



**Statement for the GLA from the Colne Valley Regional Park Trust (CVRP) as response to May 2025
'Towards a new London Plan' consultation**

Preamble and structure of this response

This response is submitted on behalf of the Colne Valley Regional Park Trust (CVRP) by Jerry Unsworth. I am a chartered town planner assisting (part-time) the CVRP.

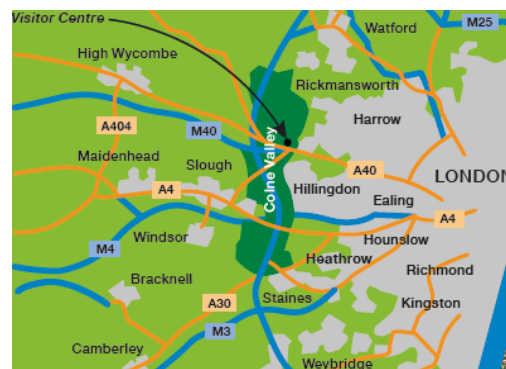
Over the last 12 years I have been supporting the CVRP on mitigation for major infrastructure projects (namely HS2 and proposed Heathrow third runway expansion) and on various other strategic development issues. This includes liaising with the various local planning authorities. My experience over the last decade, since the demise of regional planning, has highlighted the importance of a carefully considered, and strategic, approach to policy for London's Green Belt, especially it's inner part that adjoins the urban area.

We note that the consultation has a focus on different needs for development, where that could happen but also considers quality of life issues, including access to open space and nature. Looking to the future access to open space and nature will be a significant issue for the GLA and there is an opportunity for our organisations to work together to deliver benefit for millions of Londoners.

This early consultation on the shape of the Plan for London is very welcome.

We structure our response under five headings. Our first section provides a little background on the CVRP, and we then consider key questions we ask the Plan to address, namely:

- What does **the CVRP represent as a natural environment resource** to contribute to the future improvement of London's environment and green spaces?
- What **key approaches are needed to the planning** of the Green Belt and Grey Belt to get the best out of the CVRP for London?
- What is the connection between **the shape of the London Plan and how the Green Belt is reviewed and strategic planning**?
- What **evidence** does the CVRP submit now and **next steps**?



