

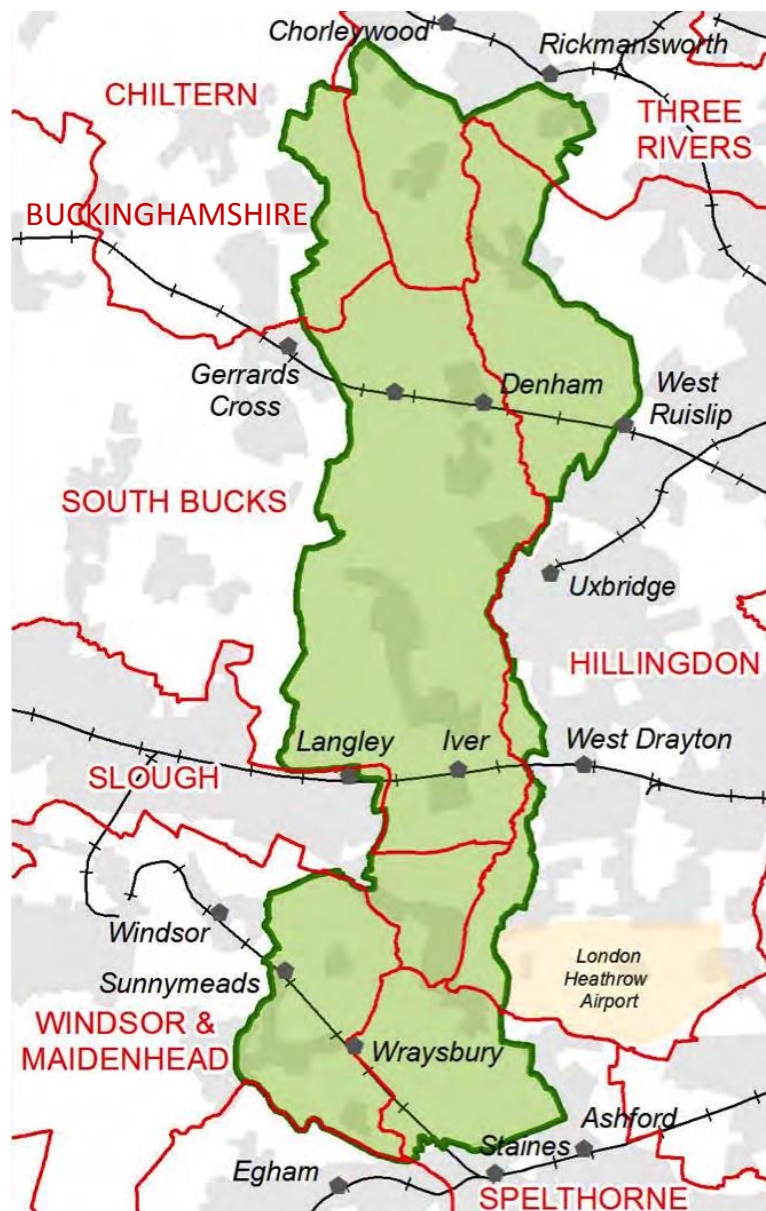
# Response from Colne Valley Regional Park to Three Rivers Local Plan consultation August 2021



## The Colne Valley Regional Park

The Colne Valley Regional Park was founded in 1965 when local authorities – including TRDC’s predecessor, Rickmansworth Urban District Council – agreed to work together to preserve and enhance the area for recreation and nature conservation.

It is supported by more than 70 member organisations including local authorities, businesses, residents’ associations, environmental charities and user groups. Groundwork South acts as the Colne Valley Regional Park’s managing agent.



## **The Colne Valley Regional Park has six objectives:**

<https://www.colnevalleypark.org.uk/whats-special/>

### **Landscape**

The Colne Valley Regional Park (CVRP) covers eight local planning authorities. As a result, the valley is rarely considered at a landscape scale.

