



Ministry of Housing, Communities and Local Government
Planning for the Future – White Paper consultation (2020)
**Response of the Colne Valley Regional Park Community
Interest Company**

To: planningforthefuture@communities.gov.uk

Planning for the Future Consultation
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About 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. It is championed by the Colne Valley Park Community Interest Company (CVPCIC) and I am submitting these comments on its behalf.
2. The Community Interest Company exists to protect and enhance the Regional Park through six objectives:
 - 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.
3. The CVRP is largely Green Belt and its purpose is to promote the enhancement of the area as a natural resource for the community, wildlife and the environment. The successful management and improvement of this area requires a strategic approach and careful planning. The area is shown in the inset above and overleaf.





4. Our comments on the consultation are divided between a headline response and detailed responses to the questions posed in the consultation after that.

COLNE VALLEY REGIONAL PARK HEADLINE RESPONSE

We see the need for reform, but not as proposed

1. We understand the need for some reform of the English planning system. We agree with the government that the planning system is central to tackling important national issues, including the need for specific measures to combat climate change and improve biodiversity.
2. However, we have a fundamental concern that these welcome words will not be followed through with clear and coherent proposals for changes to the planning system.
3. We question the White Paper's premise that such high levels of housing delivery are justified. We also feel the consultation places too much emphasis on housing at the expense of other critical aspects of planning and development, such as green infrastructure.
4. The consultation points to a mechanistic system for determining housing requirements but with no indication how this would be adjusted to take account of local considerations – critical factors such as Green Belt and environmental designations that are in place for important and positive reasons (including the quality of life benefits brought to people). In our view these must not be viewed merely as obstacles to development.
5. The implications for water supplies and river systems have not been thought through on a strategic scale.

The White Paper should show more ambition in relation to environmental matters to bring meaning to 'sustainable' development

6. The focus of White Paper is too much on housing delivery, whereas 'sustainable' development should embrace so much more. We are seriously concerned that, whilst proposing such a radical reform of the Planning system, the White Paper does not show more ambition in the following areas:
 - **Combatting Climate Change** – bringing carbon neutrality and environmental responsibility to the forefront so this is embedded at every stage of development - from minimising the clearing of vegetation at the start of a development, recycling existing building materials, right up to green buildings, green transport and better



drainage systems.

- **Enhancing Biodiversity** – protecting and enhancing what we have and delivering true net gain when development takes place (reinforcing what is being promoted in the Environment Bill).
 - **More accessible and better quality green space and natural environments** – highlighting this as a fundamental principle of planning, not an ‘add on’ in view of the proven benefits to physical and mental health and to the economy.
 - **Avoiding Water Stress** - new development uses more water, often in area of considerable water stress – this needs a planning system that looks at issues at a ‘catchment’ and ‘landscape’ scale, not piecemeal as now. Increased abstraction should not be an option to provide for new housing.
 - **Embedding green travel** for existing and planned development – in particular the need for much higher quality provision for active travel - walking and cycling.
7. Only with these and related priorities will we see truly ‘sustainable development’.

Local Democracy and Green Belt compromised

1. We consider the proposal to shorten plans with a zoning system of three categories (Growth, Renewal and Protected) over-simplifies the sort of spatial planning needed in the UK, and would unduly constrain planning at the local level.
2. Denying people the chance to comment at ‘outline’ planning application stage once an area is designated for growth in plans, will deprive communities of having a say in proposals directly affecting their local area. This is an unacceptable reduction of local democracy and accountability.
3. If the level of housing delivery desired by government is followed through without a national, or at least regional, mechanism to redistribute pressures, the system will inevitably be incompatible with the current Green Belt around London, as we know it.
4. The proposals would lead to large scale erosion of the Green Belt, undermining the CVRP’s task of maintaining and improving that Green Belt on the west side of London for the benefit of millions of people.
5. This will be harmful to the quality of life of people living in the capital and surrounding communities. It will harm wildlife and the environment, and undermine the real and positive effects improvements to the Green Belt can play in counteracting Climate Change.

