

Planning Reform Working Paper: Development and Nature Recovery
Submission to Planning Policy Division from Colne Valley Regional Park - February 2025



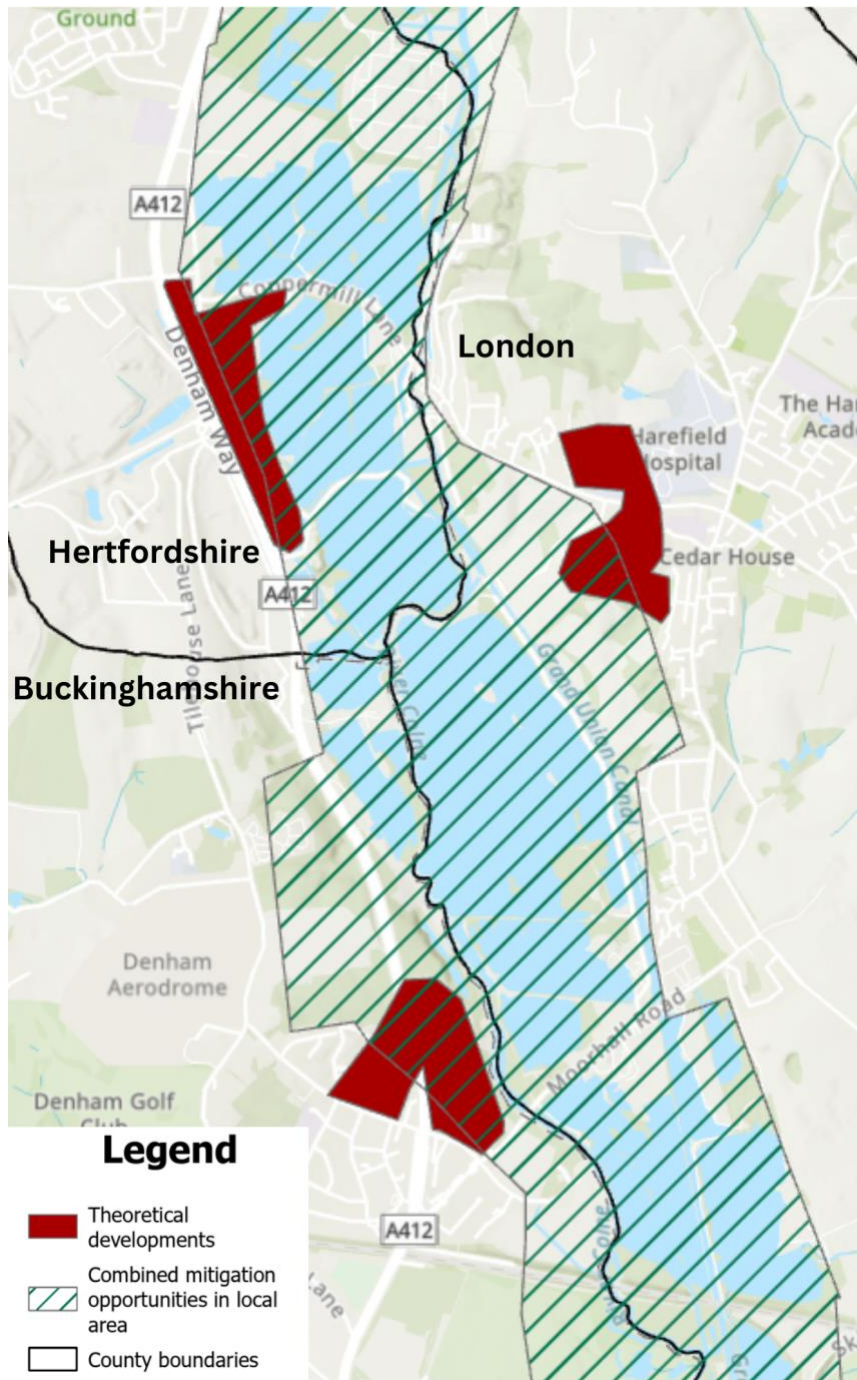
1. This succinct response is submitted by Jerry Unsworth MRTPI jerryunsworthplanning@gmail.com on behalf of the Colne Valley Regional Park (CVRP) Trust. It relates to all questions posed in the discussion paper but particularly questions b, c, d and g.
2. We make this submission based on our recent experience of increasing development and pressure for growth in our area of nature on the edge of London over the last 10-15 years. We have not answered each specific question as we consider there are wider issues at stake.
3. Please do not get the impression that we are opposed to what you intend introducing, we just wish to flag that a broader approach is needed if a proper win-win for development and nature (and public access to it) is to be delivered. The implementation tools for this broader approach can be linked to those you advance.
4. The CVRP was set up in 1965 and covers 110km² right on the western edge of London and embraces parts of 9 local government areas. Annex 1 provides some summary information about it. We are run by a registered charity aimed at improving the landscape and environment and people's access to it. We are a pro-countryside, not anti-development, organisation.

5. Our headline comment on the discussion paper is that we support the principles behind the changes outlined. These chime with the calls we have made for a win-win for both nature, access to nature and major development in Green Belt/ grey belt planning policy.

6. However, our experience on the ground demonstrates that a rather broader approach is needed if government is to realise the ambition shown in the working paper:

- To recognise the critical value that our communities derive from the natural environment – the lack of reference to people's access to nature and countryside appears a major omission.
- From our experience working on the edge of London, with multiple local authorities, this is precisely the sort of locality where many development proposals come forward - for housing, business or infrastructure.
- The discussion paper should emphasise the importance of cross-border working to deliver improvement on a landscape and catchment-scale (in line with Defra's Catchment-based approach) and point to mechanisms to facilitate that. Both wildlife and people need nature corridors planned at a strategic scale if connectivity between urban areas and the countryside around them is to be achieved.
- At the top of the next page, we highlight three theoretical development sites in a part of the CVRP where three county boundaries meet (to the north-west of Uxbridge and west of Harefield). This is to illustrate the importance of a workable cross-local authority approach and the potential role of organisations like the CVRP to deliver, on the ground, the win-win approach you seek within that local area.