The creation of a Green Infrastructure Strategy <https://www.colnevalleypark.org.uk/green-infrastructure-strategy-downloads/> for the Colne Valley Regional Park aims to bring the green and blue on the map to the forefront of planning policy and decisions, and feature the landscape of the Valley as a whole, rather than from the perspective of its various council boundaries. These boundaries are an administrative convenience – they don't exist as real barriers to people and wildlife. The Crane Valley has been added to this strategy in order to provide a truly landscape-scale picture of the area.

This cross-border approach is entirely consistent with Green Belt policy in the National Planning Policy Framework.

Unfortunately, although the northernmost part of the Park lies within Three Rivers District, the council is not currently a member of the CVRP.

### **Summary of response**

In our view, TRDC's Local Plan Consultation fails on the basis of soundness.

The evidence base, particularly the Green Belt assessment, the sustainability assessment and the landscape appraisal, do not justify the site allocations. In most cases the evidence base actually recommends not allocating the proposed sites within the Colne Valley Regional Park. As a consequence, the golden thread that ought to run from the evidence base to the site allocations is deeply compromised.

The need to maintain the openness of the Green Belt ensuring it provides a natural environment resource for the long term has been given inadequate weight in this emerging Plan.

Whilst the Metropolitan Green Belt extends many miles beyond London's built-up area, that 'inner' part right on the edge becomes a more critical buffer and plays a vital natural environment role for communities – a rationale that led to the establishment of the Regional Park in the first place.

The Plan fails to include a policy to compensate for the loss of Green Belt in line with the National Planning Policy Framework (NPPF).

There is therefore insufficient justification for removing the site allocations within the CVRP from the Green Belt. We regard the amount of land lost from the Green Belt to be excessive and believe it will harm its openness and have an adverse impact on landscape, views and biodiversity.

There will also be problems with excessive noise, light pollution and worsened air quality from the motorway. Local roads in Maple Cross will not be able to cope with the additional traffic, and this

will inevitably lead to pressure to urbanise these roads, further undermining the rural character of the locality. Many of these are single track, with no lighting or pavements.

The proposed sites for 1,500 new homes are not in a sustainable location, being distant from public transport hubs and services. It is likely that due to the lack of public transport most of the new residents will have to use their cars.

Lynsters Farm in Maple Cross is proposed for warehouse development. Again, this is a totally unsuitable use for this sensitive site involving loss of agriculture, proximity to a heritage asset – the listed farmhouse, a local nature reserve at Maple Lodge immediately to the north of the site, and the adjacent lake. The site is also prone to flooding.

In addition the sites located within the Colne Valley Regional Park (CVRP) namely Batchworth Park and Maple Cross, will involve the removal of undeveloped land from both the Park and the Green Belt, a step that would be seriously detrimental to the rural environment, and negatively affecting the six objectives (see above) that are so important to the continued success of the Park.

We are both surprised and disappointed to note there is little acknowledgement of the CVRP in the Plan, and the role it is there to play, even though it makes up a significant proportion of the southern part of the District. Other planning authorities have included a dedicated policy which protects the Park from unsuitable development and seeks its improvement as a 'natural' landscape.

Although there is a presumption for sustainable development, Maple Cross is not the most sustainable of locations due to its isolation from a town centre, its lack of shopping facilities, poor public transport, and unsuitable rural road network. The SA – see below – confirms this. Although it is recognised that development of the scale proposed is intended to improve the sustainability of the existing settlement, the loss of Green Belt and the detrimental impact on the local environment militates against any such gain.

Removing so much land from the Green Belt, which performs strongly against the five purposes set out in the NPPF, do not meet the exceptional circumstances required for removal.

The Council is not required to deliver its entire housing need if there are exceptional circumstances, such as the 76% of Green Belt land in the District, and until all avenues including intensifying the use of existing town centres and the change of use of existing commercial developments have been explored.

*Paras 141 of the NPPF states:*

*Before concluding that exceptional circumstances exist to justify changes, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.*

- a) Makes as much use as possible of suitable brownfield and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) and has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development through the statement of common ground.*

The Council appears to have failed in its duty to co-operate as the SW Herts Strategic Plan is still in progress. This document will be able to look at Green Belt removal, if justified, at a sub-regional scale, as well as delivering housing in the most sustainable locations.

