

Colne Valley Regional Park draft NPPF response

Highlighted policies for comment

Policy	Consultation question(s)	Comments
<p>PM1 Spatial development strategies</p> <p>PM1 1 Spatial development strategies should set a positive vision...</p> <p>PM1 2 (e) 'Identifying broad locations for nature conservation and habitat enhancement, restoration and creation'</p>	<p>6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>6: Partly agree</p> <p>a) The Government's current consultation on proposed SDS areas shows that the CVRP area will be covered by at least four SDSs. We are concerned that it will be difficult to achieve a comprehensive approach to the overall protection and enhancement of the Park across several different strategy areas, and the provisions of PM10 and PM11 on cooperation are not strong enough.</p> <p>Landscapes, biodiversity areas and river basins/water catchments do not respect authority boundaries. The CVRP creates a special case for a significant landscape, encompassing the same river catchment, national importance for wildlife (even if currently not protected across the whole landscape) and large areas of green space in proximity to millions of people in Greater London. Other similar areas exist across the nation... (e.g the Lea Valley Regional Park)</p> <p>PM1 (1) must recognise that even sub-regions are not 'islands' in themselves. We therefore suggest that the following is added to PM1 (1): They should recognise, and plan for, cross-boundary matters from the outset.</p> <p>If this change cannot be added, we ask that any statutory instrument that establishes these SDS areas and boards should mandate cooperation on the comprehensive protection and enhancement of the CVRP across the whole of its extent.</p>

		The Trust particularly supports clause 2 (e) which requires the identification of broad locations for nature conservation and habitat enhancement, restoration and creation. We suggest that '...establishing/enhancing networks of green and blue infrastructure' should be added to this clause, after 'restoration and creation'.
PM2 Local Plans	9) Do you agree with the role, purpose and content of local plans set out in policy PM2? a) Please provide your reasons, particularly if you disagree.	9: Partly disagree a) We are concerned that at the local plan level, there is not a similar prescription for local habitat and nature conservation as at the strategic level under PM1 (2) (e). Here, this is limited to 'improving the environment at the local level'. This clause should reinforce the need for a comprehensive approach to identifying, protecting and extending green and blue infrastructure.
PM5 1 (b) Neighbourhood Development Plans	No question provided	We support the opportunity for NDPs to identify local environmental improvements and ask that 'including green infrastructure' is added after it.
PM10: Maintaining cooperation between plan-making authorities PM11: Demonstrating cooperation between plan-making authorities	15) Do you agree with the policies on maintaining and demonstrating cross boundary cooperation set out in policy PM10 and policy PM11? a) Please provide your reasons, particularly if you disagree.	15: Partly agree Cross-boundary cooperation needs strengthening on landscape-scale protection and enhancement of the environment, and green and blue infrastructure. Landscapes, biodiversity areas and river basins/water catchments do not respect authority boundaries. Therefore an additional clause to section (1) should be added: (1) (c) Cross-boundary protection and enhancement of significant landscapes, river catchments and biodiversity areas.
DM8: Unauthorised development and enforcement	32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the	32: Partly agree a) The CVRP is particularly vulnerable to unauthorised development, especially relating to gravel extraction and waste disposal. The cumulative effects of unauthorised

	<p>proposed policy, which we should consider?</p> <p>a) If so, are there any particular additions or mitigations which we should consider?</p>	<p>development are very detrimental to the landscape and quality of the environment here. A further clause should be added to recognise the cumulative effects of unauthorised development in pursuing enforcement action.</p>
<p>S2: Producing a spatial strategy (1) (c): ‘Land that is protected or proposed to be enhanced for specific purposes’</p>	<p>34) Do you agree with the proposed approach to setting a spatial strategy in development plans?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>34: Partly agree</p> <p>a) We strongly support the identification of land for protection and enhancement within the spatial strategy, but ask that the following is added after ‘habitat improvement: ‘or strengthening green and blue infrastructure’</p>
<p>CC1 (d) climate change: Plan making: ‘Identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1’</p>	<p>42) Do you agree with the approach to planning for climate change in policy CC1</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>42: Strongly agree</p> <p>a) We strongly support the identification of opportunities for green infrastructure provision and nature based solutions. We would like the Framework to reinforce the point that relevant Local Nature Recovery Strategies include not only the one belonging to the plan-making authority, but also those adjoining the authority area, because these opportunities will not necessarily fall neatly within authority boundaries. (As an example: The Colne Valley Regional Park covers parts of five LNRS's: Herts, Bucks, London, Berks, Surrey)</p>
<p>HO4 1(c) Plan-making: ‘Address strategic environmental opportunities and safeguards, including those set out in Local Nature Recovery Strategies.’</p>	<p>55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?</p>	<p>55: Strongly agree</p> <p>a) We strongly support the requirement to address strategic environmental opportunities etc. We would like the Framework to reinforce the point that relevant Local Nature Recovery Strategies include not only the one belonging to the plan-making authority, but also those adjoining the authority area, because these opportunities will not necessarily fall neatly within authority boundaries. (As an example: The Colne</p>