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- Taking the broad approach that we commend could ensure major development is married with nature corridors, active travel routes and environmental improvement in the local area relevant to the site in question.
- The edge of large urban areas is precisely where public access to countryside can bring multiple benefits - for mental and physical health and generally enhancing quality of life.
- Can this be brought into your approach in a stronger way? Not to preclude development in the right areas but linking it with strategic thinking and planning.

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7. **This all points to a broader definition of what environmental improvement is being called for.**

When major development is deemed, in principle, to be appropriate we believe that the 'countryside improvement' issues that need to be addressed are wider than nutrient neutrality, biodiversity offset and the 'nature recovery' that you have outlined. Cross border connectivity is needed for both nature recovery and to facilitate people's access to nature. Mechanisms for this can complement the more strategic/ area-wide approach envisaged – which we fully support.

8. Our central premise is that the countryside within the 'inner' Green Belt on the edge of large cities has a critical role to play in improving the health and well-being of the millions of people living in large urban centres. This is not about whether there should be building in the Green Belt; it is about properly valuing what the countryside on the edge of cities can offer – so that if building does happen, it effectively connects that countryside with the urban areas it surrounds. The current NPPF approach to Green Belt fails to recognise this strategically important aspect.

In addition to our general comments above we set out a few specific suggestions below, following the paragraph and page (p1 etc) numbers in your discussion paper.

Para/ page	Your text and Our comment
Para 3 p2	“We need to rebuild nature at the same time as building the sustainable homes, clean power, and other infrastructure we need ...” We fully support this. It's really encouraging that the government is on to what is happening and a potential solution. We just need to join the dots to ensure it works in practice.
Para 4, p2	“...we need to move to a system that can identify and deliver on opportunities for development to collectively fund nature projects at the right spatial scale.” As well as this we should also have 'in the right places' i.e. in the vicinity of the communities/ the landscape that is hosting the development. Should happen at a landscape or catchment scale overcoming the local blocks to this (i.e. county boundaries have proved local blocks to the right scale and right places in the past – this should not be happening).
Para 6, p2	“This will focus on cleaning up our waterways ...” The focus on 'cleaning up waterways' is further driver for why this approach must be done on a catchment/landscape scale. Rivers often form boundaries between administrative areas, so we need to ensure developer contributions from nearby are pooled together to make a difference at the scale needed. This approach is in line with DEFRA's catchment-based approach.
Para 8, p3	“we are committed to restoring nature, including sites of international and domestic importance ..” As well as restoring nature 'sites of international and domestic importance' we should create protection and improvement in the links between them. Again – CVRP is the perfect location to deliver this.
Para 10e, p3	“give delivery partners the tools ...” the first reference to 'delivery partners' - the CVRP is ideally placed to be one of these, working in collaboration with the national bodies, local authorities, wildlife trusts etc.

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Para 13a, p4	“... address environmental impacts from development to be taken strategically, at an appropriate geographic scale, rather than at the level of an individual project ...” we strongly support this statement
Para 13b, p4	“... organisations with the right expertise and with the necessary flexibility to take actions that most effectively deliver positive outcomes for nature ...” the CVRP is an organisation with the ‘right expertise’ and ‘necessary flexibility’ but needs the resources (from the development in question) and the powers (from the appropriate bodies).
Para 17a, p5	“... the introduction of District Level Licensing ...” we understand where you are coming from but if this is adopted as a one size fits all approach for all species there will be some real losers for species that aren’t very mobile and that exist in small pockets of fragmented habitat with little connectivity or opportunity to create connectivity e.g. adders near urban areas.

9. Thank you for the opportunity to become involved in this discussion.
10. We believe that the CVRP is an ideal umbrella organisation to test bed a cross LA-border approach to countryside improvement alongside well-planned major development.
11. The major development projects¹ over the last decade that we have had to engage with is not what we wanted but, being a pro countryside organisation in a strategically significant location, this we believe gives us a well-informed perspective and we would welcome being approached to continue the discussion.

¹ Includes HS2, Heathrow expansion, housing, a Motorway Service Area, Mega Data Centres and Film Studios

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ANNEX 1

Basic information about the Colne Valley Regional Park

About the Colne Valley Regional Park

The Colne Valley Regional Park (CVRP) is the first substantial taste of countryside to the west of London. The Park, founded in 1965, stretches from Rickmansworth in the north to Staines and the Thames in the south, and from Uxbridge and Heathrow in the east, to Slough and Chalfont St Peter in the west.

The CVRP occupies a strategically important part of London's Green Belt and we have significant experience of how Green Belt policy has worked (or not) over recent decades.



As the first Green Belt area west of London the CVRP offers those living in urban areas access to the natural environment, with all its attendant benefits for health and well-being. Its multi-functional roles 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

We believe the CVRP is unique in having an organisation established specifically to protect and improve this area of 'inner' Green Belt on the edge of the capital, working in collaboration with local authorities and other partners. Funding is, however, minimal.

The Colne Valley Park Trust oversees the park and is a registered charity. Day-to-day operations are managed and implemented through a contract with Groundwork South, a not-for-profit company operating in the environmental sector.

Everything we do in the park is guided by its six objectives. These are consistent with national planning policy for the Green Belt:

1. **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.
2. **Countryside:** To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. **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.
4. **Recreation:** To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. **Rural Economy:** To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. **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.