



Response from the Colne Valley Park Community Interest Company to Slough Borough Council's Consultation on "The Proposed Spatial Strategy" – January 2021

Overview

1. These comments are made in response to the Proposed Spatial Strategy (PSS) in relation to its effect on the Colne Valley Regional Park (CVRP).
2. The Colne Valley Regional Park 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 in the west. The eastern part of Slough Borough is located within the Regional Park.
3. It is championed by the Colne Valley Park Community Interest Company (CVPCIC), which is submitting these comments. The CVPCIC is mindful of the potentially significant impact the PSS could have on the Park.
4. The CIC's locus is to protect and enhance the Regional Park through six objectives, 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.
5. The Park's six objectives align with national planning policy. We highlight paragraph 141 in the 2019 NPPF:

"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."
6. This policy context is particularly relevant to the green zone on the eastern side of Slough. This is a particularly fragile and critical part of the Metropolitan Green Belt area, with a strategic role for local communities and London generally.



Headline Response from Colne Valley Regional Park Community Interest Company (CVRP CIC)

7. We recognise the pressures Slough faces – a tight boundary and a desire to accommodate development pressures. However, for the good of the community and wider environment, our response highlights that the context for those development pressures/ land supply has changed and that the protection and improvement of the Colne Valley Regional Park, a key part of the metropolitan Green Belt, requires far greater attention and weight in the emerging strategy.
8. Whilst the consultation document does not propose specific urban expansion, it paves the way for it, implying this is the right thing to do. Where the land within the CVRP is concerned we object fundamentally to this inference.
9. We welcome that some recognition is given to the CVRP as a natural resource (of the type referred to in the NPPF – para. 5 above) and its role as a buffer to London in the Green Belt. However, this is inadequate and we call for:
 - A deeper analysis of the context, value and strategic role of the CVRP in a very vulnerable part of the Green Belt.
 - More positive planning for the CVRP to be included so it can better realise its potential as a green corridor and a natural resource for London, Slough and nearby communities, acting as a permanent buffer between the built up areas.
10. Whilst we note and support the emphasis on “protecting the character, nature and identity of our suburbs” we highlight the responsibility the Council also has to the part of the CVRP and Green Belt it is a guardian of. The Borough Council is, after all, a fully signed up partner and supporter of the CVRP.
11. The changing context for planning and development and patterns of movement brought about by Covid-19 (eg home working, changing commuting patterns) and the Planning White Paper (including how cross-border planning should occur and continued protection of the Green Belt) needs deeper consideration.
12. We consider the issues raised in the consultation document require a truly sub-regional approach to address development pressures alongside the protection and improvement of the Green Belt – and with a particular focus on the CVRP area as it occupies such a strategically important part of that GB. The emerging strategy appears rooted in ‘old’ thinking and needs recasting.
13. The ‘Wider Growth Study’ is relied upon but is not yet open to public scrutiny before being “completed by the end of the 2020”. This is of great concern to the CVRP CIC and others and needs to be opened up before completion.
14. We ask that a single co-ordinated evidence base and plan is prepared for the sub-region that takes a strategic look at the Green Belt and CVRP area and how the context for meeting development pressures has changed in a post Covid-19 world. A piecemeal approach is neither appropriate nor sufficient; it needs to be strategic, in part because the Green Belt crosses so many authorities.
15. The CVRP CIC, as far as our resources allow, is committed to joint working to bring the best out of the Regional Park, and welcomes engagement at a cross-authority level to that end.



More detailed comments on The November 2020 Strategy Consultation Document

‘The Big Issues’ (pages 10-13)

16. We recognise the challenges and tight land constraints the Borough faces in trying to accommodate development pressures, but consider that this is a clear consequence of its location just outside London and in a key part of the metropolitan Green Belt (GB). We also consider that the context for this has very recently changed due to the impact of Covid-19 on patterns of life and work. Addressing the competing pressures of development and high quality green infrastructure¹ requires a strategic (sub-regional at least) analysis and solution. This is, in part, because Slough’s part of the GB and CVRP can only be properly understood and planned for in a much wider context.
17. We note (in ‘The Big Issues’ part of the document) that The Environment and Health and Wellbeing section includes some important statements, but these are not reflected in the wording of ‘Big Issue 4’ in Figure 6 (on page 10) where it simply says: “How to minimise the environmental impact of new development”.
18. The statements we particularly note are on page 11 under the ‘Environment and Health and Wellbeing’ heading (our underlining):
 - At para 9.16 “Slough does not have any nationally significant environmental sites, but there is a need to improve the biodiversity and nature conservation value of the environmental assets that already exist in the Borough.”
 - At 9.17 “Slough has some high quality parks but an overall shortage of green infrastructure for the size of its population.”
 - At 9.18 “The Council has declared a ‘Climate Change’ Motion which recognises that there is a growing urgency to combat climate change, and has committed to developing a Local Climate Change Strategy and Action Plan that will address the causes and consequences of climate change in Slough.”
19. **A new ‘Big Issue’ needs to be crafted** to pick up on the link between these three statements and the green infrastructure (GI) opportunity provided by the CVRP (and Green Belt generally) within the Borough’s boundaries, but also, critically, how that can perform in conjunction with other GI/ GB in other local authority areas adjacent to Slough that are well used by Slough residents (given the shortage of green space within the borough).
20. We highlight that, whilst also extending way beyond Slough’s boundaries, the CVRP is close enough to be of direct benefit to its residents and needs to be protected and planned for as an as an entity to realise its value as a green resource.
21. This newly crafted ‘Big Issue’ should also inform the themes and ‘guiding principles’ in the ‘Developing the Spatial Strategy’ section, and into the overarching ‘Local Plan Vision’ (page 4).