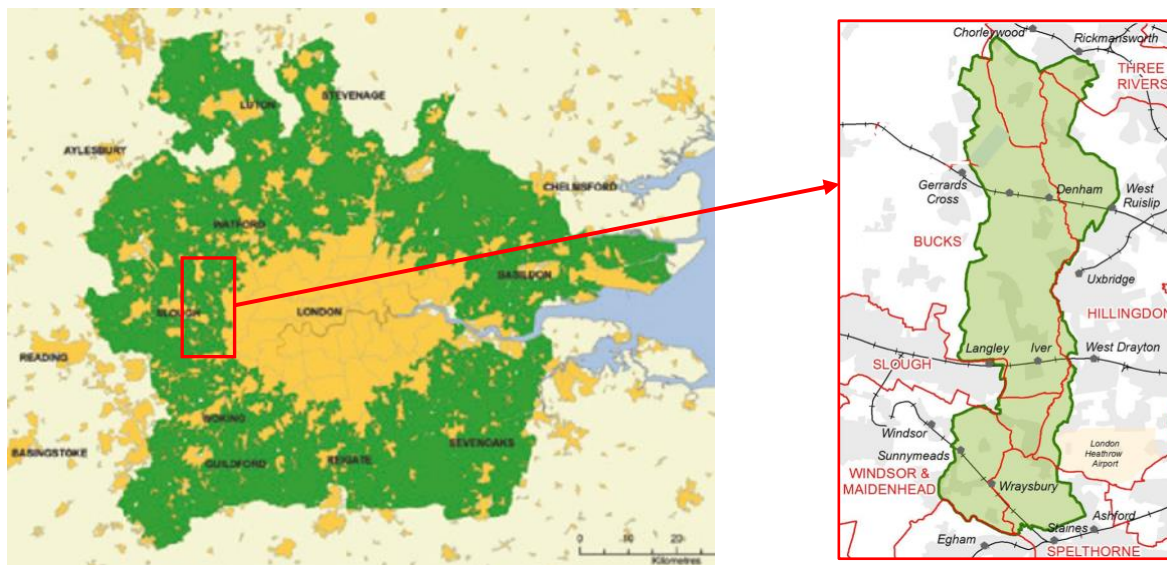
A. The CVRP

- 1) The CVRP is the first substantial taste of countryside to the west of London. It covers over 110,000 hectares between Rickmansworth in the north to Staines/the Thames in the south. It adjoins the western side of the capital and crosses the boundaries of nine local authorities. The Regional Park features a network of 200km of rivers, more than 70 lakes and associated wetland habitats and paths on the valley floor at the edge of London, Herts, Bucks, Berks and Surrey.
- 2) The Park was founded in 1965 by a consortium of local authorities to co-ordinate and promote the improvement of the Park in line with objectives that remain aligned with national planning policy. It is now run as a charitable trust with the objective of improving its countryside on the western edge of London for the lasting benefit of people and nature.



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- 3) The CVRP occupies a key 'inner' part of that Green Belt, and we have significant experience of how Green Belt policy has worked (or not) over recent decades. The red box on this map of the Green Belt shows the approximate location of the CVRP and the narrowness of the GB here, between large urban areas (notably between Heathrow/ Uxbridge/ West Drayton and Slough). Whilst most of its area lies outside the GLA boundary a significant part, in the LB of Hillingdon, is within it.



- 4) The CVRP Trust (registered charity) oversees the Park, with day-to-day operations managed through a contract with Groundwork South, a not-for-profit company operating in the environmental sector. The CVRP runs on a small core budget but levers in major funding for countryside improvements e.g. from the National Lottery. This is estimated to represent £10 for every £1 invested in or contributed to the Trust's core budget. Projects aim to achieve lasting improvements 'on the ground' and examples of our projects can be seen here: <https://www.colnevalleypark.org.uk/whatwedo/>
- 5) The work of the CVRP's small team is guided by the organisation's 6 [objectives](#) (repeated below) and focuses on delivery. These objectives are consistent with national planning policy for the Green Belt:
- I. **Landscape:** 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. **Countryside:** To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
 - III. **Biodiversity:** To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features. We are the home of many areas of nature importance.
 - IV. **Recreation:** To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
 - V. **Rural Economy:** To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
 - VI. **Community Participation:** 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.



B. The CVRP's natural environment resource and potential

- 1) The Regional Park is a natural environment resource for London – for wildlife and for people. This is a link to a storyboard (by the consultancy LUC) concerning the CVRP's assets, issues and challenges: <https://www.colnevalleypark.org.uk/why-we-need-to-protect-the-colne-valley-regional-park/>
- 2) In Annex 3 we reproduce mapping of biodiversity designations within the CVRP. Some are within, and others outside (but close to) the GLA. The key point we make is that, whilst each designation is important it is the combination of waterbodies and green corridors across the CVRP that results in a strategic wildlife corridor of more than regional importance. This is significant for bird life.
- 3) Regarding the CVRP's value for people, it represents the first taste of countryside to the west of London, offering Londoners and those living in nearby urban areas access to the natural environment in a large green corridor, unified by its braided river system the majority of which has its source in the chalk streams of the Chiltern Hills.
- 4) From its inception the Metropolitan GB was seen as having a role providing space for recreation and solace for the urban population. More recently the planning system seems to have shifted to view the Green Belt as a policy to prevent development happening rather than seeing it as a resource to improve the quality of life of Londoners.
- 5) The CVRP has multi-functional roles that can support:
 - green and blue corridors rich in biodiversity and ecological connectivity
 - opportunities for nature recovery and re-wilding
 - local food production
 - combatting climate change
 - active lifestyles, physical and mental well-being
 - recreational pursuits
 - flood management
- 6) With population and density continuing to grow in London and other nearby urban centres, realising the potential of the CVRP's intrinsic 'natural environment' will be more important than ever.
- 7) We welcome the approach by the London Assembly's Planning and Regeneration Committee (William Weihermüller by email dated 13th June 2025) concerning a meeting of the Committee on 26 June about data centres and energy capacity constraints.
- 8) The CVRP is not only a place of value, but it also has an organisation dedicated to the improvement of the area's natural environment, akin to the Lee Valley Regional Park (but without the same funding base). This sets it aside from other areas and offers opportunities to be grasped.

