

## Colne Valley Regional Park Trust

### Response to the draft West London Waste Plan (WLWP) consultation

Response submitted by [SPomeroy@Groundwork.org.uk](mailto:SPomeroy@Groundwork.org.uk) and [rosie@makingplacetogether.co.uk](mailto:rosie@makingplacetogether.co.uk) to [WLWastePlan@ealing.gov.uk](mailto:WLWastePlan@ealing.gov.uk) on 03/02/2026.

#### Key response points

Thank you for the opportunity to comment on the draft WLWP. The Trust's key response points are:

- We welcome the assessment that there is no immediate need for more waste management requirements within the Plan area as it affects the CVRP, and that no new sites for waste development are required.
- We endorse the plan's strategy to support wider environmental goals, and comment below on how its policies can fulfil these more effectively, with reference to the CVRP's own strategy and objectives.
- We say that proposals for sites in the plan that fall within the CVRP resulting in intensification, change of use or any other kind of development, should be required to contribute to the protection and enhancement of the Park, referring to the [2019 Green Infrastructure strategy](#).
- This should also apply to any other proposals that arise ad-hoc for new waste development.
- We also want to emphasise the need for effective enforcement where illegal activities take place.

Our response, below, is in two parts. First, we set out commentary on the context of the CVRP within the scope of the plan area. Second, we provide detailed comments on the plan vision, strategy and specific policies.

We also provide two appendices: Annex 1 consists of more detailed information about the Park, its value to West London and its guiding objectives. The diagram in Annex 2 shows the development pressures within the Park.

#### [The Colne Valley Regional Park \(CVRP\) and its place in the WLWP](#)

1. The physical scope of the WLWP includes six London Boroughs and the most relevant of these to the CVRP is Hillingdon. Of the sites listed in the draft Plan, 22 are within Hillingdon and relevant to the CVRP.

2. The CVRP covers 16% of the area of LB Hillingdon and has considerable potential for further improvement as an asset for the borough and the wider West London area, providing ready access to countryside and nature – with all the proven health and wellbeing benefits that brings to residents and workers.
3. We are keen that any waste development or intensification, and associated traffic movements across the Park, are appropriately mitigated. This includes development proposals contributing to the protection and enhancement of the Park, its landscape, biodiversity, amenity and water quality.

## Comments on the draft plan

### The Spatial Strategy

4. We support the strategy aspiration in para 3.18b for '*high standards of environmental protection... to support wider environmental goals*' and propose this additional wording after 'goals': '*...such as landscape enhancement, increasing biodiversity and improving water quality*'.
5. The index map in Figure 3 would be improved by being on a larger scale and having more detailed resolution. It should also cross-reference the site numbers in Appendices 2 and 3 as it is not possible to appreciate the context for each site from the detailed site maps.

### Comment on the Plan Vision and Objectives

6. We support the ambition of Objective 1: '*Make best use of Existing Waste Infrastructure*' to manage waste, as this will also make efficient use of land.
7. We support Objective 4 '*Deliver High Quality Waste Facilities*'. The Plan's ambition to '*Protect and Enhance the Environment and Communities*' will require development to contribute to local employment and sustainability objectives.
8. We have no comment on the other objectives.

### Plan Policies

9. The draft Plan sets out six policies, WLWP 1 – WLWP 6. Of these, policies WLWP 2, WLWP 4 and WLWP 5 are of greatest relevance to the CVRP.
10. **WLWP 2 Provision of Additional Waste Management Capacity:** We support the policy requirement for proposals to demonstrate that there will be no significant adverse impact or effects on environment and amenity. We suggest that in the supporting text, para 9.28 should include assessment of the impact on **water quality, biodiversity, and landscape**.
11. **WLWP 4 Ensuring High Quality and Resilient Waste Facilities:**
  - a. We support the policy purpose that proposals '*contribute positively to the local area*'.

