



1 Question and Answer Summary

Questions raised during the webinar are summarised below, together with comments given by the Panel after presentations and, where that was not possible because of time, some comments have been added by panellists after the event. Please note that comments given reflect thoughts of the speakers as individuals and not the Colne Valley Regional park as an organisation.

1.1 Environmental Dimension

Should we be declaring a climate change and nature emergency to help deliver biodiversity net gain?

It's difficult to separate them out. In terms of climate change, it is looking at emissions. However, if you look at this holistically, many of the solutions are nature based. So, you have to look at the two together as they are interrelated. Any climate change strategy would need to incorporate nature-based solutions, which is part of the thinking about Local Nature Recovery Strategies. How do you build in that thinking in terms of carbon management and biodiversity net gain? Healthy ecosystems are the basis of our ability to survive and thrive, so they are absolutely interlinked.

How should biodiversity net gain be monitored to ensure that what developers promise in applications is delivered on the ground?

Once the Environment Bill becomes law, local authorities will have two years to prepare and to actually deliver local schemes. Now some authorities will be ready earlier than others. The government is very well aware that you need to have trained ecologists based at local authorities to be able to assess / evaluate the data that is coming in with applications. At the moment a lot of authorities do not have that capacity and that has been pointed out. If you are going to have successful implementation of biodiversity net gain, you are going to need those trained ecologists to be able to evaluate the information that is coming in, advise planning officers and then monitor post that. So that is fundamental to it being a success, to have that intelligence at local authorities, for ecologists be able to evaluate that.

How and when to monitor Local Nature Recovery?

All pilot areas fed back to government that monitoring wasn't addressed. We will need to await the finalised guidance from government, but monitoring will need to be a country-wide issue as the Local Nature Recovery Strategies need to support national targets. It makes sense to coordinate monitoring with the Local plan process, as part of a cycle for LNRS's to be updated or reviewed every 5 years.

How can Neighbourhood Plan policies help Local Authorities prepare Local Nature Recovery Strategies?

It's a two-way process. As part of that exercise in terms of understanding the baseline data, what we are asked to do as part of the guidance is to understand at the start of the process what exists out there in terms of existing priorities and plans, which would include Neighbourhood Plans. However, once you have gone through a process of creating a document together with the local stakeholders, it is there to help inform them going forward.

Will the Local Nature Recovery Strategy pilot mapping outputs be available to Neighbourhood Plan groups?

At the moment, the mapping outputs in terms of our prototype has been a submission to DEFRA in terms of a learning exercise, so they have not been published yet. A lot of the baseline data is published, so that is freely available and can be circulated around. When we do the real thing, the mapping outputs will be available.

How do you integrate environmental policies within the planning System and how they are given appropriate weight at planning Committees? Is there a risk of danger of just playing lip service to these ideas? When will we know if the NPPF will adopt these measures?

As we have gone through the pilot process in terms of Local Nature Recovery Strategies, we have had a bit of an insight into government thinking, which has been really helpful. In terms of reassurance, dialogue is going on between DEFRA and MHCLG. These are two key government policies and there is a willingness to understand how these key environmental objectives are embedded / incorporated into the planning system. This kind of joined up of policy thinking is needed. Because you are right, these environmental policies do need to have sufficient weight in terms that they are taken on board. We are expecting guidance on the weight to be given to these evidence base studies.

Is there a timescale for the introduction of Nature Recovery Strategies?

The guidance with respect to Local Nature Recovery Strategies is expected late summer / early autumn. Authorities will be required to start producing these, assuming the bill gets

royal assent, from spring of next year. So, they will need to start on the process from spring of next year.

Local habitat maps are really helpful, but what if you do not have that mapping and you are relying on desktop studies. Is there a danger that species of interest will be overlooked or developers get off lightly?

In terms of the work we have done to date on the Local Nature Recovery Strategy, initially there will be gaps in the evidence base. One of the feedbacks from all the pilots is that we probably know where the habitats are and their extents but what is less clear is conditions of those habitats. That is a big omission and it is not clear how DEFRA addresses that going ahead.

There is a whole variety of datasets that we have pulled together, both national datasets and local datasets that, for instance our local environmental record centres hold. There is a good evidence base that we have got together to inform Local Nature Recovery Strategies. But certainly, condition of those habitats was an issue and that is one thing we have fed back. How they go about updating that is unclear because you are going to need that to monitor progress on these.