C. Key planning approaches needed for the Green Belt and Grey Belt

- 9) The CVRP's proximity to London and other large urban areas e.g. Slough, Staines and Rickmansworth mean it offers opportunities for sustainable access to its green infrastructure - by walking, cycling, bus, train and tube, with all its attendant benefits for health and well-being. This is consistent with the approach being taken by the GLA.
- 10) The consultation document (at 1.9) identifies London's inextricable links with the neighbouring regions from the point of view of housing provision. Whilst this is undoubtedly the case that link also applies to strategic green infrastructure and how the country relates to the city.
- 11) We seem to be sleepwalking into a fragmentation of the natural environment resource that the Green Belt on the edge of the city represents. We support the statements in the consultation document about the value and importance of green spaces to quality of life. We commend the following principles as part of a positive and strategic approach to planning the future of London:



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- Develop a **positive vision** for the role green infrastructure like the CVRP (and other places like it in the Green Belt) can play for the city, improving its accessibility by sustainable modes.
 - Promote **high quality connectivity between the city and its rural hinterland** so green corridors for people and wildlife are created.
 - If the **Green Belt** is to be **reviewed** conduct that in a way that reflects the Green Belt's potential for the community's health and well-being, including through active travel.
 - If development in the Green/ Grey Belt is considered (for whatever use) ensure it contributes to a **better functioning 'green infrastructure'** for the city, creating a win-win situation.
 - **Include a Plan policy for the CVRP** to provide a framework for handling development proposals akin to that included in the Spelthorne BC plan (Annex 2) which has reached an advanced stage.
- 12) We also commend reference to the [2019 Colne and Crane Valleys GI Strategy](#) as a starting point for evidence to underpin the emerging Plan (see para 22 below).
- 13) We believe the CVRP's potential for London can be realised if policies shaping future development contribute to, rather than detract from, the enhancement of the countryside around London. This is in line with Para 151 in the December 2024 NPPF, which states:
- “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.”
- 14) We note that the five NPPF Green Belt purposes are geared more to preventing things happening than valuing the potential of countryside next to large urban areas to enable people's contact with nature and countryside, with all its potential well-being benefits:
- For better mental health – research backs this up
 - For better physical health – active travel – addressing the obesity crisis
 - For local food production – connecting people with where their food comes from
- We believe these are important issues for quality of life in London and look forward to the Plan addressing this.
- 15) Recent national policy changes, introducing the 'Grey Belt', give us some significant concerns. A significant one is that the 'golden rules' only appear to apply to housing growth, whereas much of the development pressure across the CVRP is from commercial and infrastructure schemes – when issues of achieving open space and connectivity for people and nature are also important.
- 16) Whilst we hope that this omission will be addressed it highlights the importance of local policy plugging gaps with more effective policy wording.

D. Commentary on Green Belt review and Strategic Planning

- 17) We greatly welcome the (re)introduction strategic planning. Connectivity for nature and access to the natural environment by people needs a strategic, cross-border, spatial dimension which has been sadly lacking over recent years.
- 18) If the Green Belt is to be reviewed, we ask that this is not piecemeal and takes account of the strategic role the Metropolitan Green Belt was intended to have when it was conceived. The evidence in our Annex 1 illustrates the dangers of the piecemeal approach to development that we have seen over recent years.



- 19) There will be big decisions across the region about where development needs should be met and strategic planning, with its cross-border approach, offers the opportunity for balanced decisions to inform the plan for growth and the infrastructure to support it. Green infrastructure is part of that and has a strategic, big picture, dimension as well as the more local aspect. We would welcome a dialogue around the role of places like the CVRP.
- 20) Whilst there will be challenges organising joint working on strategic planning across combined authorities, both mayoral and non-mayoral, we believe a key to success will be how the interfaces between those areas are handled. As the CVRP crosses the GLA boundary we look forward to working constructively with all the local authorities to see visionary Strategic Development Strategy(ies).

