

President: Rt.Hon. the Lord Randall of Uxbridge Kt.PC.

FAO:

South West Herts JSP,
c/o Dacorum Borough Council,
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4th November 2022

Dear Sir/ Madam,

Consultation Response on the Joint Strategic Plan, 'Realising our Potential' from the Colne Valley Regional Park

The Colne Valley Regional Park (CVRP) and the Green Belt

1. This response is submitted on behalf of the Colne Valley Regional Park (CVRP). The Park area covers a significant part of the Green Belt (GB) at the southern edge of the Plan area, within Three Rivers District Council (TRDC). However, much of our comment is relevant to wider Green Belt and the network of rivers in the Colne Catchment which is the uniting landscape that ties together all local authorities within SW Herts. More information about the CVRP is included in Annex 1, save to say that the designation and organisation exists to foster the protection and enhancement of the area as a countryside resource for the long term.

Headline Comment

2. The **intention to create a strategic planning framework to coordinate approaches by the individual Local Authorities (LAs) is very much welcomed.**
3. As the Green Belt (GB) is such a significant factor affecting planning for this area **we ask for the Joint Plan to give more consideration to the Green Belt** on the edge of the capital and urban centres in SW Hertfordshire.
4. We agree that individual decisions about development in the GB should be left to the Local Plans but **this Joint Plan should draw out the strategic role and value of the GB more** - not just for its function to prevent urban sprawl and keeping the GB permanently open, but also in its role offering communities access to a quality and biodiverse natural environment. In so doing this supports:
 - healthier lifestyles
 - better physical and mental health
 - greater biodiversity
 - better connectivity for people & wildlife to the natural environment they depend on
 - combatting climate change
 - a thriving network of farms to underpin these positive aspects
5. This role often does not always exist now - but **highlighting the potential of the GB in this regard should be an important part of the Joint Plan.**

Colne Valley Park Trust

Charity Registration Number: 1181303

Colne Valley Park Community Interest Company

A company limited by guarantee. Registered in England. Company No. 08131867

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Views of the community about the Green Belt and countryside/ natural environment

6. We note that the results of the 2020 public engagement survey revealed that ‘parks and open spaces’ was most valued thing about the SW Herts area and, specifically in relation to the TRDC area, ‘pleasant environment and possible improvements’ and ‘access to the countryside’ were highlighted.

7. In the supporting appendices to the 2020 engagement report it states:

“Greenery was considered as one of SW Hertfordshire’s key assets. The area’s pleasant environment was frequently noted as offering a moment of calm and the offer of the facilities of an urban centre alongside countryside and nature was viewed positively.” (p.38 of the 2020 Engagement Survey Report) and under ‘Green Spaces’ on p.50 of the 2020 report it states: “A need to protect green belt land was by far the most frequent response.”

8. This strong piece of feedback from the public is consistent with national planning policy and **the Joint Plan should include more about the positive planning and improvement of the GB as an underpinning part of the Joint Plan.**

National planning policy for the Green Belt

9. GB is a strategic policy and, whilst the essential characteristics of GBs are their openness and their permanence, another part of government policy that is very relevant to the planning of this area at a strategic level is set out in the National Planning Policy Framework (NPPF) at para 145:

*“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.**”*

10. The objectives for the CVRP (contained in Annex 1) align very closely with the ‘positive planning’ role for the GB that local planning authorities are called on to perform. Because establishing the right framework for the GB is such an important aspect of strategic planning for SW Herts, **we ask that the Joint Plan brings out this positive role more fully.** The Joint Plan should also highlight that **the CVRP welcomes a partnership approach with local authorities** (LAs) to improvement of the GB within the Park area.

The 2019 Colne and Crane Green Infrastructure Strategy (C&C GI Strategy)

11. The 2019 C&C GI Strategy was commissioned to provide a framework for and approach to the future planning and improvement of the area. It highlights some opportunities that should be seized and projects that could help realise the area’s potential.
12. This is a link to the Strategy: <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>
13. **This helpful framework can be better referenced in the Joint Plan and provide a template for local planning policy.**

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14. The Joint Plan should encourage LAs to work up a GI Strategy for the GB in their area and (in relation to TRDC) to partner with the CVRP to that end. In so doing the LAs can address the requirements of NPPF para 145.
15. Furthermore, in the event of the release of land from the GB being proved necessary, such a GI strategy can provide the framework for compensatory improvements to the “environmental quality and accessibility of remaining Green Belt land”, as called for in NPPF Para 142. The Joint Plan should promote such an approach.