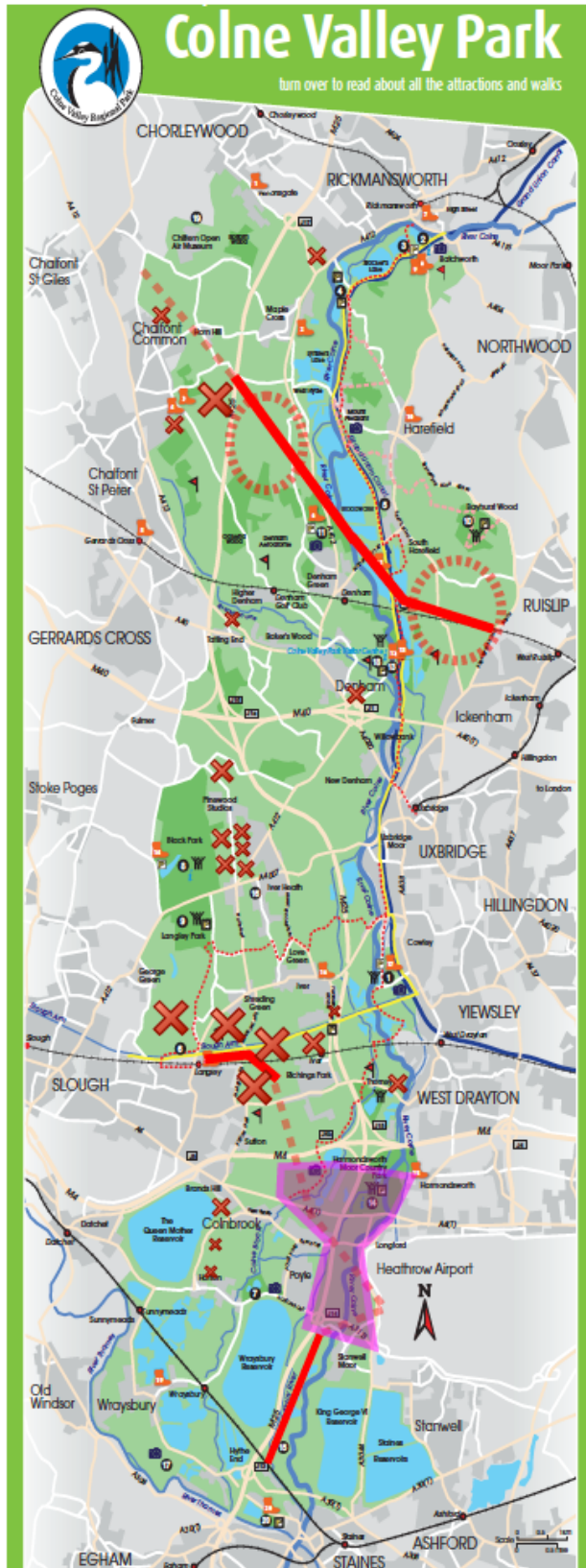


A workable system for strategic, cross-border planning is vital but is not included in the White Paper.

6. Strategic spatial planning, across physical and economic geographies (at differing scales) should be a fundamental part of the planning system in our country but is a missing ingredient in this White Paper. Without this, and some form of regional/ national spatial strategy, we fear for the implications of a piecemeal approach by local authorities, such as will inevitably occur in relation to landscapes, green belts, water resources and river systems.
7. Taking account of the planning and decision-making regime proposed, and the absence of a system for strategic, cross-border planning, we conclude the White Paper does not represent the foundation for a well-considered and balanced planning system. This is a fundamental flaw that must be addressed.
8. Urgent reconsideration is needed and we look forward to further consultation once revised proposals are formulated.

The Colne Valley Regional Park as a case study

9. As part of that reconsideration we wish to put the Colne Valley Regional Park forward as an example of a multi-authority scale area where cross-border planning is needed.
10. The CVRP is overseen by eight local authorities situated at the western edge of London. Despite being Green Belt, it has been steadily and adversely affected development, and some of the UK's largest infrastructure projects, as illustrated on the map on the following page.
11. We suggest the government adopts the Colne Valley Regional Park as a case study. This could look at how the proposed regime may work in practice and bring forward – and test – a mechanism for workable cross-boundary co-ordination and strategic planning allowing for countryside recreation, biodiversity, food production, woodland, healthy rivers and water supply. We have very good, long-standing relationships with the local authorities currently responsible for the area.
12. We would like to invite Ministers to visit the Colne Valley Regional Park. They could see at first hand the challenges we face, and why it would make an excellent case study for a new strategic planning regime. Please contact Stewart Pomeroy (Managing Agent for the Colne Valley Regional Park) - SPomeroy@groundwork.org.uk and 01895 839857.



Colne Valley Regional Park – current & recent development pressures

The **X** symbols approximately indicate development pressures arising principally from the **Plans and projects** listed below:

1. M25 Motorway Service Area
2. New school at Rickmansworth
3. Chiltern/ South Bucks Local Plan proposed development sites
4. Proposed 'Link Park' logistics hub.
5. Proposed Slough N. urban expansion
6. Pinewood Studios – recent expansion and proposed further expansion
7. RB of Windsor & Maidenhead Local Plan proposed development site
8. Proposed Waste Processing Sites in RB of Windsor & Maidenhead

This symbol approximately shows the core part of the proposed **Heathrow Expansion** within the CVRP. In addition other 'related' developments were proposed in the CVRP/ Green Belt.