E. Evidence and Next Steps

- 21) In Annex 1 we include our latest annotated mapping of development proposals affecting the CVRP. This was prepared a couple of years ago and needs updating (the Trust is unable to resource it at the moment). Nevertheless, the information is valuable to convey a sub-regional/ cross-border picture of what is happening on London's doorstep - the nature of the pressures and the piecemeal/ fragmented approach being taken by developers. We fear that the introduction of the 'grey belt' could exacerbate fragmentation of the Green Belt's natural environment and what it could offer to the city.
- 22) Over the last year we have seen the approval of some strategically significant developments in the CVRP that will impact on opportunities for active travel routes across the area and the ability of Londoners to access our countryside. The developments involve schemes to the west, and very close, to Uxbridge, namely:
 - a. Approval of a Motorway Service Area (MSA) following referral to the Secretary of State
 - b. Significant expansion of the Iver electricity sub-station adjacent to that MSA

Along with other large developments approved, many now built, within this stretch of the Green Belt (just outside the GLA boundary) it will undermine the natural environment context of the Iver Environment Centre, threatening its mere existence. This is a facility managed by Groundwork South that attracts many people, especially groups of school children.

The developments in this zone will frustrate the implementation of an off-road active travel route proposed in the 2019 Colne and Crane Valleys Green Infrastructure Strategy (see link below). Over the last 5 years the CVRP has promoted this 2019 Strategy to the various local authorities but the focus of each authority on initiatives within their boundary, the varying timescales of their statutory Plans, the challenge of cross boundary working, and lack of time and staff resources has prevented progress embedding this in the statutory planning system.

The active travel route (less than 5 miles long) could link Uxbridge to wonderful countryside destinations like Black Park and Langley Park. It is a distressing but very relevant example of how a strategy led, 'win-win', approach could have avoided this situation. We welcome the opportunity to engage with the GLA to explain this case study evidence, its relevance to the London Plan and the future quality of life for residents in the capital.

- 23) Rather than provide detailed pieces of evidence (much of which would relate to areas adjacent to, but just outside, the GLA, we suggest browsing pages on <https://www.colnevalleypark.org.uk/>. Below we offer a few links to give an overview that, hopefully, validates the importance of the CVRP to London and the opportunities that need careful strategic planning:



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- https://www.youtube.com/watch?v=mXoql_veFuk (an informative video made in 2017 by students at Brunel University London working with West London Film & Media CIC and Groundwork South)
- <https://www.colnevalleypark.org.uk/why-we-need-to-protect-the-colne-valley-regional-park/> (a storyboard (by the consultancy LUC) concerning the CVRP's assets, issues and challenges)
- <https://www.colnevalleypark.org.uk/lets-create-the-best-green-corridor/> (an article about creating the best managed and best-connected green corridor around any city in Europe)
- <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/> (this strategy was produced by Arup and coordinated by the CVRP just before the Covid pandemic, an event that affected the momentum during its production)

24) The CVRP Trust offers to work collaboratively and constructively with the GLA planning team on the development of the London Plan, promoting a policy approach that:

- Embodies the 'win-win' agenda (that appears to be shared between our organisations)
- Enables a cross Local Authority approach to achieve better connectivity between the city and the natural environment around it
- Dovetails with other 'quality of life' objectives of the emerging London Plan, such as combatting climate change, improving access to green space and the natural environment and improving residents' and workers' health and well-being, including addressing obesity