Some Other Specific Comments on the draft Joint Plan

16. Introduction (p.4 and 5): Where the introduction states what the ‘collective ambition’ is for working together it is conspicuous that reference to protecting and improving the GB (that we know local people want to see) is absent - please add.
17. Our Environment (p.10 and 11): We welcome reference to the CVRP as one of the area’s important landscapes. We ask that under ‘Access to Green Space’ specific reference is made to the role and potential of the GB.
18. Playing (p.16 & 17): Whilst we recognise the importance of the things already mentioned we suggest that this title is broadened to embrace people getting out into the natural environment (including but not limited to cycling). Might leisure and recreation be more appropriate?
19. Moving (p.18 & 19): Again, we recognise the importance of the things already mentioned, but ask that walking connections are included alongside cycling.
20. Planning for Infrastructure (p.20): We welcome that the Joint Plan will be supported by a longer-term delivery plan setting out what types of infrastructure are needed. This can embrace the GI Strategy we refer to in our paras 14 and 15 above.
21. Vision (p.22): This vision is too growth/development focussed. Consistent with the public’s views (see our para 6-8 above) the vision must draw out that SW Herts will be ‘known for’ the high quality and accessibility of its green and blue environment.
22. Moving Easily in Connected Places (p.27): The theme ‘connect towns and villages’ should be widened to refer to the countryside and/ or natural environment.
23. Shaping the future (p.30 & 31): Pillar A on p.31 misses a key point that there is much more to this than just creating ‘new’ green space and it should embrace enhancing what we already have e.g., the CVRP and its rivers. Achieving multi-functional use of our landscapes deliver multiple benefits. This type of landscape scale (and catchment scale) approach should be exactly what the SW Herts plan is aiming to do through working together across administrative boundaries. In this respect we highlight:
 - The need to reflect the importance of the water environment - specific reference should be made to rivers/the water environment in pillar 1 (living green in a healthy natural environment). This unites the 5 LAs, with most of the area falling within the Colne Catchment - see map at <http://www.colnecan.org.uk/>¹.

¹ This link also includes a brief outline of ‘ColneCAN’ (Colne Catchment Action Network) including the vision and 6 aims

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- **Chalk Streams are an internationally-rare habitat** with over 80% of the world's chalk streams being in England. All the rivers in the Colne catchment are chalk streams flowing into the River Colne, a distinctive feature of SW Herts. Their preservation is under threat from abstraction of water from aquifers, phosphates run off (mentioned in the ES) and sewage outfalls caused by an inadequate infrastructure built for a much smaller population.
 - **The Joint Plan should recognise the water challenges that SW Herts faces.** It is a water stressed area with a shortage of water and with public water supply coming from the same places that feed the rivers (the aquifers). The Colne, Ver, Gade etc all suffer from extreme low flows and drying up for large parts of their natural courses. Herts has the highest water consumption in the UK, 8% above the national average – see <https://www.hertfordshire.gov.uk/microsites/building-futures/a-sustainable-design-toolkit/technical-modules/water/water.aspx> including the 'water facts' link.
 - **The Joint Plan should flag that development strategies need to be informed by these water challenges** – e.g. water efficient design, use of Sustainable Urban Drainage Systems (SUDS), consideration of the capacity of water treatment/ sewage. Specific policies in local plans are needed relating to this.
 - We also draw attention to a the planning policy recommendation regarding development near watercourses included in Appendix 2 to the 2019 C&C GI Strategy: <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>
24. Shaping the Future (p.32 & 33): Whilst we understand the different approaches to (built development) growth **this section misses the key challenge around shaping the future by improving the natural environment and access to it – this needs to be set out** as one of the discrete aspects of Shaping the Future.

Conclusion

25. We hope these comments on the emerging plan are helpful and look forward to the Joint Plan making stronger references to the Green Belt's important role and potential as a critical area of natural environment. The Colne Valley Regional Park is a key section of that Green Belt and it will greatly benefit from a positive strategic planning framework.
26. If you have any queries on our comments we will be happy to participate in further discussion or a meeting, if needed.

Yours sincerely

Jerry

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For and on behalf of the Colne Valley Regional Park

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Annex 1

About The Colne Valley Regional Park

1. The Colne Valley Regional Park (CVRP) 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.
2. It is championed by the Colne Valley Park Community Interest Company (CVPCIC).
3. 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.
4. The Park's six objectives align with national planning policy (NPPF para 145).

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