

Three Rivers Nature Recovery Strategy
Comments submitted by Groundwork South

January 2023

These comments are made with reference to the Colne Valley Regional Park and Colne Catchment Action Network (ColneCAN)

Summary:

We welcome the Council's broad commitment to nature but wish to see the document refer more strongly to TRDC's place within the wider landscape of the Colne Catchment. We would like to see the 'action plan' section made more specific with more reference to opportunities to work together with existing landscape-scale partnerships including the Colne Valley Regional Park and the Colne Catchment Action Network.

Comment on specific sections.

Biodiversity in Three Rivers:

After paragraphs 18-21 add a new para: "Many of these SSSI's, LNR's or County Wildlife Sites are located within the Colne Valley. However this important habitat should be viewed, protected and managed as a wider entity across multiple Local Planning Authorities (from Watford, through Three Rivers to Buckinghamshire, Hillingdon and beyond) rather than the current situation of a series of small, isolated SSSI's or Nature Reserves. This is in line with the Lawton principles, of 'bigger, better, more joined up' from the government's 2011 Natural Environment White Paper. TRDC is ideally placed to play a key role in this sitting as it does as the 'northern gateway' to the Colne Valley Regional Park and being located right in the centre of the 1000km² Colne Catchment. There are over 10 local planning authorities that cover parts of the Colne Catchment but TRDC is the only local authority that is entirely located within the Colne Catchment"

(as an alternative you may feel that this new paragraph might fit better under the 'Rivers & Wetlands' section.)

Legislation:

It is important that the Nature Recovery Strategy is part of a multi-functional natural environment/Green Infrastructure improvement strategy that focusses on connections through TRDC area on a catchment/landscape scale. This should reflect the way that nature (and people) use the landscape.

The legislation section should be complemented by National Government Guidance. Reference should be made to National Planning Policy Framework Para 145 and the Council's broad

responsibility to plan for enhancement of the Green Belt's beneficial use. I quote (our highlighting): **"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 Nature Recovery Strategy should help TRDC to meet your obligations under NPPF.

Rivers & Wetlands (and the river valley environment):

The section title headed 'Rivers & Wetlands' should be broadened to 'Rivers, Wetlands and the River Valley Environment' to make it clear we are looking at a catchment-scale approach to how biodiversity is connected.

The Nature Recovery Strategy should link across to the need for a Green Infrastructure 'improvement plan' that can provide a 'natural environment' framework for planning decisions. This can be informed by the 2019 Colne & Crane Valley's Green Infrastructure Strategy (see <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>) which we have started discussions with the Council's planning team about integrating this into the Council's planning strategy.

Para 38. Should specifically state "Colne Valley Regional Park" rather than just "a Regional Park". Also please state that: "This Regional Park was created in the mid 1960's by local authorities including TRDC's predecessor organisation, Rickmansworth Urban District Council, which was one of the founding members." Add the following weblink to this paragraph: <https://www.colnevalleypark.org.uk/>

Add new paragraph about the Colne Catchment Action Network. A catchment-wide partnership whose vision is "The Colne Catchment is a place where people are working together to protect and improve the water environment for everyone...." Include reference to the online action plan which can be accessed by clicking on the map on the home page. Add the weblink: www.colnecan.org.uk

The Action Plan

Action 9: We welcome the Council's intention to engage with the Colne Valley Regional Park and Colne Catchment Action Network but the way this action is currently worded is too unambitious and far too vague. Change "Consider greater involvement with..." to "Actively support and engage with..."

Under the 'legislation' (or 'wetlands') category add the following action: "Work with or support partner organisations to gather evidence and make the case for further protective designation for the rivers and associated wetland habitats in the Colne Valley." This is connected to our paragraph on page 1 of this document in response to the 'biodiversity in three rivers' section.

Under Wetlands category add new action: "Ensure that Three Rivers District Council plays its part in development, and subsequent delivery, of a catchment-scale 'rewilding' plan to ensure the Colne,

its tributaries and wetland habitats in the valley floor are wilder, more joined up and have improved biodiversity value on a catchment scale”

Under Wetlands category add new action: “Explore and implement natural flood management within Three Rivers District to help implement the Colne Catchment Action Plan”

Under Wetlands category add new action: “Support the work of ColneCAN, Colne Valley Regional Park, Groundwork South, Colne Valley Fisheries Consultative and others on tackling Invasive species on a catchment scale – including biological and physical control measures to tackle Floating Pennywort”

Under countryside category add new action “Informed by historical maps and Landscape Character Assessments explore opportunities for hedgerow and woodland replanting”

Under countryside category, add new action: “Contribute to the development of the ‘M25 habitat corridor’ proposals, currently being led by Arup and Groundwork South”