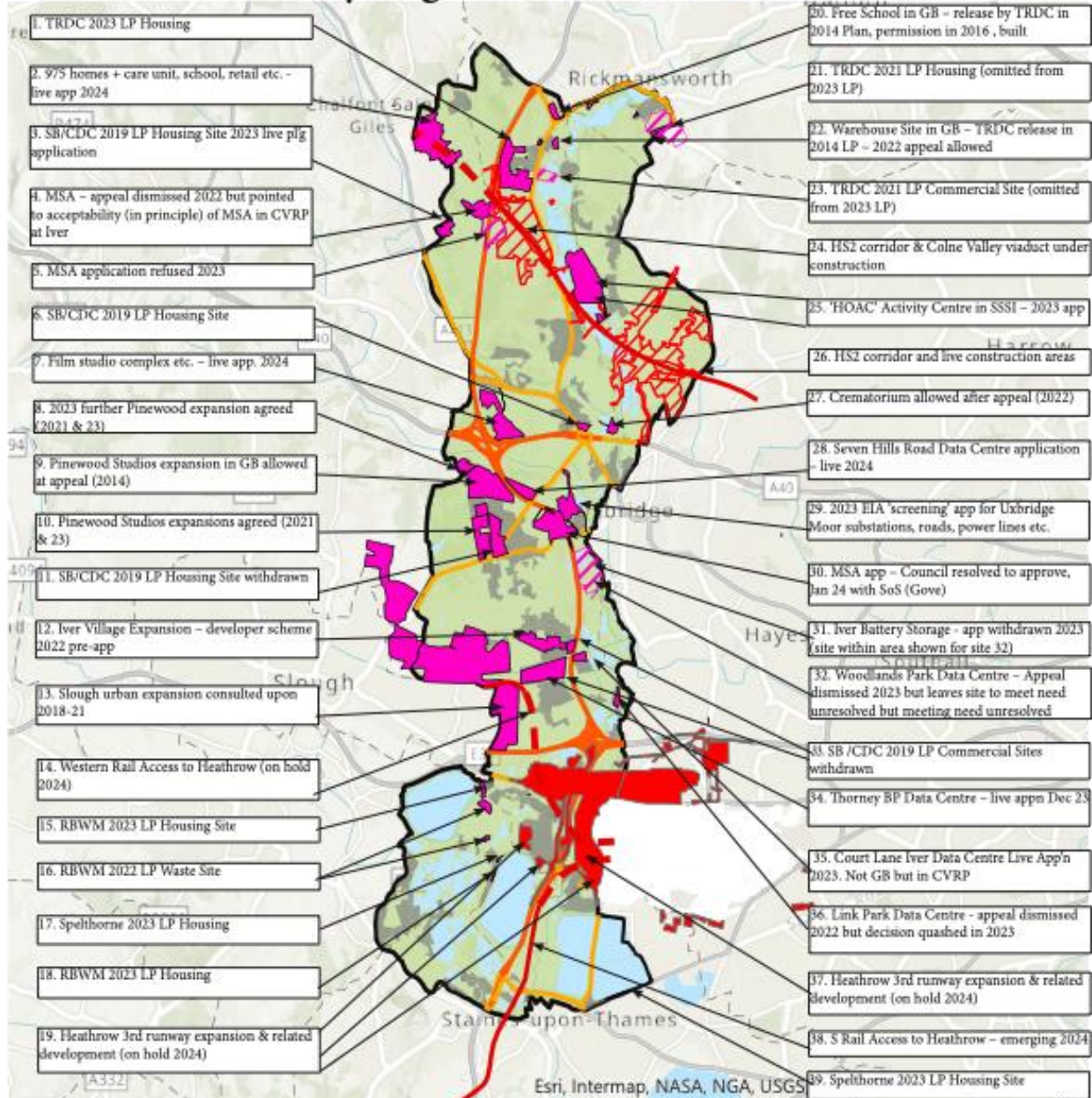
Whilst addressing the critical need across London for housing, jobs and supporting infrastructure and recognises that people and wildlife ignore Council boundaries when they move about.

The **CVRP Trust looks forward to hearing from you** - please contact SPomeroy@groundwork.org.uk or jerryunsworthplanning@gmail.com in the first instance.



Mapping done about 18 months ago to illustrate the scale of recent development proposals affecting the CVRP (and lakes). Whilst it has not been comprehensively updated since then see para 24 for discussion.