### **Green Belt Assessment**

The Council must assess the Green Belt to see if it meets the five purposes set out in the NPPF, **and only release land that does not meet those objectives.**

This work has been carried out but has not apparently been used to influence site allocations. This map clearly shows that most of the land proposed for release still meets the NPPF purposes.

The maps attached show parcels of land categorised. The sites proposed for release all fall into the moderate, moderate high or high category. This indicates that they should not be released. The land surrounding Maple Cross is considered as providing a significant contribution to Green Belt purposes.

Maple Cross is an unsustainable location not well served by public transport – see para138 of NPPF.

If land is removed from the Green Belt the NPPF states that compensatory measures should be applied. This important point appears to have been omitted from the plan, thus making it unlawful in terms of compliance with Government policy.

These paragraphs in the 2021 NPPF are relevant:

Para 141

*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*

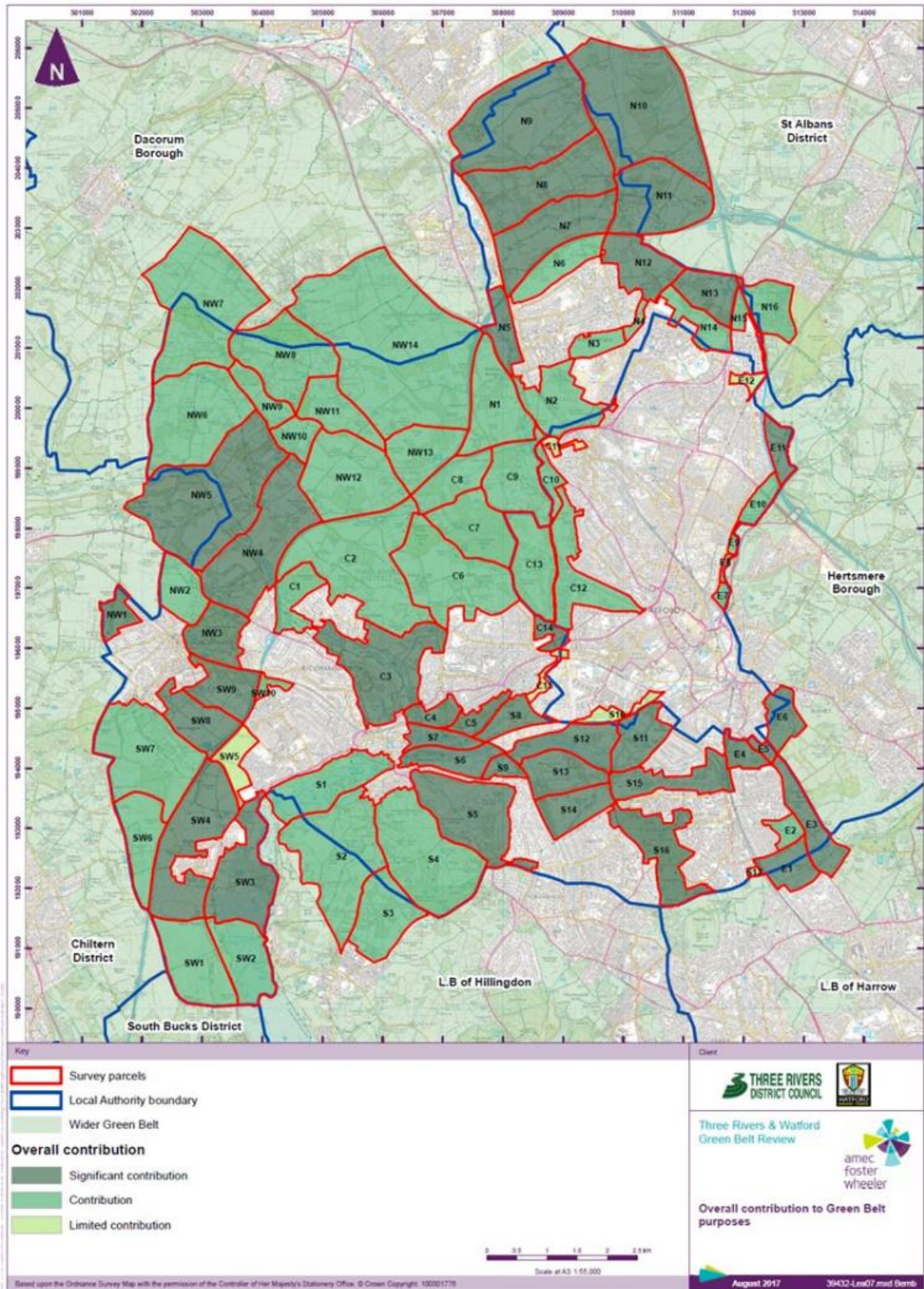
Para 143

*f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

Para 145

*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.*

The assessment below indicates that the proposed Green Belt sites **should not be released** as they still perform strongly in terms of the stated NPPF purposes. The sites around Maple Cross make a significant contribution to those purposes.



## Detailed Comments on the Plan

The housing need calculations are too high and are not based on the latest information. The Government, however, is still in flux as to how to determine housing numbers at a local level. Therefore, TRDC should push back at having to deliver such high numbers based on the large amount of Green Belt in the District, and other sensitive environmental indicators.

It is recognised the Council cannot demonstrate a five-year housing supply. The Local Housing Needs Assessment is for 624 dwellings per year. Most of the need is for small dwellings – either flats or small houses, especially affordable housing. Specialist accommodation for the elderly is also needed as the population ages. This indicates that new housing should be provided in town centres and sustainable locations.

Climate change issues have not been sufficiently explored, despite water scarcity being highlighted as an issue. Ground water protection zones are proposed for development threatening the land's ability to absorb rainwater, and that in turn could affect water quality from pollution.