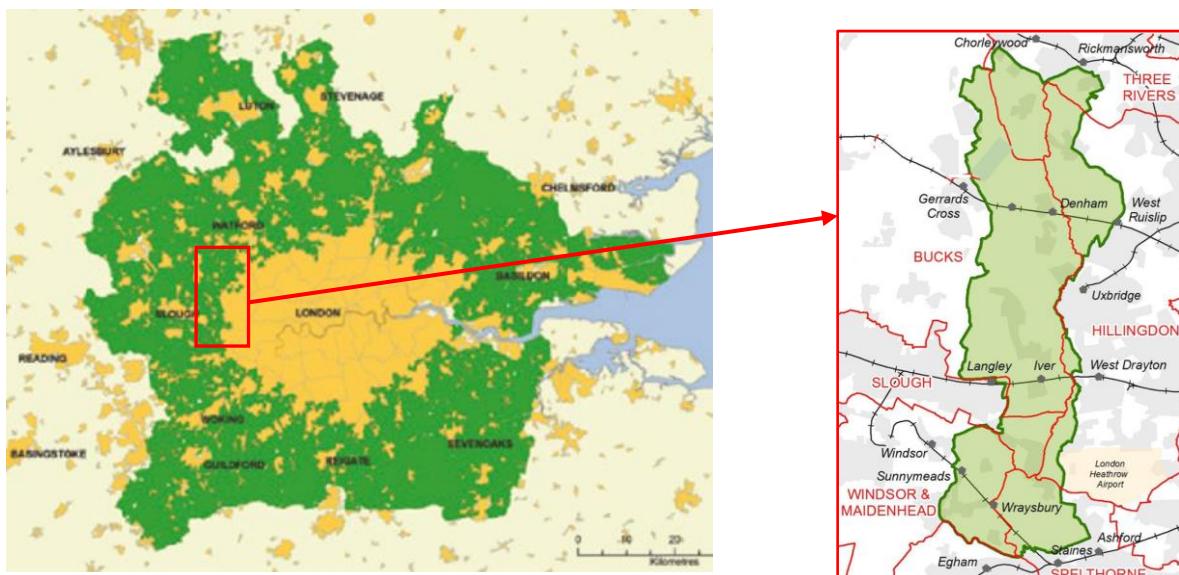
- b. We also support the text of 9.48 that states: '*...opportunities to enhance biodiversity and green infrastructure on and around the site should be maximized to improve visual amenity and provide ecological benefit.*' Specifically, for Hillingdon sites those opportunities should refer to the [Colne and Crane Valleys Green Infrastructure Strategy 2019](#) and this should be included in the plan text.
- c. In our view, the ambition of paragraph B (3) to '*deliver a lasting and positive contribution to the local environment*' is not fulfilled by the subordinate clauses which merely require avoidance of adverse impacts, nor do they fulfil the earlier stated policy purpose to contribute positively. A further subordinate clause needs to be added to B (3) which requires proposals to: "**6. contribute to communities and to the protection and enhancement of the environment (landscape, biodiversity, green infrastructure, amenity, water quality and so on)**".

## 12. WLWP 5 Recovery and Disposal of Waste to Land:

- a. We support the ambition of para 9.53 regarding parks, and ask that the CVRP is specifically mentioned (even as a footnote). A further reference to the Green Infrastructure strategy (as above) would also be helpful.
- b. We support the requirement of WLWP 5 (C) for landscape enhancement. A further clause should be added to (C) "**... demonstrating the protection of water quality, both for groundwater and potential run-off.**"

## Annex 1– Colne Valley Regional Park

1. The CVRP is the first large taste of countryside to the west of London covering more than 110,000 hectares 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 six 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.
2. It 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.
3. The Park was founded in 1965 by a consortium of local authorities, led by LB Hillingdon, that wished 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.
4. The CVRP represents a strategically important part of the Metropolitan (London) Green Belt because it acts as the first taste of countryside west of the capital, offering access to a large area of natural environment, with all the potential mental and physical health and wellbeing benefits this can bring to the 10 million people who live within 15 km of it.



5. The CVRP Trust (a registered charity) oversees the Park, with day-to-day operations managed through a contract with the environmental charity, Groundwork South. The CVRP runs on a small core budget but pursues major funding for countryside improvements, e.g. from the National Lottery. We estimate the benefit of this represents a value of £10 for every £1 invested in or contributed to the Trust's core budget. The aim is to achieve lasting improvements on the ground, and examples of our projects can be seen here: <https://www.colnevalleypark.org.uk/whatwedo/>

6. The work of the CVRP's small team is guided by the organisation's six objectives and focus on delivery – objectives consistent with national planning policy:

