

Hillingdon Local Plan Consultation: Call for Views

Response from Colne Valley Regional Park Trust

June 2024

1. Context/Strategic importance of the Colne Valley Regional Park for Hillingdon

The Colne Valley Regional Park (CVRP) is the first large taste of countryside to the west of London covering 43 square miles across parts of Hillingdon and five neighbouring Local Authorities. The CVRP lies in the Green Belt and needs to be seen as an important natural environment resource. The objectives of the Park (see <https://www.colnevalleypark.org.uk/whats-special/>) are focused on multi-functional use of the Green Belt for public benefit.

The CVRP covers 16% of the borough and has considerable potential for further improvement as an asset for Hillingdon, providing ready access to countryside and nature – with all the proven health and wellbeing benefits that brings to residents and workers.

Our response to this consultation is focused on helping Hillingdon deliver requirements from NPPF para 150 to ‘plan positively’ for the Green Belt within its care: *“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 CVRP (within and outside the Borough) is a crucially important countryside and waterways resource right on the edge of your urban area, the very place where this resource is most needed to deliver public benefit to millions of people, yet it is also the point of greatest pressure from inappropriate development.

The Local Plan should be an important spatial expression of the Council’s corporate approach, and its aspirations for a ‘green and sustainable borough’. It is a document that will provide a framework for other corporate policy and actions across the whole council including its teams working on green spaces, estates and property, rights of way, active travel/cycling, enforcement etc (where that work relates to planning).

2. What we want to see within the Local Plan

As stated in the NPPF, it is not appropriate for the Council to allocate land for most forms of development in the Green Belt unless it sees ‘exceptional circumstances’.

Because of the importance of the CVRP and opportunities to realise its potential for public benefit, we do not see that there is a case for exceptional circumstances to permit development within it, unless that development is geared to enhancing the countryside and how it functions.

However, if the Council believes there might be site allocations in the Park, we request that we are given the opportunity to discuss potential impact and how it can best be mitigated and complemented by compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as part of the considerations for the identified sites.

The 2019 Colne & Crane Valley's Green Infrastructure Strategy () should be referred to within the Local Plan. The GI Strategy gives a starting point and clear direction of travel for the Council. We welcome discussions on how this can be interpreted and developed within the local plan and associated strategies, development briefs and other council documents that flow from or are linked to the Local Plan.

3. Colne Valley Regional Park policy

Whilst most development in the CVRP would fall into the fundamentally 'inappropriate' category there will be other types that could contribute to enhancement of the Park as a resource. We would welcome discussion around this in advance of a full draft Plan, but a catch all along the following lines could be incorporated into a Colne Valley Regional Park policy to ensure that any development is in line with the Park's objectives:

"Development that is fundamentally aimed at improving the environment, biodiversity and countryside landscape of the Colne Valley Regional Park, and public access to it, would be supported"

Examples of development, access and land use change that could make a positive contribution to achieving the six objectives of the CVRP and provide positive benefit to Hillingdon residents include:

- Countryside visitor and interpretation centres.
- Countryside Recreation Facilities – that do not harm statutory nature conservation sites and that can co-exist with other site uses in line with the CVRP objectives e.g. angling, walking, nature study and farming.
- Farming and woodland management (for biodiversity, public access and food production).

Types of development that should be resisted would be those that conflict with the CVRP objectives, and any development with a size or scale that is not in keeping with a countryside setting, including visual impact and loss of openness of the Green Belt, both as perceived from paths and roads next to the development and from far-reaching viewpoints (e.g. Uxbridge Common) from which the countryside setting of the urban areas will be diminished. This is in line with NPPF para 142: *"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

The Model planning policy in Appendix 2 of the Colne & Crane Valleys Green Infrastructure Strategy can provide a means to ensure mitigation for public benefit from any development that takes place in and around the CVRP.

4. Specific comments on the sections from the consultation

In addition to the above general comments and call for a specific CVRP policy, we make the following comment on the sections of the Council's consultation.