1.2 Sub-regional and National Planning Context

How can we use the planning system to build multi-functional use of Green Belt and to stem the loss of land for food production?

It goes back to the strategic approach. The London Plan has already tried to introduce a multi-functional approach and have got away with it. So, there is no reason why we cannot do the same sort of thing through Local Plans. It's linked to the issues around how you determine your exceptional circumstances. The one word I will use is 'vision'. Everything you do in a Local Plan, not one policy stands on its own; has to be seen within that wider approach to place making, the vision and your objectives. What are you trying to do in your area for the next 10-15 years? How are you going to change it? What policies do you need to make that work?

So, how do you determine whether there are exceptional circumstances to release Green Belt? Well, you have to take into account what your priorities are, what is it that you are trying to do? That could be as simple, as in the case of Guilford and that high court challenge, where they decided that their housing needs were overwhelming, and they had no other way of meeting it. They took the decision that this was pretty much sufficient to pass the test of exceptional circumstances. But it could be that more directly affordable housing is your priority and the conclusion is that you know you are going to lose more by losing Green Belt sites than you are going to gain in terms of affordable housing. But it must be tied back to the wider issues that you mention. So, it is about issues around overarching objectives about climate change, health and well-being, supporting active travel etc.. and also, that really fundamental issue of what is metropolitan Green Belt? Its fundamental role is to separate London from other parts. How do you tackle that through your exceptional circumstances cost benefit analysis?

So, all these issues around food production and things like that, they all come up in terms of any approach to land management. Your land management strategy and everything else should layer onto your Local Plan, as does your local transport plan and everything else. But in order to have that integrated approach, you need a better approach to strategic planning.

So, in Surrey, we have got the Surrey Place ambitions, where we are trying to do just that. We are trying to overlay Local Plans with land management, with the overarching approach to the economic strategy, the local transport plan, climate change, health and well-being. So, we are trying very much to overlay all these different things to give us a good approach to strategic planning and how we use land in every different way. But the system just does not support that at a statutory level at the moment unfortunately with Local Plans. That goes back to the issue raised about what weight Local Nature Recover Strategies will have in terms of local planning. You need an integrated approach at government, you need a cross-departmental approach to this, or we are not going to get anywhere.

How do you do a cost benefit analysis for Green Belt release? Is there any guidance or a methodology to follow?

No, there is not any guidance available in terms of national planning guidance.

Cost benefit analysis should be linked directly to your Local Plan objectives. You should be able to look at whether you need Green Belt release based on what you will achieve out of it and what the costs of that are going to be. It is an interesting one in terms of what the NPPF says because it does not say that “you have to meet your needs in some of these areas”, it says “you should do your best to meet your needs”. But if the costs of releasing Green Belt, for example, outweigh some of the national priorities then there is nothing that says you have to. meet your full needs in the standard methodology. I think that is where we have gone slightly wrong.

It is down to the local authority to decide what factors they take into account, in that cost benefit analysis. It is exceptional. in that sense, and it is down to the local planning authority to decide what weight they give to the different factors in the cost benefit analysis. But it does needs to be linked back to your vision and objectives. What is it you are trying to do through your placemaking activity in the first place? What is it that your local plan is going to deliver? How will that cost benefit analysis fit within that wider sort of approach, that strategy and vision you are trying to deliver?

Does Metropolitan Open Land have the same power as Greenbelt?

No but it is getting more like Green Belt because the thing that distinguished it to Green Belt before was its permanence and the fact that it should remain pretty much intact, unless again there are exceptional circumstances, a real need to review it. Metropolitan Open Land still has a very high status and I think some would argue equal status, but that sort of permanence issue is not applied in the same way. But Green Belt does not have that permanence anymore either, so they are probably more similar than they should be nowadays.

I think one of the issues for Local Plans is that you are reviewing a Local Plan every five years and it gets back to that sort of hope value. How on earth do you improve open land if it is Green Belt? If you have got a scrappy bit of Greenbelt that is not very accessible, how do

you make it more accessible? How do you improve its overall call quality so that you do get those multi benefits, whether it is Metropolitan Open Land or Green belt?