Rail Projects (underway & proposed)

- HS2
- Western Rail Line to Heathrow
- Southern Rail Line to Heathrow
- above ground rail line
- approx. Hs2 construction areas
- approx. length of rail in tunnel (above ground buildings/ access shafts still feature)

Note: All the above projects in the CVRP are in the Green Belt and reflect major developments at different stages of the planning process. In addition there is a plethora of other development projects:

- mineral extractions/ gravel pits
- potential development sites as part of the Three Rivers DC emerging Local Plan (yet to be announced) *and*
- smaller schemes that have gained or are claiming “very special circumstances” status to justify development in the Green Belt.



COLNE VALLEY REGIONAL PARK DETAILED RESPONSE TO WHITE PAPER CONSULTATION QUESTIONS

Questions in White Paper Consultation	Colne Valley Regional Park Response
	INTRODUCTORY NOTE: Our response focuses on those aspects most relevant to our area and remit (set out on paragraph 2 on page 2).
PILLAR 1: PLANNING FOR DEVELOPMENT	Note: <i>text in green</i> = options given in the White Paper – our choices are in bold , with ones we do not choose in strikethrough)
1. What three words do you associate most with the planning system?	1. Vision/ Co-ordination 2. Conservation 3. Sustainability
2. Do you get involved with planning decisions?	Yes / No
3. Our plans will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and decisions in the future?	[Social media / Online news / Newspaper / By post / Other—please specify] All these methods have a role as planning is such an important issue for the community. However, the statement in the first sentence of the question is not supported. We are concerned that the proposed changes will, overall, make it harder for communities and interested organisations such as ours to have <i>meaningful</i> input into planning policies and decisions. We consider the proposed changes will make it far harder for planning authorities to have an effective strategic planning role.
4. What are your top 3 priorities for planning in your	[Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the



<p><i>local area?</i></p>	<p>affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other—please specify]</p> <p>The Colne Valley Regional Park aims to enhance a large and critical part of the Green Belt on the edge of London, and its priorities are as set out in the introduction to this response – in summary, to promote the delivery of a green and natural resource that works for communities, wildlife and the environment itself.</p>
<p><i>5. Do you agree that Local Plans should be simplified in line with our proposals?</i></p>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>See our comments in our overview response above for the supporting statement.</p>
<p><i>6: Do you agree with our proposals to streamline the development management content of Local Plans?</i></p>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>Whilst we agree that Local Plans could, generally, be streamlined, we consider the proposed changes would centralise too much at a national/ government level. There needs to be more flexibility to allow for development management policies tailored to local circumstances.</p> <p>See also our comments in our overview response above for the supporting statement.</p>
<p><i>7a: Do you agree with the proposal to replace existing legal and policy tests with a single test of sustainable development, which would include consideration of environmental impact?</i></p>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>We welcome changes that would sharpen how the legal and policy tests feature in plan making. However, the elements that contribute to sustainability are complex, as reflected in the existing regime. Any new system must embrace all matters, as now, whilst rising to the challenge of making it easily understandable for lay-people reviewing and engaging with plans.</p>
<p><i>7b: How could strategic cross-border issues be best planned for in the absence of a Duty to Co-operate?</i></p>	<p>This is a fundamental question and the absence of clear proposals in the White Paper is of grave concern. In our view it confirms reform of the planning system has not been adequately thought through. This is a serious flaw.</p>



	<p>Good strategic planning will be critical to the future of the environment in our country and delivering the needs of our communities in a sustainable way. It is about more than individual cross-border issues. The weaknesses of the ‘Duty to Co-operate’ regime as a tool to deliver strategic planning over the last decade is there for all to see.</p> <p>We consider that it is the government’s role (not respondents) to bring forward effective, carefully considered options and proposals for how strategic spatial planning could be handled at a national, regional and cross local authority scale.</p> <p>In the absence of such proposals, the White Paper is flawed and we await further consultation once it has been appropriately re-visited.</p> <p>What we do know is that the multi-authority Green Belt around London – and Colne Valley Regional Park specifically – needs strategic planning. The considerable pressure on it cannot be responded to and planned for in a piecemeal fashion if we are to see sustainable development and a properly functioning Green Belt.</p> <p>We invite Ministers to visit the Colne Valley Regional Park to see why it would make an excellent case study on why a new ‘strategic planning’ regime is needed, and how it could be crafted.</p>
<p><i>8a: Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?</i></p>	<p>[Yes/ No /Not sure. Please provide supporting statement.]</p> <p>No, because it would be premature to agree to a standard method when the mechanism for taking into account constraints has not been set out.</p> <p>On page 33 of the White Paper it states: “In particular, the methodology does not yet adjust for the land constraints, including Green Belt. We will consider further the options for doing this and welcome proposals.”</p> <p>The adjustment of any needs assessment to account for constraints has to be fundamental to any new planning regime. Like the issue of strategic planning, and our concern expressed in answer to the preceding question 7b, this amply illustrates reform of the planning system has not yet</p>