	a) Please provide your reasons, particularly if you disagree.	Valley Regional Park covers parts of five LNRS's: Herts, Bucks, London, Berks, Surrey)
E2: Meeting the need for business land and premises: Decision making	85) Do you agree with the approach to meeting the need for business land and premises in policy E2 a) Please provide your reasons, particularly if you disagree.	85: Partly agree a) The CVRP is particularly vulnerable to opportunistic commercial proposals because it is crossed by several motorways (which are attractive locations for warehousing and distribution), and its proximity to Heathrow Airport and associated commercial potential. We suggest that commercial proposals here should be subject to cumulative impact assessments, rather than each being considered piecemeal.
E3: Freight and logistics: Decision making	86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3 a) Please provide your reasons, particularly if you disagree.	86: Partly agree a) Similarly to E2 above, we suggest that freight and logistics proposals within the Park area should be subject to cumulative impact assessments.
E4: Rural business development	87) Do you agree with the approach to rural business development in policy E4? a) Please provide your reasons, particularly if you disagree.	87: Strongly agree
M4: Considering the impacts of mineral development: Decision making	107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? 108) Please provide your reasons, particularly if you disagree.	107: Partly agree 108: Clause 1 (a) Further guidance should be provided to quantify / specify what an 'unacceptable adverse impact' may be. Clause 1 (c) Plans for restoration and aftercare should take opportunities identified by local strategies for a comprehensive, landscape-scale approach.

<p>L1: Planning for an effective use of land: Plan making</p> <p>L1 (b) (ii) – securing benefits from allocated sites ‘...net environmental gains (for example by enabling significant new habitat creation or improving public access to the countryside)’</p>	<p>114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?</p> <p>115) If not, what further guidance is needed?</p>	<p>114: Partly agree</p> <p>115: The Trust supports the requirement to secure net environmental gains from allocated sites. It would like to ensure that Plans take a comprehensive approach on this matter and suggest this:</p> <p>Clause L1 (b) (iii) – after ‘net environmental gains’ insert ‘contributing to a comprehensive or landscape scale’</p>
<p>Ch 13 – Green Belt</p>		
<p>GB3: Altering existing Green Belt boundaries: Plan making</p> <p>1(a) development of land around stations</p>	<p>133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>133: Partly agree</p> <p>(a) It needs to be remembered that accessible countryside near railway stations is a great way for city dwellers to have easy access to nature on a much larger scale than they might find in their local parks. This becomes less attractive if the visitor has to penetrate a lot of new development to get there. The CVRP is served by a number of stations which may qualify for this approach:</p> <ul style="list-style-type: none"> • Iver, Langley, West Drayton and Denham <p>Other stations in or very near the CVRP include Denham Golf Club, Wraybury, Sunnymeads and Rickmansworth.</p> <p>Therefore we suggest that plan allocations around railway stations must be required to incorporate high quality, wide, green corridors that bring the countryside right to the station giving city-dwellers attractive routes by which to reach the countryside.</p> <p>This revised NPPF should take the opportunity to ensure development can be used to fund restoration of the landscape and improve connectivity for people and wildlife.</p>

		<p>Rather than a blanket approach across the whole of the Green Belt, this could be specifically focused on areas like the Colne Valley Regional Park that are:</p> <ul style="list-style-type: none"> • Nationally important for wildlife; • Right on the edge of large cities with millions of potential beneficiaries; • Subject to multiple large development proposals that could provide the means to improve these green corridors and at no cost to the public purse.
<p>GB4: Defining Green Belt boundaries</p>	<p>No question provided</p>	<p>Green Belt has a strategic purpose of ensuring that towns do not merge into one another, and, for many years, the ‘very special circumstances’ test has allowed a criteria based approach to deal, on a pragmatic basis, with developments in the Green Belt that may be in the public interest. Grey Belt, in effect, takes that ‘criteria based’ VSC approach to a new level, by lowering the VSC bar for certain areas of the Green Belt.</p> <p>However, in applying the criteria of the Grey Belt, there is a risk that the strategic purpose of the Green Belt is undermined by a series of incremental decisions that do not place enough weight on Green Belt’s fundamental purpose. In the consultation draft of the new NPPF, there is some protection in plan making. GB4 1dii states, in the context of reviewing Green Belt boundaries, of "not proposing alterations where there is clear evidence these alterations would fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan"</p> <p>Similarly, in making DM decisions, GB7 1gi says "the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan";</p>