Objectives and vision:

- We support the Council's existing approach to take full advantage of its distinctive strengths. The CVRP should be listed in the Plan as a key strength that Hillingdon has at its disposal by which to deliver benefit to its residents relating to delivering the following commitments to

residents from the Council Strategy: “thriving healthy households” and “a green and sustainable borough.”

Growth and Spatial Strategy:

- The CVRP should be mentioned in bullet point two in the key challenges section.
- We agree that “managing the impacts arising from Heathrow Airport” is a huge challenge. Threats to the CVRP from the airport include landscape dereliction, landscape quality decline and failure to properly integrate mitigation of previous expansion into the landscape. The countryside around Heathrow should be a selling point for the country and the first taste for international visitors of “England’s green and pleasant land”, but currently its condition is so poor that it is a national disgrace. However, if government permits expansion, we point to the huge impact to come, particularly in Hillingdon. We welcome discussion around policy in the Local Plan that could a) encourage landscape restoration of the countryside around the airport as it currently stands and b) in the event of expansion, as previously suggested, reduction of the colossal environmental impact of the proposals in land in the Council’s area. e.g. reduced length and numbers of rivers culverted under runway and significant mitigation to counter it.

Housing:

- Key challenges – bullet point 5: CVRP should also be listed as a ‘significant constraint’. Any housing built in the CVRP will reduce the potential of the Park to serve a purpose for existing and new householders.
- We consider that the countryside within the CVRP has an important ‘health and well-being’ role for future housing development’s residents within the urban area. Policy should recognise this and see high quality countryside as part of the future community’s infrastructure. We welcome discussion around how policy could respond to this*.

Social Infrastructure:

- Key challenges: In addition to bullet point 6, there should be acknowledgement of the need in the CVRP to restore and maintain the landscape setting of parks and open spaces, the path connections between them, and the access to the countryside from residential areas.
- The Local Plan will need to include provision of new open spaces in major developments; it should also enable improvement and maintenance of the CVRP landscape, footpaths and connections to it near to major development*

Economy:

- The Local Plan could address bullet point 3 ‘data centres and other unique uses’ by adding that the impact on the CVRP and Green Belt should be considered in design, location and mitigation.

Green Infrastructure and the natural environment:

- This section is the natural ‘home’ for the CVRP policy requested in section 3 above.

- Key Challenges: Bullet point 4. Add mental health (in relation to proven benefits that access to green space brings).
- Add new key challenge: Landscape decline and poor access connectivity in the wider countryside outside of nature reserves and green spaces. Some areas (e.g. Yiewsley and West Drayton) are close to the CVRP but the landscape and paths from urban to rural areas are of poor quality and are unattractive. This is a significant barrier to people accessing the countryside on their doorstep – despite the routes being ‘accessible’ in theory.*
- The Local Plan should: bullet point 1: As well as seeking provision of GI from development it should provide a means for the plan and other connected council strategy to improve and maintain existing GI of the CVRP*
- There should be a policy in the Local Plan relating to development near watercourses. The Council should review the policy in the current Local Plan in the light of the recommendations in Appendix 2 of the Colne & Crane Valleys GI Strategy. For example; addition of contributions to improve watercourses – e.g making a contribution to tackling invasive species.
- There should be a policy in the local plan that to protect and maintain the attractive, far reaching viewpoints near Harefield. These are some of the best views in London and Hillingdon residents are fortunately to have these on their doorstep. Examples include views from the Old Orchard pub, footpath U22, Coppermill Down/Park Lane and Springwell Lane. Development within these views should be resisted.

*We have made comment about the quality and accessibility of the countryside on the edge of urban areas in the ‘housing’ ‘social infrastructure’ and ‘green infrastructure and natural environment’ sections as it is relevant to all three. The Council should make a judgement call on which one of these three headings will be the most appropriate location for a policy. We would welcome discussion with the Council about how the Local Plan can play its part in addressing this e.g. contributions from development to improve landscape quality and path connectivity for the benefit of future residents of new developments and current residents.

5. Call for Open Spaces evidence

The Colne Valley Regional Park should be included on the open spaces evidence base framework map. The Park is a strategic cross-boundary landscape of regional significance, it includes all the types of open spaces listed on the key of the current map.