We see no evidence that the use of brownfield sites – particularly retail and vacant employment sites – has been adequately explored. In the post pandemic world demand for much commercial space will change significantly. Further study work to identify potential capacity for housing is needed before the Plan is finalised.

There is no mention of loss of agricultural land or viability issues if farm holdings are broken up. Agriculture is especially vulnerable in the rural urban fringe, with increased urban threats such as fly-tipping and uncontrolled dogs worrying livestock.

The Vision and Objectives in the plan are vague and focus primarily on housing delivery and employment. Strategic release of the Green Belt is mentioned but should also include reference to the GB as a strategically important designation that should be protected.

Provision of a network of green infrastructure is proposed, but no details are provided on specifically maintaining and enhancing the natural environment or improving access to the countryside and recreational facilities. No mention is made of the Aquadrome or the network of blue infrastructure. Or the CVRP. These are all fundamental features that shape the character of the area.

The Community Strategy makes no mention of the GB as a strategic issue.

Specific policies on promoting and enhancing green infrastructure network are vague in terms of delivery: i.e new development should **contribute** towards green and blue infrastructure. How, precisely, would this be achieved?

Duty to co-operate – the documents refer to consultation, but no neighbouring authorities have offered to help. No evidence is put forward to justify this, yet TRDC is one of a number of local planning authorities in SW Herts that are preparing strategic planning documents in the early stages of preparation. Perhaps it should wait.

The documents do not comply with the requirements of the NPPF in terms of releasing Green Belt. There are only vague promises about encouraging compensatory improvements, and most sites are in areas where there is poor public transport provision. In Maple Cross and Mill End, the land

proposed is close to the M25 giving rise to air pollution, noise and lighting concerns. Placing housing on valley slopes gives rise to negative impact on views and landscape concerns.

### **Impact on the Colne Valley Regional Park**

Sites at Maple Cross (1,500 homes and warehousing) and Batchworth, have the biggest impact in terms of CVRP, landscape and Green Belt purposes. Our comments are therefore based on these sites.

The Sustainability Assessment is supposed to guide and influence the production of the Plan. The quotes from the document below indicate that this is not the case.