One of the issues there is the permanence used to allow you to do that because there is less hope value but now because we have got Local Plan reviews every five years and there is an assumption that everything gets thrown up in the air every five years, and therefore that means Green Belt is vulnerable every five years. That hope value is much, much higher, whether it's Metropolitan Open Land or Green Belt.

So we need to get to a place where there is probably not that much distinction but both are valued in terms of their permanence and there is an assumption that every time you review a Local Plan, you do not necessarily review that bit of it and it gets back to that overall strategy and vision. It is the tools to deliver it that should change, not necessarily the overall strategy and vision that should change every five years. That is how we used to do it but now the assumption is that we start with a blank sheet of paper every five years, which is not how long-term place shaping should play out.

Is Metropolitan Open Land stronger than Green Belt because it cannot be released without the consent of the Mayor of London whereas Green Belt can be released on the decision simply of the local authority.

That is fair enough. It comes down to the decision maker. It does not make it stronger probably just means that it is harder to get that released.

How do we persuade the government to stop planning by numbers?

It is a shame that I even heard the Planning Minister talk about housing strategies and housing plans as opposed to Local Plans. It is a huge issue. A whole generation of planners since 2012 that is all they have known. I think that is a real shame in terms of the profession that we have got planners that are looking for housing sites as opposed to developing long term place shaping strategies.

I guess playing Devil's advocate, the NPPF as it is written now allows us to do good place making and deliver Local Plans that are not just about numbers. But it is all in the application because anytime planners engage with government / civil servants, they are told they have to meet the housing needs / they have to meet the standard methodology and that is not what the NPPF says. So, I am hoping that we will get a little bit of a push back now and that we actually really start doing proper place making Local Plans and strategies, which the NPPF allows and less focus on housing numbers. But it will need a few brave councils to do that - to start testing the water. Given that we are going to have a lot of local planning authorities around the edge of London coming forward with their Local Plans now, I am hoping that at least some of them are willing to take that sort of brave decision on behalf of the rest and challenge it a little bit.

How do we achieve consistency with sixty-six different local planning authorities with different views on what exceptional circumstances means?

It is impossible to do that unless you have a strategic context. Whether it is at a regional level or at a county level, there needs to be a way of testing different spatial options and setting the general extent of the Green Belt. Then say in order to deliver our growth strategy, we need to release Green Belt here and here but not anywhere else. Unless you have got that strategic context, you are going to have a whole load of different approaches to exceptional circumstances.

Under the current system, it is down to individual local planning authorities to set the context of their exceptional circumstances through cost benefit analysis. The only way you can do that is if you have a really strong vision for your area as a place and how it is going to grow and how it is going to respond to some of the really big challenges around climate change and improving health and well-being as well as meeting housing needs. If you have got that, then you will be able to set out your exceptional circumstances through that cost benefit analysis.

Others may learn from that. But every local planning authority under the current system is unique, so everyone will have to set their own exceptional circumstances. Some like Guilford, will decide that there are exceptional circumstances because of the housing need, others will decide that there are other factors that are more important than meeting their needs in full. So that is where we are at the moment unless there is something around strategic planning coming through the planning reforms to address really critical issues like this.

1.3 Colne Valley Regional Park – Development Pressures and Responses

How do you propose to tackle the decoupling of regional economic and environmental planning policy? For example, where the value of ecosystem services, agricultural land management and voluntary community services get properly taken into account and integrated into holistic planning?

The combination of ecosystem services and agricultural land management in a holistic approach reflects exactly what the Colne Valley Regional Park is about. When the park makes its representations on plans and proposals, it does that in the light of what our objectives are. So, my answer would be we press for it, but unfortunately, the regional park has no executive powers to direct that these things happen. So, at the moment with each authority preparing its own plan and no strategic overview plan, it is down to those authorities to take into account our comments and comments of others. So, we support very much the whole concept that has been put forward there, but it is not for us to implement, it is for the local authorities.

How can we enhance the protection of the Colne Valley Regional Park?

That is one of the things that lay behind getting the green infrastructure strategy in place in 2019. We are keen that local authorities pick up the strategy and interpret / use it to inform Local Plans. We want that strategy to be developed and taken on another stage by the local authorities. It would be much better if it is in concert together as a wider strategy but nevertheless picked up by each authority, put into an evidence base and that then informs the Local Plan.

