

Spatial Development Strategy areas: response of the Colne Valley Regional Park Trust

Submitted on behalf of the Trust by Rosie Brake MRTPI, Making Places Together

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1. Which SDS area(s) are you interested in?
 - Bracknell Forest, (Buckinghamshire), Oxfordshire, Reading, Slough, Swindon, West Berkshire, Windsor and Maidenhead and Wokingham
 - Hertfordshire
 - Surrey
 - Greater London
2. Do you agree with the proposed SDS area (where one is provided)? If so, please explain the strengths of the proposal as you see them.
 - The Trust recognises that no single geography will suit everyone. There are four SDS proposed to encompass the Park area (see our answer to q1), which improves on the current nine local planning authorities (across two tiers of government). This is still not an ideal framework for the Park and we expand on the issues in our answers to Questions 3 and 4.
3. If you do not agree with the proposed SDS area, please explain the issues/challenges that it/they would present.
 - There is a strong likelihood that even four authorities will fail to prepare comprehensive and consistent policy across the whole of the park area, unless they are specifically directed and supported to do so by government. We also note that Buckinghamshire appears to have reservations about being part of a Thames Valley strategic area and may prefer to plan independently. This would increase the number of strategic authorities relevant to the park to five.

- The new draft NPPF sets out in policies PM10 and PM11 the requirement for authorities to cooperate across borders. However, this cooperation most keenly focuses on housing and economic growth, neglecting the natural environment. We would like each authority to prepare complementary and consistent policies which deliver protection and enhancement for the whole park area – and enables development to pay for that.
 - Each SDS is likely to come forward on a different timetable, so even if policies are consistent, they may not come into force simultaneously.
4. If you do not agree with the proposed SDS area, please suggest and explain one or more alternatives that you believe would work better.
- The Trust would prefer a single SDS to cover the whole Park area. We acknowledge, however, that the new SDS geography will leave the Colne Valley Regional Park split between different SDSs.
 - The risk with this is that there will be different policy approaches from different regions, which is what we experience now, being at the edge of multiple authorities. The new SDSs threaten to continue this problem, albeit in a different configuration. Consequently, the potential for the area to be instrumental in the delivery of wellbeing, climate and biodiversity outcomes to each of the SDSs will be lost, and the Park will be lost with it.
 - Government must therefore mandate that SDS regions 'plan across their edges' in a co-ordinated way. This needs to be more than just a large-scale voluntary 'Duty to Cooperate'. There needs to be some formal mechanism, and in this the Colne Valley is no different to many other strategic planning issues which are often cross boundary. Indeed, Heathrow is such a case – and, of course, has a direct impact on the Colne Valley.
 - One mechanism would be to shift the focus onto the outcomes that each SDS must be there to deliver. Planning can become focused on process and lose sight that it is about outcomes on the ground – driving the economy, our race on climate change, improving wellbeing, and so much more. A formal national reporting mechanism about outcomes would require a formal integrated common approach on cross border issues to be built into the SDS process.
 - There could equally be other approaches – the point is that the Colne Valley, along with many other places that sit on SDS boundaries, need to have a formal mechanism that requires meaningful cross boundary cooperation. It cannot be left to chance and a voluntary approach.
 - This requirement could be set out in the Statutory Instrument that brings the new Boards into being. We note, however, that a new Board is required only for

- the Thames Valley strategic area, as adequate arrangements are already in place for Hertfordshire, Surrey and Greater London. Therefore, we ask that the Secretary of State give specific instructions to these other authorities (and Buckinghamshire, if it decides to plan alone) to cooperate on policy regarding the Park along the lines we have suggested.
- We need the Government to create a protective designation for the Park of a similar status to National Landscapes – but bespoke to the opportunities for public benefit in the rural/urban fringe and that well-planned development could contribute toward the costs of providing these benefits. This would enable the Park and local authorities to ensure development is co-ordinated and contributes to restoration of wildlife-rich green corridors for the benefit of current and future generations – in line with the stated intentions of the Minister for Housing & Planning. The Park occupies a key ‘inner’ part of the Metropolitan Green Belt, but this offers limited protection as speculative applications are often permitted (either on the grounds of very special circumstances, or of not being inappropriate development), especially large-scale commercial proposals (to which the Golden Rules do not apply) which have a significant adverse effect on the landscape here.
 - An additional and unique risk to the Park (and other similar wildlife-rich landscapes that cut across multiple planning authorities) is the implementation of Grey Belt assessment. Current policy and guidelines say that assessments should evaluate whether Grey Belt releases would fundamentally undermine the remaining Green Belt **across the plan area**, but this evaluation needs to look further at a strategic undermining of the Metropolitan Green Belt in respect of London itself. This is happening now in the case of [Buckinghamshire Council’s local plan Green Belt study](#). See figure ES.2 where the Park area in the south-east corner of Buckinghamshire is mostly shown as Grey Belt or Provisional Grey Belt.
 - Key assets to the Park are the chalk streams that run through it. Chalk streams are a globally rare habitat and irreplaceable in the practical sense. It would therefore help the Park if chalk streams were added to the schedule of irreplaceable habitats protected by law.
5. If there is no proposed SDS area for your area of interest, we would welcome your preferred SDS area with an explanation of your reasoning.
- N/A