

July 2019



Dear Sir/Madam

Re: application PL/19/2260/OA

The Colne Valley Park CIC exists to maintain and enhance the Colne Valley as the first taste of countryside to the west of London for the benefit of more than three million people who live within 10 miles of the Park. The Park covers an area from Rickmansworth to Staines, across parts of Herts, London, Bucks, Berks and Surrey. The six objectives of the Park are:

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 safeguard the countryside** of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. **To conserve and enhance biodiversity** within the Park through the protection and management of its species, habitats and geological features
4. **To provide opportunities for countryside recreation** and ensure that facilities are accessible to all.
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. To promote the health and social well-being benefits that access to high quality green space brings.

The whole of application site is located within the Colne Valley Regional Park. The development will result in:

- landscape and countryside impact in conflict with objectives 1 & 2
- impact on the attractiveness/countryside setting of footpath CSP 16 in conflict with objective 4
- the loss of productive agricultural land in conflict with objective 5 and the loss of potential habitat for farmland wildlife in conflict with objective 3.

We disagree with the developer's assessment of need. The opening of the Beaconsfield MSA has reduced the need for another MSA in this area. With future changes in technology e.g. driverless cars the case for service areas every few miles will reduce.

There is no certainty in the draft S106 Heads of Terms about how the proposed mitigation area will be managed and maintained in perpetuity. On the basis of the extent of the red line the developer cannot deliver mitigation within the development site and thereby render mitigation acceptable in planning terms. We are concerned that the mitigation is outside of the extent of planning controls and therefore there is no certainty that this will be sustained in perpetuity. We note that the developer has

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control over all the land proposed for mitigation so are disappointed they have chosen to adopt this narrow and restrictive approach. In addition the area of mitigation is too small geographically and does not go far enough to mitigate for the impacts of the MSA in the middle of the Colne Valley Regional Park and green belt.

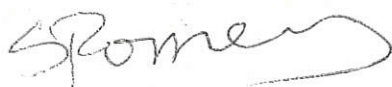
We note that there are letters in support of this application from another local authority area where an alternative MSA has been proposed.

We object to this development because:

- We dispute the need for a MSA and therefore that 'very special circumstances' for development in the green belt are not met.
- The impact on the delivery of the Colne Valley Park objectives in this area and the permanent loss of the ability to deliver those objectives.
- Insufficient mitigation and no long-term certainty for the proposed mitigation area as the developer has chosen not to include this land (which is in their control) within the development boundary.

If the council is minded to approve this application we strongly urge that conditions should be imposed to ensure sufficient mitigation through S106 to deliver the objectives of the Colne Valley Regional Park for the benefit of local residents and wildlife in the area around the site (from Chalfont St Peter to Maple Cross to West Hyde to the northern part of Denham Parish). This will address the negative effects of the development on the Colne Valley Regional Park through improvement of the Park surrounding the site. This could be delivered through a Countryside Management Service for a relatively small investment/year which would also fund the enabling role that will be required where land is not under the direct control of the developer, local authority or Colne Valley Park CIC.

Yours sincerely



Stewart Pomeroy
Managing Agent

For and on behalf of the Colne Valley Park Community Interest Company

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