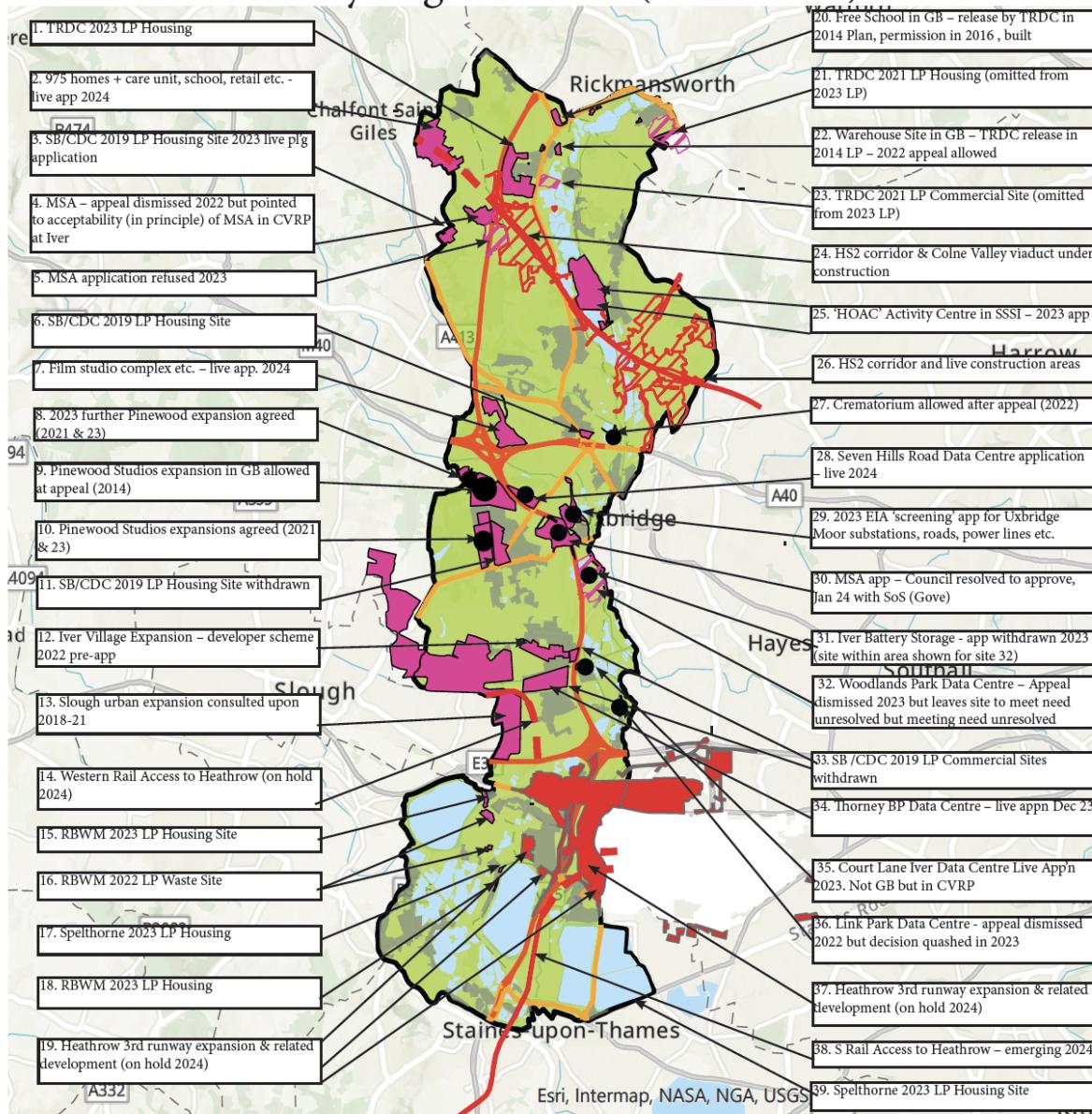
- a) **Landscape:** To maintain and enhance the landscape, historic environment and waterscape of the park in terms of their scenic and conservation value, and their overall amenity.
- b) **Countryside:** To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
- c) **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.
- d) **Recreation:** To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
- e) **Rural Economy:** To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
- f) **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.



## ANNEX 2 Mapping of large development proposals within the CVRP)

Note: The map needs updating properly but conveys proposals not only submitted but also recently agreed

### Colne Valley Regional Park (The Future)?



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](mailto:Bergey.Sigurdardottir@groundwork.org.uk)

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Note: Some proposals continue outside the CVRP.