It goes back to the vision and objectives of each authority in their Local plan. If they have got a vision that shows that the Colne Valley Regional Park right on the edge of London should be a protected area and improved, not just a backdrop for various development proposals, then that can inform the whole nature of their strategy, their implementation. So that is the sequence that we see, but it has got to be picked up by the local authorities.

There is frustration about some individual applications. Some of these individual applications outside the plan making process are huge – they are strategic proposals (e.g. around Iver Heath). These applications need to be thought of in the same way, we cannot just treat them in a little bubble because it is about knitting together the landscape and making it better for people to use and access green corridors. We have got think strategically, it is not an ordinary planning application.

There has been a proposal to consider extending the Chiltern's AONB and for that to cover part of the Colne Valley Regional Park. What do you think about this proposal?

The character of the north of the Colne Valley Park, including across to parts of Hillingdon, is very similar in landscape character to the Chilterns. The Colne Valley serves as a gateway to the Chilterns for Londoners, but also, and very importantly, as a buffer to the Chilterns. If the Colne Valley were to vanish, which some of the presentation maps show that might happen, then all these rural urban fringe issues that we are experiencing will go right up to the edge of the AONB.

We have had discussions with the Chilterns AONB in the past about the boundary review and we have recently contacted to reopen those discussions. At least one of the local MPs is making a similar point about the boundary review for the AONB looking at the Colne Valley Park as are some local councillors. We are happy to continue those conversations to keep those things going.

The key point to make is that the Colne Valley Park really needs the status, powers and resources to enable it to act as the champion for the countryside. Linking up with the Chilterns AONB / national park is just one way this could happen but there are others. Local authorities can do it; they can coordinate better across administrative boundaries and have stronger policies that link up to each other. We can look to national government for looking at the Colne Valley in its own light as a resource for countryside on the West of London. So, there is lots of opportunity to be taken, but we need to get those conversations going fast now.

There are various examples of proposed developments within the Green Belt as well as proposed releases of the Green Belt as part of emerging Local Plans. How can the ideology of Green Belts with the desire to enhance these spaces be balanced with the pressures to develop given the financial benefits associated with growth?

I think it goes back to having a strategy that is not only about meeting housing needs but is also about improving your natural environment and how it connects up. That is a key part of your evidence base and about bringing to life the Green Belt in the ways that it should be.

I am not an expert on what every authority has done but I do remember when Windsor and Maidenhead went to their Local Plan examination, they had a green infrastructure strategy. I am not saying it is perfect, but it was a green infrastructure strategy that set a tone. I think that is critical for every authority to do the same. It is a question of do you believe in that or is just about trying to tick boxes of meeting the development needs.

Over and above this and I think this is what the government is probably concerned about is, if one authority does not meet its needs and does not pass it onto its neighbouring authorities under duty to cooperate, then the net effect is we do not meet our needs. What that goes back to is the need for strategic planning and needs being met in sensible locations. We are at a really important stage of reform with the planning system and I just hope that the government get it.

2 Attendees

141 attendees were recorded as joining the webinar. Thirty-nine attendees were anonymous, the remaining 102 came from the following organisations:

Hertfordshire County Council, Heathrow Strategic Planning Group, Chalfont St Peter parish council, City of London, Spelthorne County Council, Berkshire Buckinghamshire & Oxfordshire Wildlife Trusts, The Chiltern Society, Woodland Trust, TFL, Royal Borough of Windsor & Maidenhead, Hillingdon Council, Buckinghamshire Council, Chiltern Society, Surrey County Council, Slough County Council, Wild London, GIGL, 3 MPs, National Trust, Reigate & Banstead Council, Heathrow, EHM Ltd, Iver Parish Council, Three Rivers Council, CPRE London, Thames Water, University of the West of England Bristol, London Assembly, Natural England, Runnymede Council, Environment Agency, Chilterns Area of Outstanding Natural Beauty, Royal Town Planning Institute, Grondon, Chiltern and South Bucks Council, Wycombe Council, Fulmer Parish Council, Forestry Commission, Sustain, NHS, Thames 21, Groundwork, Historic England, Tandridge Council.