### **Land at Lynsters Farm allocated for warehousing**

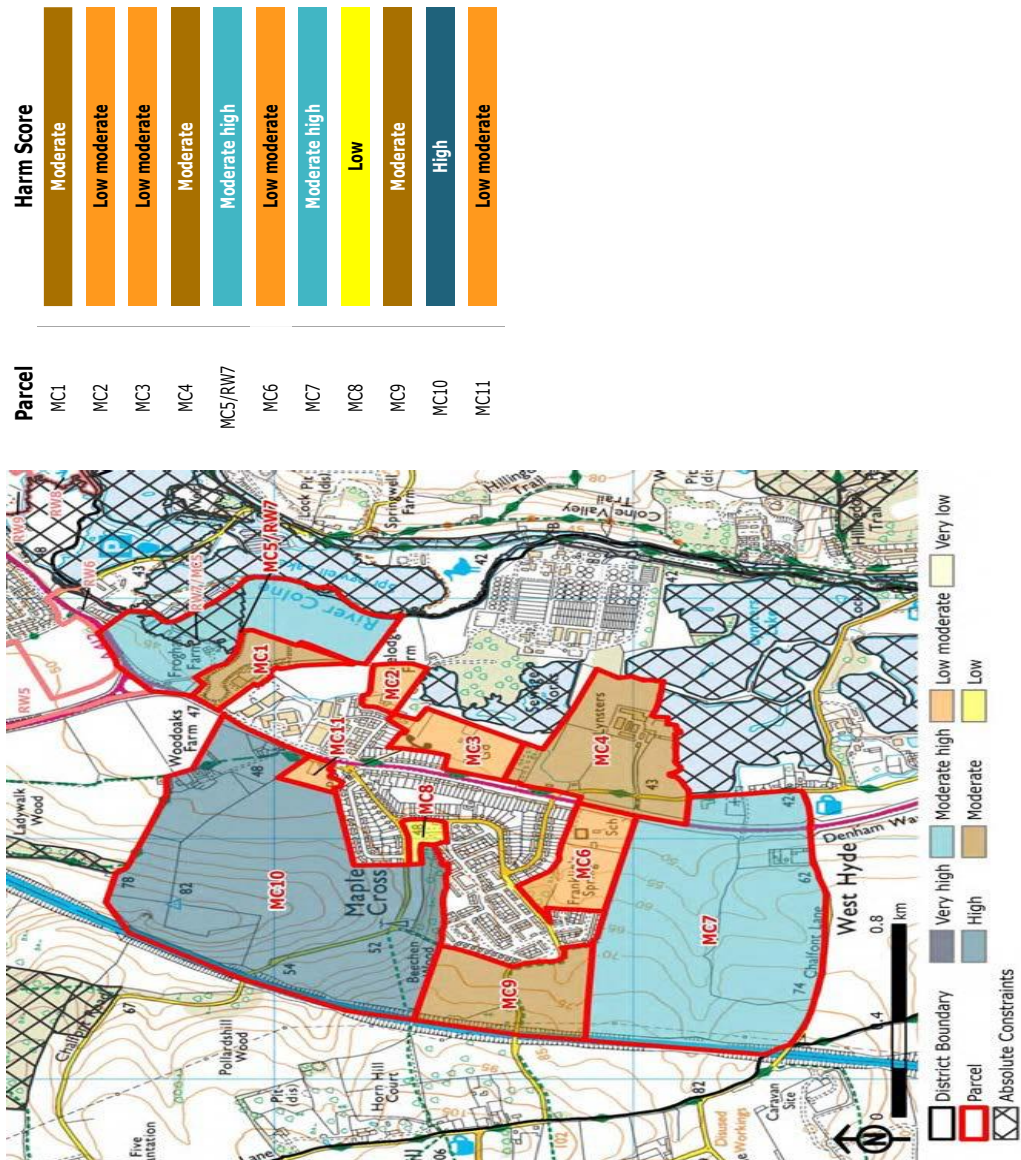
The Sustainability Appraisal states in relation to this allocation.