	<p>been adequately thought through.</p> <p>We await further consultation.</p> <p>What we do know is that, for the authorities responsible for planning the areas on the edge of London, the careful handling of constraints, and in particular Green Belt, is critical to successful planning. Mechanistic methods for establishing housing requirements will not work.</p> <p>We invite Ministers to visit the Colne Valley Regional Park to see why it would make an excellent case study on why a new 'strategic planning' regime is needed, and how this relates to the issue of planning for housing requirements alongside important strategic planning tools for green infrastructure around large urban areas, notably the Green Belt.</p> <p>We also highlight that there are many more development issues beyond housing that need planning for – these include water resources, food production, biodiversity and countryside recreation, yet this gets no attention in the White Paper.</p>
<p><i>8b: Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?</i></p>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>No. Any system needs to be more sophisticated and reflect the reality of how the house-building sector works. We are concerned the consultation proposals conflate affordability with housing delivery from the private sector in any particular local authority area.</p> <p>Whatever regime we end up with, it is crucial that it provides for the potential consequences of development pressure and supporting infrastructure (including green infrastructure/ green belts) planning for this at a truly strategic level. Without that, the planning system will fail catastrophically at a local level.</p>
<p><i>9a: do you agree there should be automatic outline planning permission for areas for substantial development (Growth areas) with faster routes for</i></p>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>See our comments in our headline response on pages 3 and 4.</p>



<i>detailed consent?</i>	
<i>9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?</i>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>See our comments in our headline response on pages 3 and 4..</p>
<i>9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?</i>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>If there is a case for bringing forward proposals for new settlements this should be within a national spatial plan, co-ordinated with and comprising strategic infrastructure, not simply under the NSIP regime.</p>
<i>10. Do you agree with our proposals to make decision-making faster and more certain?</i>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>Planning is a complex process and we are concerned the proposals will reduce local democratic input and accountability in planning decisions. The balance is shifting too far towards ‘pro-development’ at the expense of the positive benefits that green space can provide for people, including their mental and physical health. The vital importance of this has been brought to the fore as a result of the Covid-19 pandemic.</p>
<i>11. Do you agree with our proposals for accessible, web-based Local Plans?</i>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>Only if viewed alongside hard copy and other methods to make planning documents/ consultations accessible to all of the community affected, including those who do not use or have access to computers.</p>
<i>12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?</i>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>This timescale seriously under-estimates the complexity of planning issues and would not allow for meaningful community engagement. While ‘front loading’ of engagement at plan-making stage is good in principle, this would be very difficult to achieve in a practical way within the</p>



	restricted timescale set out for local plan preparation.
13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?	[Yes / No / Not sure. Please provide supporting statement.] Neighbourhood Plans are a valuable part of the plan-making system.
13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?	No comment in view of our remit
14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?	[Yes / No / Not sure. Please provide supporting statement.] No comment in view of our remit
PILLAR TWO – PLANNING FOR BEAUTIFUL AND SUSTAINABLE PLACES	Colne Valley Regional Park Response
15. What do you think about the design of new development that has happened recently in your area?	[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/ or poorly-designed / There hasn't been any / Other – please specify] Our prevailing concern is that too many ad hoc developments have occurred or are being progressed in areas of the Colne Valley Regional Park that are meant to be protected and enhanced as Green Belt. They incrementally undermine the role of the Park as a natural resource for the community and for wildlife, and do not lead to strategic improvements.
16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?	[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]



	<p>As well as the above:</p> <p>Improving the land within the Colne Valley Regional Park as a resource for the community, wildlife and for the environment it provides. This is vital to:</p> <ul style="list-style-type: none"> • Fulfill the purposes and functions of the Green Belt as a strategic planning tool on the edge of London • Provide natural areas for people’s physical and mental health • Enhance biodiversity • Improve rivers and the water environment • Contribute to combatting climate change
<p>17. Do you agree with our proposals for improving the production and use of design guides and codes?</p>	<p>[Yes/No/Not sure. Please provide supporting statement.]</p> <p>We are concerned that the design guides and codes are too closely associated with embracing new development.</p> <p>They should also include improvement of natural areas/ Green Belt – where development may not/ should not be planned, but where environmental improvement and improved access is vitally important to their function.</p>
<p>18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?</p>	<p>[Yes/No/Not sure. Please provide supporting statement.]</p> <p>But also note our comment against Q 17.</p>
<p>19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?</p>	<p>[Yes/No/Not sure. Please provide supporting statement.]</p> <p>No comment in view of our remit</p>



