

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

Three Rivers District Council

By email

December 2023



**Local Plan Regulation 18 consultation Part 4:
Three Rivers' Preferred Local Plan Lower Housing Growth
Option - Protecting More Green Belt Land**

This response is made on behalf of the Colne Valley Regional Park (CVRP).

In Summary.

We note that this consultation is only for housing allocations. The only sites that affect the CVRP are those at Maple Cross. However, these sites make up the largest allocation and will have a significant impact on the Regional Park in terms of increased access to the countryside in an area described in the SW Herts SA strategy as being an essential part of the SW Herts GI network and a regional park which is poorly served by transport links. This description applies to the part of the Park in Hertfordshire.

The Colne Valley Regional Park was founded in 1965 when local authorities – including Bucks County Council – showed great foresight in agreeing to work together to preserve and enhance this precious area for recreation and nature conservation.

It is supported by more than 80 member organisations including local authorities, businesses, residents' associations, environmental charities and user groups. Groundwork South acts as the 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 six local planning authorities. As a result, the valley is rarely, if ever, considered at a landscape scale.

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

Registered Office: c/o Colne Valley Park Visitor Centre, Denham Court Drive, Denham,
Buckinghamshire, UB9 5PG
www.colnevalleypark.org.uk

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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.

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

Protecting Nature

The CVRP has many individual sites that are protected including part of a Special Protection Area, 13 SSSIs, one National Nature Reserve, seven local nature reserves; more than 40 ancient woodlands; multiple county wildlife sites and biodiversity opportunity areas. The Park forms a wildlife corridor of hundreds of kilometres of rivers, more than 70 lakes and associated habitats on the floor and sides of the valley.

The Park should be looked at as a whole and not in terms of individual local authority areas – its connectivity for wildlife is its essential feature. The lakes in the northern half of the Regional Park are of proven national significance for wildlife.

Proposals

Maple Cross – proposals for 850 new homes will substantially increase the existing settlement. It is recognised that this is less than previously proposed, but it will still have a negative impact on the CVRP. This impact does not appear to have been fully assessed in the SA. This substantial increase in the population will put greater pressure on the need for access to Green space and encourage more vehicle use because public transport is very poor. In turn this will lead to poorer air quality. The landscape of the Colne Valley sides will also be damaged forever. This is apparent in how visible and detracting the HS2 works are, which are already on the valley sides.

National Planning Policy

Para 142 states that

Where it has been concluded that it is necessary to release GB land for development, plans should give first consideration to land that 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 GB can be offset through compensatory improvements to the environmental quality and accessibility of remaining GB land.

See also para 145 for the requirement for LPAs to plan positively to enhance the GB to provide opportunities for outdoor sport and recreation to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land.

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Comment – Maple Cross is one of the least sustainable settlements in TRDC being heavily reliant on the private car and infrequent buses. There is no evidence that the required work to justify the GB release in terms of compensatory improvements as per para 142 has been carried out. This is the only allocated site which will have such a negative impact on protected sites within the CVRP.

Mitigation Requirements

Mitigation for loss of Green Belt this does not appear to have yet been considered, even though it is a requirement of the NPPF.

The National Cycle Network route runs through the heart of the CVRP – there need to be connections and improvements to this route from Maple Cross.

The green and blue infrastructure networks can be used for walking, cycling and biodiversity if the relevant investment is secured through this development, without any harm caused to the local biodiversity or impact on the chalk streams.

Indeed, the draft policy on Biodiversity, Trees, Woodlands and Landscaping (all relevant to the CVRP) does not mention the CVRP at all but states in point 3) development that would affect a SSSI, LNR or LWS or protected species will not be permitted. This allocation will have a negative impact on the nearby LWS in the CVRP, without significant mitigation. Point 4) refers to the Mid Colne Valley as being a key area for biodiversity.

Conclusion

We ask you to reconsider the size of this allocation in Maple Cross.

Provide significant mitigation for the CVRP in line with the six objectives of the Park

Provide a dedicated policy within the Local Plan that protects the CVRP. We can provide text which has been used in other local authorities within the Regional Park.

Jane Griffin RTP1
Trustee
Colne Valley Regional Park

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