*The site, which contains a TPO, is considered to be of high ecological sensitivity and is adjacent to a LWS to the south. There is another LWS and an LNR close to the northern boundary (SA1) and development would expand Maple Cross into open countryside (SA9). The majority of the site is in Flood Zone 2 and the southern boundary is adjacent to Flood Zone 3b. The whole site is at high risk of surface water flooding and very high risk of groundwater flooding (SA3). The development would result in the loss of agricultural land (SA6). The site may include heritage assets of archaeological interest. There is a Grade II listed building on the site and development would impact upon its historic agrarian setting (SA8). Though the site is reasonably close to a small number of local services, it is not well served by public transport and cannot be considered a sustainable location (SA4 & SA11).*

*The site is in GSPZ1 which risks contamination to the groundwater source (SA2). The southwestern part of the site was previously a landfill and development could provide an opportunity for remediation of any contamination (SA6). The site's proximity to Maple Lodge Sewage Treatment Works may cause odour which affects the wellbeing of employees (SA10).*

**This clearly indicates that the site is totally unsuitable for the use proposed. The site occupies a key location and performs an important green role in the clear transition from urban to rural. Why has it been allocated?**

## Maple Cross



### Maple Cross Housing sites

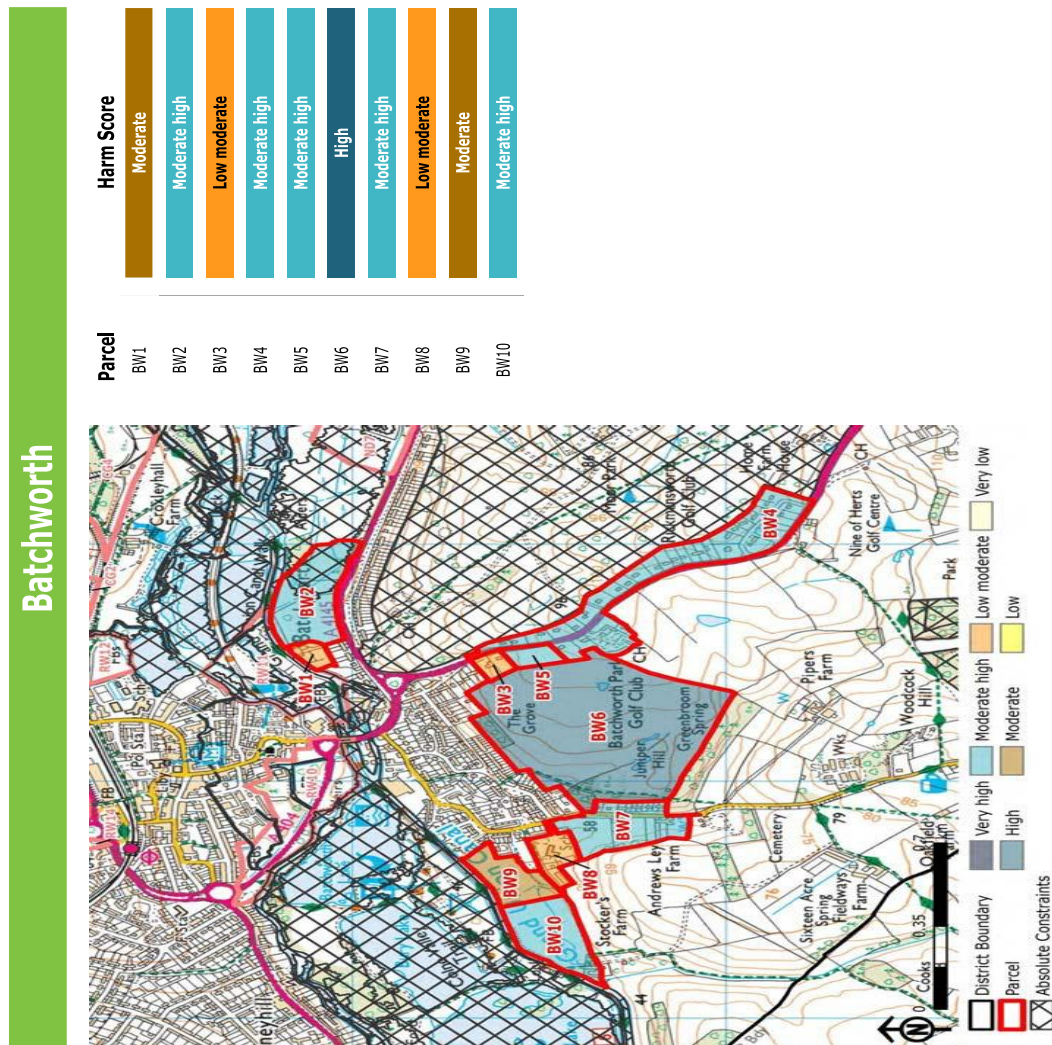
The SA states

*The site is greenfield with some biodiversity value (SA1) and is in use as agricultural land (SA6). Development here would have an adverse effect on the setting of a Grade II Listed Building which is immediately east of the site and the site itself may include heritage assets of archaeological interest (SA8). Development would extend Maple Cross into open countryside in an area with medium-high sensitivity to the built environment (SA9). Though the site is reasonably close to a local shop and primary and secondary school, residents would need to travel to access other services and facilities and the site is not well served by public transport (SA4 & SA11).*

*A majority of the site is in a GSPZ1 (SA2) and small areas of the site are at high risk of surface water flooding due to a surface water flow path running through the site (SA3). A large part of the site is in close proximity to the M25 which could result in air quality and noise issues for residents of new housing (SA5 & SA10).*



