



July 2020

Dear Sir/Madam

**Re: Denham Neighbourhood Plan**

The Colne Valley Park CIC exists to maintain and enhance the Colne Valley Regional Park (CVRP) as the first taste of countryside to the west of London. The Park runs from Rickmansworth to the Thames, across parts of Herts, London, Bucks, Berks and Surrey. The six objectives of the Park are:

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.

Informed by the six objectives we make the following comments on the draft neighbourhood plan:

After paragraph 2.2 insert a new paragraph about the CVRP including that the whole of the parish lies within the Regional Park. We can help the Parish draft this paragraph should you wish.

Vision. 5.1. Add reference to the countryside setting of the villages and the network of rivers and watercourses running through the Parish

Objectives 5.2. Bullet point 3, add "Colne Valley Regional Park". Bullet point 4, add "Local Nature Reserves", change the currently unambitious "no loss of existing wildlife" to a more inspirational "increase in wildlife" that reflects the opportunity given Denham's countryside setting.

Policy DEN 7:Denham Parish Green Infrastructure Network. We support this policy in principle, but it needs to be strengthened and made more specific. This draft policy, and the

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plan as a whole, is light on reference to the SSSI's, nature reserves, ancient woodlands, hedgerows and the contribution they make to the character of the Parish.

- There must be specific reference to the Colne Valley Regional Park made within this policy and there should be specific reference to the opportunity to connect new and existing green spaces, rivers and woodlands to provide wildlife corridors.
- Para 2: add "and a contribution towards management and maintenance of green spaces and the river network".
- Para 3: the statement "proposals that lead to a loss of land....will be resisted" feels vague and potentially toothless, the wording should be strengthened so that the policy is clearer and more specific.
- Add a new paragraph that "All development within, or adjacent to, the Green Infrastructure Network must make a contribution to improvement and management & maintenance of the Green Infrastructure Network in line with the objectives of the Colne Valley Regional Park." (the objectives can be seen at <https://www.colnevalleypark.org.uk/whats-special/> and are listed at the top of this letter)
- The GI Network on the policies map should be extended to include a buffer (20m) around all Local Nature Reserves, Ancient Woodland, Country Parks, County Wildlife Sites and SSSI's. This should be included in the explanatory text relating to the policy. Consideration needs to be given to areas already developed that fall into this buffer. We suggest that this section of the policy relating to buffer zones should state "except where existing development is present", wording would need to be found that clarifies that development on existing gardens would not be eligible as part of this exemption.
- The GI network should be extended to include all rivers, streams, canals and lakes and a buffer of 10m (based on a slight extension of the Environment Agency 8m alongside watercourses rule) alongside these waterbodies. An omission from the neighbourhood plan is that there is limited mention of flooding, this is a big issue in some areas e.g. Willowbank. The addition of rivers and blue infrastructure into Policy 7 can help address this.
- As part of this GI network opportunities should be taken to create create new public rights of way or permissive routes that complement the existing rights of way network and create linkages. An example of poor practice is the cul-de-sac paths as part of the Lea Quarry restoration plan and paths as part of the proposed Crematorium at the Anoopam Mission. With a more ambitious policy in the Neighbourhood Plan developers could be encouraged to see the bigger picture outside of their site development boundaries and create linkages that enhance the network and create improved routes for residents and visitors.

Policy DEN 8: Local Green Spaces: Add the following to the New Denham sites list: Oakside Open Space.

Policy DEN 11: Economic sites. The Colne Valley Regional Park strongly objects to section D of this policy that encourages development in the green belt at, and adjacent to, the existing footprint of the gas works off Amersham Road. However, if the Parish Council decides to retain this in the Neighbourhood Plan or there is any other development within the green belt then, in line with the text and the spirit of para 138 of the NPPF, the following changes must be made to section D of the policy:

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- Bullet point 5 in addition to open space and recreation, add "and wildlife habitat including grassland/woodland edge buffer to Caps Wood and a buffer of at least 10m on developers land to the south of the River Misbourne"
- Bullet point 6. There must be a more ambitious treatment of footpath Den 11. Change "improvements considered as required" to "take the opportunity (in partnership with neighbouring landowners) to re-connect the dead-end footpath back into the rights of way network to create a circular walk for residents of Higher Denham and Tatling End."
- Add a new bullet point "ongoing financial contribution should be made to wildlife and landscape enhancement of the adjacent ancient woodland: Caps Wood"

Other policies:

The Colne and Crane Green Infrastructure Strategy must be specifically referred to in the Neighbourhood Plan including reference to the whole area schedule of opportunities and the North Colne schedule of opportunities that relate to Denham Parish. See <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>. There are two outline planning policy recommendations contained in Appendix 2 of the Colne & Crane Green Infrastructure Strategy :

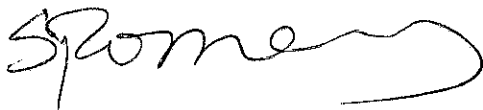
- a CVRP policy, and
- recommendations for development close to watercourses.

In Buckinghamshire these should either go into the Local Plan or the Neighbourhood plans. This is an unfortunate, and unintended, consequence of the Neighbourhood Plan being consulted on before it is clear what is happening with the draft Chiltern and South Bucks Plan and development towards a new Buckinghamshire Plan. However, this does give Denham Parish Council the opportunity to lead the way and include a Colne Valley Regional Park policy and a development near watercourses policy in the Neighbourhood Plan.

Para. 6.4 Local Infrastructure priorities. Add a new bullet point to list of developer contribution priorities: "Green and Blue Infrastructure"

We note that in Section 4 all five communities within the Parish recognised the importance of green space, agricultural land and rivers and expressed that these should remain. This local desire can be supported through incorporation of the above points into the plan

Yours sincerely



Stewart Pomeroy  
Managing Agent

For and on behalf of the Colne Valley Park CIC

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