas and the grassland/scrub areas of highest wildlife value to be retained with resources allocated for their enhancement and future management and maintenance.
* The proposed open space of 'Gams Field' must be incorporated into the local plan because it can provide an important link between Iver Heath fields and Hardings Row Community Nature Reserve as part of a network of accessible green space within Iver Heath.

**BP11 North of Iver Station**

This site is wholly located within the Colne Valley Regional Park. Clear reference should be made to this in the pre-amble, the policy itself, and in the site-specific requirements.

This policy releases land in the green belt yet has inadequate off-site green belt improvements associated with it. This is not ‘sound’ as it is in conflict with NPPF para 138: “ Where it has been concluded that it is necessary to release Green Belt land for development, plans 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”.  Ways that this site can contribute towards environmental quality and accessibility of remaining green belt land in the Colne Valley Regional Park adjacent to the site include:

• Enhancement of paths, landscaping and biodiversity and existing sites within walking distance (e.g. Thorney Park and the Slough Arm of the Grand Union Canal);

* Enhancements of major countryside attractions a short cycle ride or drive away, such as Little Britain Lake, Denham Country Park and the Colne Valley Park Visitor Centre;
* A contribution toward the costs of replacing the bridge and footpath link over the Slough Arm at IV16 immediately to the west of the site.
* The upgrade, improvement and promotion of the Iver circular walk which runs nearby.
* Improvement of the rights of way network within the CVRP, including a new path from the canal bridge at the north west of the site to the western edge of Iver Village or Shredding Green
* Environmental improvements in line with the objectives of the CVRP

The following on-site opportunities should be included in the list of site-specific requirements in the planning application:

* A new footpath link to be provided through the site connecting existing footpaths IV15 and IV17 to Iver station via an off-road route. There should be a countryside/green corridor setting to this path;
* Woodland and the grassland/scrub areas of highest wildlife value to be retained with resources allocated for their enhancement and future management and maintenance. This should include significant areas on the northern and western edge of the site to retain the countryside setting for users of the Slough Arm and Thorney Lane.

**BP12 East of Ridgeway Business Park**

This site is wholly located within the Colne Valley Regional Park. Clear reference should be made to this in the preamble, the policy itself, and in the site-specific requirements.

This policy releases land in the green belt yet has inadequate off-site green belt improvements associated with it. This is not ‘sound’ as it is in conflict with NPPF para 138: “ Where it has been concluded that it is necessary to release Green Belt land for development, plans 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”.  Ways that this site can contribute towards environmental quality and accessibility of remaining green belt land in the Colne Valley Regional Park adjacent to the site include:

* Enhancement of paths, landscaping and biodiversity and existing sites within walking distance (e.g. Thorney Park and the Slough Arm of the Grand Union Canal);
* Enhancement of major countryside attractions a short cycle ride or drive away, such as Denham Country Park, Little Britain Lake and the Colne Valley Park Visitor Centre;
* A contribution toward the costs of replacing the bridge and footpath link over the Slough Arm at IV16 immediately to the west of the site;
* The upgrade, improvement and promotion of the Iver circular walk which runs nearby;
* Improvement of the rights of way network within the CVRP
  + Environmental improvements in line with the objectives of the CVRP

**BO13 North of Denham Roundabout**

This policy is not ‘sound’ as the site is important for providing a green entry to the green areas beyond including Denham Country Park and **should not be removed from the Green Belt.** If this field is developed it will completely blight the gateway to Denham Country Park and the current green approach to the Colne Valley Park Visitor Centre, as well as heightening the risk of urbanisation given its close proximity to New Denham, Uxbridge and A40. ‘Exceptional Circumstances’ are not met in line with paragraphs 136 and 137 of the National Planning Policy Framework. NPPF para138: this site is not “well served by public transport”. Locating development of this nature here is in direct conflict with policy DMDP9 which seeks to reduce reliance on the car.

If the site is taken forward in the local plan, the following points must be incorporated into the policy.

This site is wholly located within the Colne Valley Regional Park. Clear reference must be made to this in the preamble, the policy itself, and in the site-specific requirements.

This policy releases land in the green belt yet has inadequate off-site green belt improvements associated with it. This is not ‘sound’ as it is in conflict with NPPF para 138: “ Where it has been concluded that it is necessary to release Green Belt land for development, plans 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”.  Ways that this site can contribute towards environmental quality and accessibility of remaining green belt land in the Colne Valley Regional Park adjacent to the site include:

* Enhancement of paths, landscaping and biodiversity within Denham Country Park and paths around the lakes at the Lea quarry;
* Information, interpretation, visitor facilities and public events at the Colne Valley Park Visitor Centre;
* The upgrade, improvement and promotion of the Denham circular walk which runs nearby;
* Improvement of the rights of way network within the CVRP, including a new cycle/walking route between the development, through the Lea Quarry, over a new Colne bridge to connect with the Canal towpath. As well as connecting hotel guests and existing local residents to the network of footpaths and bridleways, this will also create an attractive off-road route to Uxbridge.
  + Environmental improvements in line with the objectives of the CVRP

The following on-site opportunities should be included in the list of site-specific requirements in the planning application should the site be released from the green belt:

* A 30m landscaped swathe of green belt should be retained adjacent to Denham Court Drive. This is critical to retaining openness of the green belt, and must form a fundamental part of any site policy.
* Footpath links to be provided through the site from adjacent residential areas and Denham roundabout to Denham Country Park, and the network of public rights of way within the Colne Valley Regional Park.
* Existing food/drink outlets in Denham Court Drive at the Colne Valley Park Visitor Centre and Buckinghamshire Golf Club should be highlighted with appropriate, clearly visible signs from the development site and from Denham roundabout*.*

**Examination in public**

The Colne Valley Park CIC would wish to appear at the examination in public to ensure the requested modifications are considered by the inspector.