These proposed sites for release from the Green Belt and to be allocated for housing are contrary to NPPF policy in terms of their importance to Green Belt policy and their unsustainable location. New boundaries to the Green Belt are unclear and indefensible. In addition, the loss of agricultural land, the impact on the landscape, particularly on the valley slopes, the harm to the abundant biodiversity within the fields, and not least the impact to a large part of the open countryside within the Colne Valley Regional Park. Future residents would also be exposed to noise, light and air pollution from the proximity of the motorway. Local rural roads (including those in Buckinghamshire) are not suitable for the large increase in traffic that would be created by the proposed development.



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Three Rivers and Watford Stage 2 Green Belt Assessment

## Batchworth

The SA states:

*This site is mostly greenfield and contains TPOs to the north and along the north- western boundary (SA1). Development of the golf course would result in loss of greenfield land, although as the site was previously a landfill site development could provide an opportunity for remediation of any contamination (SA6). The development would extend Batchworth into open countryside and disrupt the characteristics of the landscape which is of medium sensitivity to built development (SA9). The development may disrupt the setting of the adjacent Moor Park Registered Park and Garden and*

*there is a Grade II listed building adjacent to the south-east corner (SA8). Development of the site would result in the loss of a community recreation facility (SA12).*

*The northern part of the site is in GSPZ1 which risks contamination to the groundwater source (SA2). Development would disrupt the public right of way which runs across the north-eastern edge and result in the loss of the golf course (SA10). The site is located close to facilities and services and has a reasonably good bus service (SA4 & SA11). The development would include new open space and play space (SA10 & SA12).*

The development would deliver 618 new dwellings (SA13).

The site has not been assessed in landscape terms, but we are in no doubt that it performs very strongly, especially in this edge-of-London and CVRP context. The location on the valley slopes would make any development highly visible from afar, and the views from the existing site would be marred.

In terms of loss of Green Belt the site is of strategic importance separating Rickmansworth from Northwood in the London Borough of Hillingdon. It has been assessed as High in the Green Belt Assessment. This is an indication it performs strongly in terms of the NPPF GB policy.

**It therefore should not be released due to its Green Belt and landscape importance.**

## **Conclusion**

The Green Belt Assessment, the Sustainable Assessment and the Landscape study work – all part of the Council's own evidence base – clearly indicate how unsuitable these proposed sites are for development. They will also cause significant harm to the Colne Valley Regional Park in terms of loss of agricultural land, harm to countryside recreation, and loss of biodiversity. The loss of Green Belt is also clearly contrary to the NPPF policies, and therefore the sites should not be allocated.