

Western Rail Link to Heathrow

Consultation response from Colne Valley Park Community Interest Company

June 2018

Introduction

The Colne Valley Park Community Interest Company aims to maintain and enhance the Colne Valley Regional Park as the first taste of countryside to the west of London for the benefit of over 3 Million people who live within 10 miles of the Park. The Park covers an area from Rickmansworth to Staines across parts of Herts, London, Bucks, Berks and Surrey.

The 6 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.

The entirety of the proposed scheme is located within the Colne Valley Regional Park

Biodiversity

Creation of floodplain areas west of Mansion Lane must be designed to enhance opportunities for biodiversity.

Preliminary Environmental Information Report (PIER) Para 11.6.40 states 2015 and 2016 surveys did not record any evidence of Otter in the River Colne and Horton Brook. However we would like to point out that more recent surveys of the Colne Valley by Heathrow Airport Ltd (HAL) have revealed presence of Otter. Network Rail must speak to HAL and re-consider the presence of this species in its Environmental Impact Assessment – particularly along the Colne Brook and River Colne.

Para 11.6.46 We do not agree that the failure to find reptiles at Old Wood should lead to Network Rail assuming their absence in this location. Woodland edge habitat is good reptile habitat, and habitat connectivity exists in the immediate area.

The Colne Valley Park CIC believes the mitigation measures listed in paras 11.9.1 and 11.9.2 are insufficient. Much more can be done at relatively low cost, including, but not limited to:

- Para 11.9.1 Bullet point 1. We do not believe planting trees properly mitigates the considerable impact of habitats cleared to enable construction. Mature trees, such as those along the south bank of the Grand Union Canal, provide habitat for a much greater number and diversity of

species than an even-age stand of newly planted trees. The significant landscape value of the mature trees also needs to be properly considered and mitigated.

- Para 11.9.1, Bullet point 3 Receptor area for reptiles to include appropriately located south facing banks and hibernacula.
- Colnbrook residents regard Old Wood as ancient, and it is undoubtedly old woodland. However, Natural England has not recorded it as Ancient Woodland (although it should be noted that a small part of the wood north of the M4 is recorded as such). Bullet point 7 of para 11.9.1 of the PIER must be strengthened. Construction of the shaft, access road and cutting down of mature trees – given the assemblage of species they provide habitat for – cannot be adequately mitigated solely by the provision of bat boxes. A restoration and management plan must be developed for this important local woodland, along with the resources to maintain the woodland for decades in the future.
- Ambitious plans are needed to re-naturalise and restore the Horton Brook. Rather than simply considering the Brook as a means to get water from A to B, we would like to see a properly considered design to re-naturalise through meanders and improved connectivity between the watercourse and its floodplain.

We believe there is a considerable risk of pollution incidents during construction and operation. We request that in the event of an environmental incident within, or affecting, the Colne Valley Regional Park, Network Rail, its contractors and sub contractors, will offer an Enforcement Undertaking to the Environment Agency so as to secure benefit for local environment and communities. The objectives of the Colne Valley Park and the projects identified in the Colne Catchment Plan (see <http://www.colnecan.org.uk/>) should be used to inform positive and imaginative use of any agreed payment. Further information on enforcement undertakings can be found here: <https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-statement>

A clear maintenance plan for all the mitigation measures should be developed, including how this will be resourced. This is also relevant to reptile translocation areas. A mitigation plan is only as good as its maintenance strategy.

Landscape and Recreation

Network Rail has considered the Bucks and Hillingdon Landscape Character Assessments (LCA). However it must also consider the 2017 Colne Valley Landscape Character Assessment, which is available to download from http://www.colnevalleypark.org.uk/sites/default/files/LCAFinalReport%20updated%20April%202018_1.pdf This document was produced to tie together the existing 5 LCAs produced by local planning authorities across the Colne Valley Regional Park, and to fill in the gaps e.g. in Slough. It includes guidance for the protection, management and planning of the landscape which must be contributed to by Network Rail, given the extensive impact of Western Rail Link to Heathrow on the landscape. The proposed route of WRLtH runs through two Colne Valley landscape Character Areas – Richings Lowland and Colne Valley: Harmondsworth to Stanwell Moor.

With regard to Slough Borough Council policy CG1 ‘Colne Valley Park’ and South Bucks Core Strategy core policy 8 and 9, we would like to hold Network Rail to the statements in table 12.1 of the Preliminary Environmental Information Report that: “Landscape mitigation...will enhance the landscape

within the Colne Valley Park” and “maintain, restore and enhance landscape characteristics where achievable. Particular attention will be given to the Colne Valley Trail...”. This is particularly relevant relating to views of the landscape from the Slough Arm of the Grand Union Canal, the Horton Brook, countryside views from roads and footpaths, Old Wood and its surrounding landscape, the Colne Valley Trail, and the Colne Brook.