¹ Green Infrastructure that is multi-functional providing, for example, for accessible green space for peoples mental and physical health, space for wildlife and food production.



22. **We support** the statement about “Protecting the ‘Strategic Gap’ between Slough and Greater London” but consider that it needs to be broadened to reflect a positive role for this area – and the CVRP generally – to offer a natural environment for wildlife and communities, improving their quality of life, physical and mental health.
23. **We strongly object** to the statement :“Promoting the cross-border expansion of Slough to meet unmet housing needs” as the area where expansion may be suggested has not been properly assessed nor value attributed to its role as green infrastructure/ GB.
24. For the good of the local community and wider environment we believe it should be recognised that Slough Borough does not have an infinite capacity to grow, and the context for the Strategy should be recast accordingly. As we note in para. 54 below, we also highlight that there will be a major impact from the Covid-19 pandemic on patterns of life and work. This changed context affects the basic premise behind expansion and a re-appraisal is needed.
25. With regard to the **proximity of the Borough to Heathrow**, we note that in para 7.6 this aspect is seen as “one of Slough’s biggest advantages” from an economic point of view. It is noted that the proximity to Heathrow airport “also creates some environmental problems”. In that respect the CVRP CIC is only too well aware that the intensity of economic activity and a frequent disregard for adhering to planning controls creates widespread neglect of the green environment and contributes to steadily creeping urbanisation.
26. We observe that the Green Belt appears to come across too much as a planning policy constraint and an inconvenient back yard, rather than as something offering a strategic ‘green’ opportunity that should be carefully appraised and positively planned for the benefit of local residents and future generations. It is an area that has been neglected and in our view this needs to be urgently addressed with a definitive plan for positive improvement as a green resource for the community and the environment itself.

Commentary on the Spatial Strategy

27. In para 15.30 we note the comment: “Slough is surrounded by attractive countryside and it is proposed to make it more convenient for residents to get access to countryside recreation corridors such as the Jubilee River to the south, the Colne Valley Way to the east and the canal to the north.” **Whilst we support this in principle, the reference to Colne Valley Way is too narrow, and should be changed to ‘Colne Valley Regional Park’.** This will be an important dimension for the potential environmental quality and accessibility of the natural environment for residents in Slough and nearby settlements.
28. We ask that before the Local Plan moves to its next stage, work is commissioned to consider this potential and the barriers to accessibility and connectivity that need to be overcome. A good starting point would be to use and interpret, at a local level, the 2019 Colne and Crane Green Infrastructure Strategy and ‘Joint Connectivity’ work undertaken during the period when Heathrow third runway



proposals were under consideration. Reference to this 2019 Strategy as a source document needs to be clarified and strengthened in the Strategy.

29. We note that in para 15.31 it states: “A key principle of the Spatial Strategy is that there should be no loss of parks or public open space.” We are **fundamentally concerned** about statements in the Proposed Spatial Strategy document (for example in para. 17.19) that suggest loss of a significant amount of land within the CVRP is being contemplated to meet part of the area’s housing needs. **The CVRP is a form of ‘park’ and its value as a critically important area of green infrastructure, which derives from its extent and strategic role, should be explicitly recognised and ruled out as far as future urban expansion is concerned.**
30. As stated elsewhere in this response, the Park needs a positive and creative vision as part of the Local Plan, and must not be seen as a land resource for development.
31. We remind the authority that the CVRP was designated in 1965, with Slough Council’s predecessor authority one of the founding bodies, and its protection improvement and value to surrounding communities remains highly relevant today.
32. With intensifying pressure for urban development – piecemeal erosion of the Park and poor maintenance of active travel routes/sites – the **prevention of urban sprawl into the Park is more important than ever.**
33. This is at a time when there is a heightened awareness of the importance of the natural environment to people’s physical and mental health, and recognition of its potential to enhance biodiversity and combat climate change. Once land is lost to the Park, it is lost forever.
34. We are encouraged by the Council’s Open Space Study, but call for the exercise to be broadened to embrace a comprehensive look at the areas of green belt, their connectivity with surrounding green areas further afield, with an audit of active travel routes, barriers to easy movement on foot and by cycle, and the potential for improvement to aid connectivity. The CVRP should be a key part of that.