		<p>However, it is the phrase ‘considered across the area of the plan’ that is a weakness. It needs to be considered on a place-making basis on the specific impact that the Green Belt is serving in the location of the development, not across the area of the plan.</p>
<p>GB5: Beneficial uses of Green Belt Land: Plan making</p> <ul style="list-style-type: none"> a. public access b. contribute to relevant LNRSs c. Support specific designations d. Compensating improvements to remaining GB 	<p>134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?</p> <p>135) Please provide your reasons, particularly if you disagree.</p>	<p>134: Partly agree</p> <p>135: Clause (1) (a) should include ‘and nature’ or ‘and the countryside’ after ‘greenspace’ so that communities can enjoy the one of the original primary purposes of the Green Belt.</p> <p>Clause (1) (b) should clarify that a relevant LNRS is not only the one local to the specific planning authority but also other LNRSs adjoining. For example, major development in Iver (Buckinghamshire) may be most appropriately mitigated within the wider Colne Valley landscape (which includes other authorities/LNRSs e.g. Hillingdon BC) rather than elsewhere in the (very extensive) county of Buckinghamshire.</p> <p>Clause (1) (c) should include opportunities to support the objectives of... ‘other significant landscapes’. In the absence of an existing formal designation, the CVRP is liaising with MPs, ministers and Natural England about the need for the core wetland valley floor to be protected. This modification aims to be a placeholder for when an appropriate designation can be developed to protect the Park.</p> <p>Clause (1) (d) should restore some key wording from the old paragraph 151 and add ‘and improve damaged or derelict land’.</p> <p>Clause (1) (d) should be replicated in the Green Belt decision making policies, to mandate compensatory improvements to remaining Green Belt. What happens in practice today is that ad-hoc permissions (especially for commercial sites) are eating away the Green Belt within the Colne Valley with only piecemeal mitigation rather than more comprehensive compensation.</p>

<p>GB7: Development which is not inappropriate in the Green Belt: Decision making</p> <p>1 (h) (i) 'be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment.'</p>	<p>137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements?</p> <p>138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.</p>	<p>137: Partly agree</p> <p>138: It needs to be remembered that accessible countryside near railway stations is a great way for city dwellers to have easy access to nature on a much larger scale than they might find in their local parks. This becomes less attractive if the visitor has to penetrate a lot of new development to get there. The CVRP is served by a number of stations which may qualify for this approach:</p> <ul style="list-style-type: none"> • Iver, Langley, West Drayton and Denham <p>Other stations in or very near the CVRP include Denham Golf Club, Wraysbury, Sunnymeads and Rickmansworth.</p> <p>Therefore we suggest that proposals around railway stations must be required to incorporate high quality, wide, green corridors that bring the countryside right to the station giving city-dwellers attractive routes by which to reach the countryside.</p> <p>This revised NPPF should take the opportunity to ensure development can be used to fund restoration of the landscape and improve connectivity for people and wildlife.</p> <p>Rather than a blanket approach across the whole of the Green Belt, this could be specifically focused on areas like the Colne Valley Regional Park that are:</p> <ul style="list-style-type: none"> • Nationally important for wildlife; • Right on the edge of large cities with millions of potential beneficiaries; • Subject to multiple large development proposals that could provide the means to improve these green corridors and at no cost to the public purse.
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<p>GB6: Control of development in the Green Belt: Decision making</p>	<p>No relevant question offered</p>	<p>Add the following: Clause 4: The impact of any decisions to remove land from the Green Belt under very special circumstances must be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, and improve damaged or derelict land.</p>
<p>TR8: Public rights of way: Decision-making (1) (b) extend, link, improve – access to: I. Green space and countryside ii. Connections to promoted routes iii. Connections to services iv. Connections to public transport</p>	<p>157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? a) Please provide your reasons, particularly if you disagree.</p>	<p>157: Partly agree (a) Clause (1) (b) should support a joined-up approach across authority boundaries: insert ‘across authority boundaries where appropriate’ after ‘existing routes’</p>
<p>Ch 16 Promoting healthy communities</p>		
<p>HC1: plan making 1 (d) Set local standards for the provision of different types of outdoor recreational land...</p>	<p>158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? a) Please provide your reasons, particularly if you disagree.</p>	<p>158 Partly agree a) The overall policy should emphasise the significant benefits that access to nature brings to people’s health and wellbeing. Clause 1(c) refers simply to green space but it should be expanded to maximise opportunities for access to nature and green and blue infrastructure where possible.</p>
<p>HC3: decision making</p>	<p>160) Do you agree that the proposed policies at HC3 and HC4</p>	<p>160 Partly agree</p>

