



Spelthorne Local Plan Preferred Options Consultation
Response from the Colne Valley Regional Park Community Interest Company
January 2020

Context and Introduction

1. The Colne Valley Regional Park covers 43 square miles. It is the first taste of countryside to the west of London. The Regional Park aims to ensure multi-functional use of land in line with the six objectives of the Park, namely:
 - i. 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.
 - ii. To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
 - iii. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
 - iv. To provide opportunities for countryside recreation and ensure that facilities are accessible to all
 - v. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside
 - vi. 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.
2. There is a strong geographical crossover between Spelthorne Borough and the Colne Valley Regional Park: 21% of Spelthorne Borough lies within the Colne Valley Regional Park (CVRP). The CVRP is a significant asset for Spelthorne and should be included in the 'Spelthorne facts' and 'Open spaces and leisure' sections of the Local Plan.
3. A Community Interest Company (CIC) oversees the CVRP. The CVRP CIC collaborates with Spelthorne BC to identify and, where resources allow, implement ways to enhance the environment and accessibility (by non motorised modes) of the Park. Initiatives are geared to ensure that the Park offers an improved wildlife, recreational and educational resource for communities in Spelthorne and beyond, in line with the 6 objectives outlined above. This is a resource for the long-term, the land in the Park is invariably Green Belt that needs to be cherished for its natural environment as once lost to development it is lost forever.
4. There are some parts of the CVRP within the Borough (e.g. Staines Moor) that are well recognised for the quality of the environment whilst others (e.g. on the perimeter of Stanwell Moor and the existing Bretts minerals extraction site – a temporary use with restoration) may not presently reveal the same qualities. However those less immediately 'attractive' parts of the Park offer critical environmental and recreational potential as part of a wider network of green and blue corridors within the Colne Valley. There are many opportunities presented by such areas for improved green and active travel connectivity.
5. Our comments are provided within this context.



Comment on Site Assessments, Allocations and Rejected Sites

6. The CVRP CIC welcomes the fact that no sites within the CVRP are allocated for development and that those assessed have been rejected.
7. However, the CVRP CIC calls for a review of the wording in the assessments https://www.spelthorne.gov.uk/media/21631/Rejected-Site-Allocations-Officer-Site-Assessments/pdf/Rejected_Officer_assessments_document1.pdf?m=637081301680370000 that relate to their rejection. This applies to all sites within the CVRP but, in particular, we highlight sites:
 - SN1/009 (Poyle Meadows)
 - SN2/005 (Hithermoor Farm etc, Stanwell Moor)
 - SN2/004 (Land at Hithermoor and Horton Rd, Stanwell Moor)
 - ST1/014 (Thames Water training centre, Wraysbury)
 - ST1/013 (Land at Vicarage Road etc Staines)
8. The rationale for calling for this re-assessment is eluded to in paras 3 and 4 above and includes:
 - The assessments should reference the CVRP and that the sites fall within a narrow, fragile but important section of the Park
 - The sites are valuable as part of the natural environment in that section of the Park and need to be retained and enhanced as part of the improvement to its character, as a linear green and blue corridor.
 - The assessments (and the Arup GB assessment they are informed by) take too blanket an approach, failing to consider both the potential of the land as part of that corridor as well as their existing contribution.
 - Large parts of the sites (if not their entirety in some cases) are critical to the long term enjoyment by the community of the CVRP and Green Belt.
 - The assessments need to take a finer grained approach to the sites, developing the above considerations.

Proposed Planning Policies

9. The CVRP CIC welcomes the direction of travel for the Plan and is grateful that our submissions at earlier stages of the Plan have been given consideration.
10. However, we consider that further refinement will improve the effectiveness and soundness of policies, and draw attention to:
 - a) Policy SP1 (Staines-upon-Thames): Section 6 refers to Southern Rail Access. The CVRP is concerned about the potential environmental impact of a Rail Access Scheme on the area of the CVRP around Staines Moor. Whilst we object to impacts of a rail scheme that are contrary to the Park's 6 objectives we believe that, if a scheme goes ahead, there are ways to minimise its environmental impact and this part of the policy should be qualified to refer to this.
 - b) Policy SP3 (Stanwell & Stanwell Moor): We welcome part '4' in the policy but ask that it be broadened to embrace the green corridors and make reference to the CVRP as a resource for the local communities (and beyond).
 - c) Policy SP5 (CVRP): Welcomed. This wording is broadly in line with the model policy in Appendix 2 of 2019 Colne & Crane GI Strategy but we ask for the addition of a final



paragraph about the circumstances when development will be refused (as included in Appendix 2). The 'reasoned justification' should also be enhanced, drawing on the evidence and strategy material in the 2019 Colne & Crane GI Strategy. The objectives listed on pages 20/ 21 need to be corrected, as there are 6 objectives.

- Policy SP6 (Thames & Tributaries): In principle welcomed but ask that it be enhanced by reference to incorporate the factors listed in appendix 2 of 2019 Colne & Crane GI Strategy (for development close to watercourses).
- Policy SP7 (Heathrow Airport): We would highlight that the CVRP CIC objects to the expansion of the airport because of the damaging environmental impact. We do not therefore, concur with your support 'in principle'. That said, we ask that the environmental criteria in this policy be strengthened to draw in, for example, comprehensive improvements across the zone around the airport down to and beyond Staines Moor - to the river systems, the green corridors, their biodiversity qualities and connectivity for active travel. Consistent with our comment against 10 a) above, a criteria should be added about minimising the environmental impact of any Southern Rail Access.
- Policy E1 (Green Belt): We ask that the policy and supporting text highlights the importance of offsetting removal of land from the Green Belt by inclusion of compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. This is as set out in NPPF, Paragraph 138, and supporting guidance and should be interpreted at a local level. The CVRP should be a candidate for such compensatory improvements.
- Policy E3 (Environmental Protection): Support.
- Policy E4 (Green & Blue Infrastructure): Please refer to the 2019 Colne & Crane GI Strategy and consider reference to the projects included with that strategy in this section, perhaps as a monitoring indicator. Also, with reference to our comment above, against Policy SP6, please consider inclusion of the factors listed in appendix 2 of 2019 Colne & Crane GI Strategy (re. development close to watercourses).