Protecting the “Strategic Gap” between Slough and Greater London

35. The recognition in para 16.2 that: “The area suffers from a large number of environmental quality problems due to its proximity to the airport and the motorway network and is acknowledged as being one of the most fragmented and vulnerable parts of the Metropolitan Green Belt” heightens the importance of developing a strategy to reverse what has occurred, and rectify the problems.
36. Whilst the CVRP welcomes the decision (at paras 16.7 onwards) not to plan for growth associated with Heathrow Airport in this Local Plan, we remain very concerned about the impact of planning blight on the area around Colnbrook and Poyle (and beyond). This manifests itself in poor maintenance of sites and often temporary and unauthorised urban activities that degrade the natural



environment. As we mention above, a strategy is needed to specifically combat this.

37. We believe the expansion of Heathrow is a legacy of planning for past trends that the Covid-19 crisis and climate change policy will fundamentally change.
38. The prospect of future expansion at Heathrow and outward expansion of Slough into the Green Belt (and CVRP) referred to in the Proposed Spatial Strategy only serves to foster planning blight. We object to this: the Green Belt and CVRP must be seen and conveyed as a long-term designation.
39. The area of Green Belt to the east and north-east of Slough falling within the CVRP, is particularly sensitive and vulnerable. In the strategic Green Belt review undertaken by Arup and published by former South Bucks and Chiltern District Councils in 2018, this zone was categorised as part of the coherent 'London Fringe zone (Strategic Area A). The report flagged the characteristics and sensitivities of the part of that zone around Slough, referring to:

“... a strategic arc of open spaces separating the large built-up areas of Greater London and Slough, and smaller settlements such as Iver, Iver Heath”

“...a number of narrow bands of Green Belt are vitally important in preventing merging of settlements .”

“...these gaps are essential in protecting the merging of the major urban settlements of Greater London and Slough (and the smaller settlements of Iver and Richings Park) ...”

“ ... any change within this area could act to significantly compromise the role played by the Green Belt in maintaining separation between these two large urban settlements.”

40. It is evident that the strategic role of the Green Belt in this area to the east and north-east of Slough, and the future potential of the CVRP as a natural resource for the wider community and wildlife, needs particular attention and planning.
41. We look forward to constructive engagement with Slough and Buckinghamshire Councils to that end.
42. **We object to the suggestion of a Park and Ride site in the CVRP (16.29).** We consider there is insufficient evidence available to justify it, it will urbanise part of the CVRP and GB, and will represent another piece of planning blight. We also question how this proposal sits in section 16 of the consultation document, a section headed “**Protecting the “Strategic Gap” between Slough and Greater London**”.

Colnbrook and Poyle Green Envelope (page 50)

43. **The initiative is supported as far as it goes** but we consider it needs to be broadened to assume a more strategic green infrastructure role within this critical part of the CVRP and GB.
44. We welcome that the 'Green Envelope' area could benefit from various environmental improvements arising from a “wider green infrastructure



strategy” (para. 16.33) and “better connecting a network of cycling and walking routes from Colnbrook Village to Stanwell Road, and connect to existing areas such as Arthur Jacobs Nature Reserve” and “actively managed” (para. 16.34). However, whilst we agree with the concept that when development does take place in the CVRP funds/ developer contributions arising should be ring-fenced for improvements within the CVRP area, it is unacceptable that the desirable environmental improvement measures should be subject to and solely funded by “... a mitigation package for any development that took place in the Colne Valley Park”. We also ask that this section specifically links to delivery of the Colne and Crane Valleys Green Infrastructure Strategy.

Improving the Colne Valley Regional Park

45. Where, in **para. 16.37**, the main functions of the CVRP in Slough are referred to the **wording needs to be stronger** and we ask that it refers to the Colne Valley Regional Park providing:

- Existing and potential future access to areas of natural environment for the recreation and the health and welfare of local communities;
- Existing and potential habitats for wildlife, achieving greater biodiversity;
- Connectivity with other parts of the Regional Park and networks of green spaces beyond;
- A green buffer to London and other urban areas in one of the narrowest and most sensitive sections of the metropolitan Green Belt.