The same table (12.1), when referring to the London Plan, states: “The proposed scheme would not be located within the areas identified as regional park opportunities”. Though this is factually correct, it is misleading – this section of the table fails to mention the entirety of the proposed scheme lies within an existing Regional Park

We disagree with the statement in para 12.4.5 that no part of the study area is a tranquil area, and that tranquil areas are scoped out of the EA. We also fundamentally disagree with the implied assumption that because a landscape is already disturbed, justifying further incursions becomes easier. The Colne Valley Park CIC agrees with the Planning Inspectorate Scoping Opinion that due to the presence of canal boat residents, tranquillity cannot be excluded. Furthermore, we point out the statement in para 12.4.5 that: “these are generally defined as areas which are *relatively* undisturbed from human sources of noise and landscape disturbance”. Local residents live with the “existing industrial and transport infrastructure” and the access to *relatively* undisturbed green space is important – whether for Langley residents walking along the Grand Union Canal towpath, canal boat residents who chose to live there because of its relative tranquillity, or residents of Colnbrook walking the paths north of the Colnbrook by-pass.

We welcome the statement in para 12.6.15 of the PIER that “the Colne Valley Park is of high sensitivity as it is recognised as an area of high recreational value landscape for the local population”. However, the following table 12.2 goes on to inaccurately state the proposed scheme would run through the Colne Valley Regional Park completely underground.

The Colne Valley Park finds many of measures to reduce impact on landscape in table 12.5 far too vague, and with too many caveats to offer any genuine reassurance. For example: “Maintenance of vegetation *where practicable*”; “Avoidance of *unnecessary* tree and vegetation removal”; “maintaining *as much as possible* the ecological connection and landscape interest”. Such qualifying generalisations are completely unacceptable.

We disagree with the statement in PIER para 12.8.6 that: “no adverse effects are predicted to influence the landscape setting of the Grand Union Canal, and in the non-technical summary 1.10.23 that new scrub planting would enhance the landscape setting of the canal and strengthen green infrastructure. The south bank of the Grand Union Canal is currently lined with interspersed mature trees with gaps and views across agricultural land. The implication from the PIER para 11.9.1, bullet point 11 is that: “provision of planting to screen disturbance from trains” will enclose the Grand Union Canal and its towpath, disconnecting it from the local countryside. We are concerned this well-meaning screening partially solves one problem (the intrusion of development into the countryside and visual impacts), but immediately creates another (the enclosure of the landscape and restriction of views).

The design of the shafts with their ‘external faces of perforated metal cladding’, are completely out of keeping with the setting of the Colne Valley Regional Park, particularly Shafts 1 and 2, which are inappropriate for their locations. We are very disappointed with the ‘off-the-shelf’ style appearance of these large buildings, that are clearly more suited to an industrial estate or out-of-town retail park. We

ask WRLtH to re-design these buildings to make them more sympathetic to the countryside that surrounds them.

The shaft, access road and construction activity will have a direct effect on the landscape of Old Wood (a part of the historic Richings Estate). A management plan must be developed and its implementation funded for this precious, fragile and historic local woodland.

The creation of new sections of footpath linked to footpath IVE/15/1 are welcomed. However, while providing a potentially attractive circuit, it does not complement the existing path network within the Colne Valley Regional Park as much as it could, which would be a regrettable missed opportunity. This is particularly relevant in this part of the Colne Valley, where north to south connectivity has been severely compromised by a combination of a) the closure of path IVE/15/1 across the railway at Dog Kennel Bridge; b) the closure of path IVE/16/1 across the Slough Arm of the Grand Union Canal; and now c) the proposed closure of Hollow Hill Lane due to WRLtH. The scheme should re-instate the continuation of path IVE/15/1 across the former Dog Kennel Bridge. If this is not possible, then WRLtH should make a significant contribution towards a pot to address north-to south connectivity in this part of the Colne Valley that other developers can also contribute to.

The impact of construction work will be even greater. Therefore mitigation must be brought forward.

We do not believe the proposed mitigation properly addresses the enormous and seriously detrimental impact on the Colne Valley Regional Park, where fragile landscapes and local communities are hosting the development with no local benefits. Network Rail must (in partnership with other developers) make a contribution towards implementation of a landscape-scale vision for the Colne Valley Regional Park to mitigate for its far-reaching impact upon the Park.

Rural Economy

The scheme will result in both temporary and permanent loss of high grade agricultural land. This should be avoided, if not possible this should be reduced. WRLtH need to clarify how any loss will be mitigated.

Permanent closure of Hollow Hill Lane

Whilst transport and surface access is outside the objectives of the Colne Valley Regional Park, we nevertheless wish to register an objection to this proposed closure for the following reasons:

- Closure of this rural route where the only alternatives are through the urban area of Langley or the villages of Iver and Richings Park, will reduce the rural perception of the Colne Valley Regional Park
- Increased journey lengths for local residents e.g. travelling from Iver to Market Lane will result in increased pollution and poor air quality overall
- Cumulative impact of other developments that will have an effect on the local road network. Similar impact on the north to south footpath network that has also suffered from a lack of vision from Crossrail, when the parallel footpath across Dog Kennel Bridge was closed.
- The longer routes and increased volume of traffic will increase the time taken by our staff, directors and volunteers to travel through the Regional Park

The promoters must retain connectivity of this important link. However, *if* closure is to go ahead, Network Rail must install a pedestrian and cyclist crossing over the new railway, and maintain access under the existing line so that sustainable forms of transport can still use this important link, and so that cyclists and pedestrians are not sent on a long diversion for local journeys. Making it quicker to walk or cycle can also help reduce the number of car journeys through Langley and Iver, which will partially mitigate the effects of closing Hollow Hill Lane.