<p>20. Do you agree with our proposals for implementing a fast-track for beauty?</p>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>We are concerned that this trivialises planning decisions.</p> <p>While obviously ‘beauty’ is important, as a definition it is dangerously subjective – a matter of judgment, taste and context. Other factors must be weighed in the balance when planning decisions are made, and this risks elevating the loose concept of ‘beauty’ above other more tangible sustainability considerations.</p> <p>Houses might possibly be beautiful – but if they are grouped in ‘dormitory’ settlements with limited community, low biodiversity, car dependent and in a water-stressed environment – what’s the point?</p>
<p>PILLAR THREE – PLANNING FOR INFRASTRUCTURE AND CONNECTED PLACES</p>	<p>Colne Valley Regional Park Response</p>
<p>21. When new development happens in your area, what is your priority for what comes with it?</p>	<p>[More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / / Other – please specify]</p> <p>Because the major part of the CVRP is Green Belt our priority is to protect the open and natural environment across the Park from incursion.</p> <p>When development is approved – almost invariably to our dismay – our priority is to press for comprehensive site/ development mitigation and compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (in line with NPPF para 138).</p>
<p>22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated</p>	<p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>We do not consider that any replacement for S106/ CIL should be only linked to development value above a set threshold. It needs to be broader so that all impacts arising from proposed</p>



<p><i>Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?</i></p>	<p>development can be properly taken into account and planned for by Local Planning Authorities. This will be essential to ensure that appropriate environmental and other mitigation (often off-site) forms part of the development package.</p> <p>It will be important for the impacts of major development to be assessed, and mitigation planned for, in a strategic and cross-border way. The regime should provision for this with flexibility to deal with impacts that cannot be anticipated in advance of proposals being tabled.</p>
<p><i>22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?</i></p>	<p>[Nationally at a single rate / Nationally at an area-specific rate / Locally]</p> <p>See our answer to Q. 22(a) – it must not be assumed that there is to be a one size fits all Infrastructure Levy regime – this and following questions appear to assume that.</p> <p>It will be essential that there is a local dimension to rate setting. That may complement a nationally prescribed component.</p>
<p><i>22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?</i></p>	<p>{Same amount overall / More value / Less value / Not sure. Please provide supporting statement.}</p> <p>See our answer to Q. 22(a) – it must not be assumed that there is to be a one size fits all Infrastructure Levy regime.</p> <p>What we are aware of is that much greater investment is needed in strategic green infrastructure and the natural environment to more fully mitigate for the level of development that has occurred and may take place in some areas in future.</p>
<p><i>22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?</i></p>	<p>{Yes / No / Not sure. Please provide supporting statement.}</p> <p>See our answer to Q. 22(a) – it must not be assumed that there is to be a one size fits all Infrastructure Levy regime.</p> <p>That said, this would appear to offer appropriate flexibility for local authorities.</p>



<p>23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?</p>	<p>{Yes / No / Not sure. Please provide supporting statement.}</p> <p>See our answer to Q. 22(a) – it must not be assumed that there is to be a one size fits all Infrastructure Levy regime.</p> <p>No further comment in view of our remit</p>
<p>24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?</p>	<p>No comment in view of our remit</p>
<p>24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?</p>	<p>{Yes / No / Not sure. Please provide supporting statement.}</p> <p>No comment in view of our remit</p>
<p>24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?</p>	<p>{Yes / No / Not sure. Please provide supporting statement.}</p> <p>No comment in view of our remit</p>
<p>24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?</p>	<p>{Yes / No / Not sure. Please provide supporting statement.}</p> <p>No comment in view of our remit</p>
<p>25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?</p>	<p>{Yes / No / Not sure. Please provide supporting statement.}</p> <p>Whilst it may be appropriate to have fewer restrictions it will be important to maintain a link between the impact of development and the spending being on matters that deliver appropriate</p>



	mitigation for the effects of development.
<i>25(a). If yes, should an affordable housing 'ring-fence' be developed?</i>	{Yes / No / Not sure. Please provide supporting statement.} No comment in view of our remit
<i>26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?</i>	No comment in view of our remit