46. We welcome the reference in para 16.38 to the Green Infrastructure Strategy, but ask that it be properly referenced (the “Colne and Crane Valleys Green Infrastructure Strategy” and “co-ordinated by” rather than “prepared by” the CVRP).

47. We support the reference to environmental enhancement projects but consider only referring to them as being “funded as part of the mitigation from any development that comes forward” is too narrow. Other funding sources can and should be referenced, including funding associated with climate change and other environmental or community strategies and partnership approaches. See also our comment at para. 43 above.

48. As far as our resources allow, the CVRP is committed to working with the Council to promote improvements to the natural environment and active travel connectivity in this area, including those measures highlighted in para. 16.39 in the PSS.

Promoting the cross-border expansion of Slough to meet unmet housing needs

49. **In so far as it is intimated that urban expansion may be proposed within the CVRP area we object to this section.**

50. **We question the level of unmet need** as government policy/ prescription on housing numbers is under fundamental review and because of the impact of the Covid-19 pandemic. Of particular importance, because of the potential impact



on the GB and CVRP, is a sub-regional approach to the future planning of these areas as future 'green' resources.

51. **We also question** the guiding principle (17.4) that development should be located in the most accessible locations. Whilst this is an important factor we consider that the importance of the Green Belt, and specifically **the CVRP and the long-established green infrastructure it provides, needs to be factored in as a guiding principle, too**, as it is of enormous strategic significance.
52. **Green Belt sites:** Whilst we understand the need to appraise sites in the GB they should only be looked at as part of a strategic assessment – including how para 138 of the NPPF (regarding wider improvements to the environment and accessibility) can be fulfilled.
53. **Wider Area Growth Study:** It is noted that the “report is due to be completed by the end of the 2020 and will then have to be agreed by the commissioning Councils”. As this exercise is of great significance to the public and interested parties, we consider that its supporting evidence and preliminary findings must be subject to public consultation and scrutiny before being agreed by the Councils.
54. **In the 'new normal', post Covid-19 world, we anticipate dramatic changes for places like Slough and the pattern of its commercial centres. New studies are needed** that factor this in as (to a greater extent than already assumed) existing offices and large shops will become redundant and offer scope for conversion/ redevelopment to new uses. This will enable additional residential development to be accommodated within the Borough through change of use and change the capacity for additional residential development. In turn, the conclusions reached in the emerging strategy about the extent of land shortage would change (reference paras. 9.3 and 9.23 in your consultation document).
55. We believe that the major impact from the Covid-19 pandemic will change life and work patterns and, consequently, the pressure for Slough to expand into the surrounding countryside. The wider growth study needs to take this on board.
56. We note that at para. 18.2 a focused consultation is proposed in 2021 on the proposed Green Belt site releases in Slough. Whilst, in principle, we oppose urbanising development within the CVRP, if there is to be consultation on proposed release of a green belt site within the Park area we consider that it must be conducted alongside consultation on the emerging 'Wider Area Growth Study'. In this way the intended strategic approach to the wider Green Belt and future approach to the CVRP can be assessed.

General comments on the supporting Sustainability Appraisal

- The updated version of this appraisal will be a key document underpinning the final strategy and Local Plan. However, in line with the comments we have made above on the PSS, we consider that **far too little attention and weight is given to the Green Belt and CVRP.**



- The **GB and CVRP are part of a long-established and vitally important strategic network of green infrastructure, and therefore a far more positive approach is needed** for them in the SA. One that recognises their enormous potential for future enhancement to fulfill a number of roles e.g. for the benefit of the health and welfare of communities, for their wildlife/ biodiversity/ combatting climate change role and for separating urban areas. It is not merely about protecting them to an appropriate degree.
- **We take issue with, the statement in para. 9 on page 7 of the SA**, where it says a sustainability issue is the ... “Quality of undeveloped land (Large areas of landfill, low demand and limited supply of versatile agricultural land).” This is unsubstantiated. We believe that, rather than there being low demand for farmland, the uncertain future planning status for agricultural/ Green Belt land in this area, created by the Council’s actions results in considerable hope value and planning blight, rendering it harder for agricultural uses to compete.
- The CRVP recognises, in its core objectives, the importance of a vibrant agricultural economy. As well as playing a key role in the enhancement of the Green Belt and the green buffer, it also underpins other access, biodiversity and landscape objectives. In the light of changing purchasing patterns towards more local food supplies, Slough Council should give greater consideration and priority to the value of a working and food producing landscape.
- This brings into question how the SA is constructed, and the basis for the Wider Area Growth Study, jointly commissioned with Windsor & Maidenhead and Buckinghamshire Councils (pages 19 and 20 of the SA).