Colne Valley Regional Park (The Future)?



Key:

	Major development sites in the GB proposed within CVRP		Major development proposals rejected or withdrawn
	HS2, Heathrow proposed expansion & related schemes incl. rail.		HS2 construction areas (temporary but lasting about 15 years)
	Tunnels		

Abbreviations:

CVRP - Colne Valley Regional Park	SB/CDCS - South Bucks & Chiltern District Council
MSA - Motorway Service Area	TRDC - Three Rivers District Council
app - application	RBWM - Royal Borough of Windsor & Maidenhead

This mapping is periodically updated and aims to capture current/ recent major development proposals in the CVRP, excluding 'temporary' e.g. minerals schemes. There may be major developments missing from the map, which will be updated next time. We welcome comment to inform updates to: Bergey.Sigurdardottir@groundwork.org.uk Feb 2024

Note: Some proposals continue outside the CVRP.



Spelthorne BC Local Plan – CVRP policy with agreed changes

SP5: Colne Valley Regional Park

- 1) The extent of the Colne Valley Regional Park (CVRP) within the Borough is defined on the Policies Map. As a member of the CVRP, the Council will seek to maintain the character and landscape of the Park and promote its benefits and enhancement.
- 2) The Council will expect proposals for development within the Colne Valley Park to make a positive and sustainable contribution towards implementing the objectives of the Park. The Council will support, in principle, development within the Park where it can be demonstrated that it will:
 - (a) maintain and enhance the landscape and historic environment of the Park and its overall amenity value;
 - (b) contribute to the objectives of the Park;
 - (c) conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features;
 - (d) provide opportunities for countryside recreation and ensure that facilities are accessible to all;
 - (e) contribute to a vibrant and sustainable rural economy within the Park;
 - (f) encourage community participation, including volunteering and environmental education, and promote the health and social well-being through high quality green space and its contribution to the wider green infrastructure network and;
 - (g) carry out appropriate surveys, should development within the Park amount to changes to biodiversity areas or designations and recreational facilities.

Reasoned Justification

- 5.22 The Colne Valley Regional Park covers over 10,000 hectares to the west of London. It forms a narrow corridor of countryside, much of it within the Green Belt, stretching from Rickmansworth in the north to Staines and Wraybury in the South where the River Colne joins the Thames. It is some 14 miles long and 3 miles wide at its widest point. It straddles a number of local authority boundaries. The area within Spelthorne covers some 1,000 hectares and comprises three major reservoirs, the areas of Staines Moor, Hithermoor and the settlement of Stanwell Moor. In addition, the River Colne SNCI and King George VI SSSI are key features and located within the Park.
- 5.23 The Colne Valley Regional Park was conceived in the 1960's with the broad aims of providing for informal recreation in a countryside setting. The original objectives remain just as valid today, although they have been updated, modified and extended over the last 50 years:
 1. 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.

2. To resist urbanisation of the Colne Valley Park and to safeguard existing areas of countryside from inappropriate development.
 3. To conserve the biodiversity resources of the Park through the protection and management of its diverse plant and animal species, habitats and geological features.
 4. To provide opportunities for countryside recreation including appropriate accessible facilities.
 5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
 6. To encourage community participation including volunteering and environmental education and promote the benefits of health and social well-being afforded by access to high quality green space.
- 5.24 The Council supports the objectives of the Park and will seek to ensure that land within it is kept open and available for informal recreation where possible and that any proposals for development make a positive contribution to the setting of the Park, its landscape and recreational potential.
 - 5.25 The CVRP produced the Colne and Crane Green Infrastructure Strategy in 2019 which highlighted numerous challenges facing the Park. These challenges include significant development pressure and the need to enhance green infrastructure assets. Improving the network of green infrastructure could benefit Spelthorne by enhancing linkages to the CVRP and wider areas within the Borough. By supporting the approach by CVRP, this presents the Council with the opportunity to enhance beneficial use of the Green Belt linked with the Park, where appropriate.

Mapping of individual designated biodiversity areas within the CVRP

