

Batchworth Neighbourhood Plan Consultation – July 2023

Response from the Colne Valley Regional Park Trust



Context and Introduction

The Colne Valley Regional Park covers 43 square miles, spanning from Rickmansworth in the north to Staines in the south. It offers the first taste of countryside to the west of London. The Regional Park aims to ensure multi-functional use of land in line with the six objectives of the Park, 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.

A trust (registered charity) oversees the CVRP. The CVRP Trust looks forward to collaborating with Batchworth Community Council to identify and, where resources allow, implement ways to enhance the environment and accessibility (by non-motorised modes) of the Park. Initiatives are geared to ensure that the Park offers an improved wildlife, recreational and educational resource for local communities, in line with the 6 objectives outlined above. This is a resource for the long-term, the land in the Park is invariably Green Belt that needs to be cherished for its natural environment as once lost to development it is lost forever.

Comments on content of the Plan

General

We welcome the draft Neighbourhood Plan (NP) and our comments are submitted with the view to improving its effectiveness in protecting and enhancing the area's green and blue infrastructure which is such an important asset of strategic value.

We restrict our comments to those issues that relate to the CVRP's 6 objectives.

One aspect omitted from the NP is of concern. The NP appears to be silent on the issue of housing and other planning/ land allocations, noting that the emerging TRDC Local Plan will contain such allocations. The CVRP Trust considers that the opportunity should be taken for the NP to take a stronger role in influencing and shaping that emerging Local Plan, which is yet to reach an advanced stage.

As well as drawing out the Green Infrastructure Corridors (shown in Fig 15) the NP should draw out the strategic role, in Green Belt and general landscape setting terms, of open land on the valley sides.

There were some draft allocations in the 2021 TRDC 'preferred options' consultation plan which the CVRP Trust considers would conflict with the intentions of Green Belt designation and which would be damaging to the character and amenity of the CVRP and the contribution it makes to the Batchworth area.

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We provide, separately, the CVRP response to the 2021 TRDC consultation and we highlight our concern about the damaging impact of the (then) proposed large scale development on the attractive and important valley side at Batchworth Golf Club. We trust that the Batchworth Community Council supports our concern and will strengthen the content of the draft NP to make clear that the open and unbuilt Colne valley sides are an important part of the landscape character of Batchworth (alongside the Colne, valley floor, corridor) and a key part of the strategic gap between London/ Northwood and Rickmansworth/ surrounding settlements.

Section 2 (Batchworth Today)

River Valley (2.37-2.40): The Colne Valley Regional Park (CVRP) should be referenced in this section.

Para 2.46: The reference to a further round of development plan consultation in early 2023 is out of date.

Section 3 (Batchworth tomorrow)

‘Vision’ (3.1): We support what is included in the proposed Vision but ask that the wording is enhanced to include reference to the Green Belt. This should refer to it being cherished for the strategic role it performs in preventing urban sprawl by keeping land permanently open. See our comments above under ‘General’.

Section 4 (Green and Blue Infrastructure)

General comment: We support the identification of key green corridors (Fig 15) but it is notable that there is no discussion of the Green Belt and its strategic ‘green’ role. NPPF para 145 calls on local planning authorities to plan positively to enhance the beneficial use of Green Belts. We ask that this aspect links in with the helpful policies and ‘projects’ (in blue boxes) that the draft NP brings forward. The NP should grasp the opportunity to input to what the local authority should be bringing forward.

Colne Valley (4.13 onwards):

Para 4.14: Whilst it is relevant to highlight the ‘North Colne’ actions and opportunities it is also important to make reference to the ‘Whole Area schedule of opportunities’ which are very relevant.

Policy BW GB2 (CVRP): We welcome inclusion of a CVRP policy and suggest some additions to it and for the policy to be complemented by inclusion of a ‘blue box’. This could be similar to the content of Project BW Gb(a) and we will be pleased to work with you on the wording. It can refer to working in partnership with the CVRP Trust to improve the natural environment in the CVRP and public access to it through projects.

In terms of additions to the policy we are concerned that some elements of the ‘model’ policies included in Appendix 2 to the 2019 GI Strategy have been omitted, in particular with reference to:

- the Park’s six objectives
- community participation
- legally binding provision for long term management and maintenance
- the section on development close to watercourses (though we recognise some overlap with other policies in your draft NP)

We will be pleased to work with you on the wording. You may want to consider the CVRP policies included within the ‘made’ Denham Neighbourhood Plan (Policy DEN7: Colne Valley Regional Park, parts A and B and Ivers NP (Policy IV13: Colne Valley Regional Park, parts A &B).

Local Green Space Designations (4.25 onwards): We support the proposed designations within the CVRP.

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Policy BW CC2: We support the thrust of the policy but ask that the wording of sub-section 3) is changed insert a word as follows: *“Proposals for energy generation from the river and canal network will be subject to assessment of potential impacts **including** on flood risk, water levels, navigation and wetland wildlife. Consultation with and the gaining of any necessary licences or permits from the Environment Agency will be required.”* This covers the eventuality that there may be other impacts that need to be taken into account.

Section 7 (Design)

We support the intentions and provisions of this section, with one small request – to insert the text in red in the relevant policies:

Policy BW DE1 (High Quality Design): In sub-section f) we suggest that you add in the text in red: “f) Incorporate a well connected and legible network of streets that aids safe walking and cycling **and, as far as possible, access to allow enjoyment of the natural environment in the locality.**”

Alternatively there could be cross-referencing (perhaps in the supporting text) to Policy BW GB3: Access to green and blue infrastructure.

Section 8 (Access and movement)

We support the intentions and provisions of this section, with one small request – to insert the text in red in Policy BW AM1 (Active and Healthy Travel): “b) Demonstrate how such proposals will integrate satisfactorily into existing adjacent walking and cycling networks, without reduction of capacity or safety of those routes **and, as far as possible, provides access to allow enjoyment of the natural environment in the locality.**”

Alternatively there could be cross-referencing (perhaps in the supporting text) to Policy BW GB3: Access to green and blue infrastructure.