<p>2 Green space provision</p>	<p>will support the provision of community facilities and public service infrastructure serving new development?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>a) New development should provide connections to surrounding green infrastructure where this is available.</p>
<p>P3: Living conditions and pollution: Decision making</p>		
<p>2(e) 'Assess and mitigate impacts where the development could have an unacceptable adverse effect on water quality, especially where this concerns sensitive water bodies such as chalk streams.'</p>	<p>167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>167: Partly agree</p> <p>(a) Further guidance is needed to specify and define an unacceptable adverse effect on water quality, especially on chalk streams and underground aquifers. Chalk streams are a defining feature of the Park landscape.</p> <p>This includes effects from:</p> <ul style="list-style-type: none"> • Sewage dumping • Water abstraction • Pollution • Invasive species • Habitat degradation
<p>Ch. 19 Conserving and enhancing the natural environment</p>		
<p>N1: Identifying environmental opportunities and safeguards: Plan making</p> <p>1 – plans should safeguard and enhance the natural environment (a) – (d)</p>	<p>179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability,</p>	<p>179: Strongly agree</p> <p>(a)</p>

	<p>deliverability, and supporting nature recovery</p> <p>a) Please provide your reasons, particularly if you disagree</p>	
<p>N2: Improving the natural environment: Decision making</p> <p>1 (a)-(f)</p> <p>(c) ‘other relevant assessments’ – emphasises need for recognised plan/designation for CVRP; ditto N1 (1)</p>	<p>181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>181: Partly agree</p> <p>(a) In clause (c), replace ‘ecological networks’ with ‘ecological and green infrastructure networks’</p>
<p>N2 2 If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused.</p>	<p>181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>181: Partly agree</p> <p>(a) The Trust welcomes this policy but suggests that further guidance is required to exactly define ‘significant harm’; ‘adequately mitigated’; and what the appropriate scales of compensation are. This will help both applicants and planning authorities alike to avoid prolonged debates on definitions in the course of determining proposals.</p>
<p>N4: Protected Landscapes: Decision making on proposals within protected landscapes</p>	<p>182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?</p>	<p>182: Partly agree</p> <p>(a) However, the Colne Valley Regional Park is not a protected landscape. It deserves a coherent approach to protection, but it is difficult for an area that encompasses nine different local planning authorities to achieve consistent policy across the whole of its territory. Lack of coherent protection is leading to a deterioration in the quality of beauty that might once have justified its designation as a National Landscape. Without</p>

	a) Please provide your reasons, including how policy can be improved to ensure compliance.	further protection, the opportunity to protect what now exists and restore any former beauty will be very difficult.
N6: Areas of particular importance for biodiversity: decision making		
<p>1. To support the conservation of important habitats, development proposals affecting...</p> <p>a) international sites (SPAs and SACs)</p> <p>b) National sites: SSSIs</p> <p>c) Local Wildlife Sites</p>	<p>183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised sites within the planning system?</p> <p>a) Please provide your reasons, particularly if you disagree.</p>	<p>183: Partly agree</p> <p>(a) N6 (1) addresses specific sites in isolation, whereas a landscape-scale assessment of a range of sites may be appropriate where the sites contribute to a coherent network of biodiversity.</p> <p>The Lawton Principles, derived from the "Making Space for Nature" report, advocate for a landscape-scale approach to conservation. They are summarized in four key principles:</p> <p>More: Increase the number of sites for nature. Bigger: Enhance the size of existing sites. Better: Improve the quality of habitats. Joined: Create connections between habitats to form a coherent ecological network.</p> <p>The policy should add a further clause: (Development proposals affecting...):</p> <p>(d) a coherent landscape composing a network of wildlife sites (of a range of levels of importance) should only be supported if:</p> <ul style="list-style-type: none"> i. there would not be a significant adverse effect on the integrity of the landscape as a whole; or ii. the benefits of development in the location proposed clearly outweigh the likely impact on the features which make the landscape valuable for nature conservation as a whole.

<p>2. Other irreplaceable habitats, e.g. AW</p>		<p>Regarding N6 (2), the Trust strongly agrees that irreplaceable habitats, including Ancient Woodland, should be protected from development. However, chalk streams, a globally rare habitat, are not in the schedule of irreplaceable habitats.</p> <p>In the absence of elevating chalk streams to an irreplaceable habitat, we suggest that 'irreplaceable habitats' is replaced with 'priority habitats', which would confer protection on other sites including some rivers (though not all rivers within the CVRP).</p> <p>Alternatively the policy could include a further clause on the protection of priority habitats to N6 (1) along similar lines to clause (c) relating to Local Wildlife Sites.</p>
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