

President: Rt.Hon. the Lord Randall of Uxbridge Kt.PC.

Laura Peplow
Planning Service
Buckinghamshire Council
King George V House
King George V Road
Amersham
HP6 5AW



October 2020

Dear Laura

Re: Screen Hub PL/20/3280/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 Colne Valley Park CIC strongly **objects to this application** because:

- A. The development is contrary to Green Belt Policy and will harm the Colne Valley Regional Park.
- B. Mitigation relating to the above is inadequate

Colne Valley Regional Park objectives:

We disagree with the assessment on pages 56-58 of the Planning Statement that the application delivers a gain relating to the Colne Valley Regional Park objectives. The Planning Statement completely ignores the effect on the Rural Economy (farming) objective, and underplays impact on the Landscape, Countryside and Recreation objectives. With regard to our Biodiversity objective, we acknowledge the 10% net gain delivered on site, but in our view this does not outweigh the harm caused to the other objectives.

Colne Valley Park Community Interest Company

Registered Office: c/o Colne Valley Park Visitor Centre, Denham Court Drive, Denham,
Buckinghamshire, UB9 5PG
www.colnevalleypark.org.uk

A company limited by guarantee. Registered in England. Company No. 08131867

Permissive path from Iver Heath to Black Park:

The existing permissive path is to be lost and a new one provided. However, this is in a location that doesn't connect as many local residents with Black Park as well as the current path, does not improve the connection to public footpath 4 and is in an unattractive urbanised setting through a car park. Our expectation is that a development of this scale should take the opportunity to improve the off-road connections through the site between Iver Heath and Black Park, rather than making them worse. Peace path should be retained in its current location. A better location for new path between Iver Heath and Black Park would be in the green infrastructure corridor around the Lodges and through the centre of the site. This GI corridor should be widened to allow for accommodating the path and habitat connectivity

Black Park:

Black Park is one of the key visitor attractions within the Colne Valley, and its situation within a rural landscape is important. The impact of buildings of up to 21.5m high within 30m of the bridleway on the east of the Park is huge. We find it incredible that this impact is described as being not significant. There will also be additional visitor pressure on the Park. The significant additional light and noise pollution adjacent to Black Park is unacceptable.

Green Belt:

The site is not identified in the Local Plan – neither the existing plan nor the emerging local plan. The development is clearly at odds with the National Planning Policy Framework relating to green belt.

The exceptional circumstances for building on the green belt have not been proven - there is no reason why this visitor attraction needs to be co-located with Pinewood. Whilst there may be an employment argument from a national perspective we are not convinced that that pertains here. This is a high employment area and it seems likely that most of the jobs that will be created will have to be filled by people travelling from outside the area.

This proposal is a further example of the piecemeal development happening in the green belt across the Colne Valley Regional Park. Claiming 'Very Special Circumstances' is becoming a standard approach for large developments seeking to build on the Green Belt. Because of the sheer number of applicants claiming 'Very Special circumstances' for development in the green belt we believe that developers should no longer be able to justify that the circumstances are 'very special'!

Sustainable Development:

The project does not deliver well against all three principles of sustainable development. We understand the economic argument, but since this does not directly concern our objectives we make no further comment. The social argument might be made stronger with better active travel. The environmental argument is very weak, with only 9.8ha of on-site green infrastructure – much of which is already present.

Mitigation:

We fundamentally oppose this application which we feel is out of all proportion with the site and its surroundings, but in any case the suggested mitigation is woefully inadequate for a development of this exceptional size and impact in the green belt and Colne Valley Regional Park even if it were to be approved.

Colne Valley Park Community Interest Company

Registered Office: c/o Colne Valley Park Visitor Centre, Denham Court Drive, Denham,
Buckinghamshire, UB9 5PG
www.colnevalleypark.org.uk

A company limited by guarantee. Registered in England. Company No. 08131867

President: Rt.Hon. the Lord Randall of Uxbridge Kt.PC.

To address the impact and to help better align the development with the social and environmental pillars of sustainable development we make three broad suggestions:

- 1) Mitigation for the impact on the Colne Valley Regional Park through implementation of the Colne & Crane Green Infrastructure Strategy for the benefit of local residents and visitors to the screen hub. This should be delivered through funding a Countryside Management Service (whole area opportunity X) delivering improvements in the vicinity of the development including whole area opportunities A,P,Q and mid-Colne opportunities MC104, 201, 203, 205, 207
- 2) Mitigation to address the visual, lighting, noise, disturbance impact on Black Park as well as increased visitor numbers
- 3) Uxbridge to Black Park cycle/walking route taking the opportunity, where possible, for attractive off-road routes away from busy A-roads. This would benefit residents of Uxbridge and West London who want to use 'active travel' to visit the proposed screen hub and Black Park. It would also provide a clear benefit for residents of Iver Heath and for Pinewood employees. A feasibility study should be commissioned now with implementation linking to future planning applications should this outline application be approved. This study should focus on are-wide links as well as local links e.g. opportunity to improve footpath IV4 to encourage walking and/or cycling access for local residents and employees. Buckinghamshire Council and the Colne Valley Regional Park should be involved in the specification for the feasibility study and in reviewing outputs.

We would be happy to engage with the Local Planning Authority or the developer to discuss any of the issues raised.

Regards

S.Pomeroy

Stewart Pomeroy
Managing Agent

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

Colne Valley Park Community Interest Company

Registered Office: c/o Colne Valley Park Visitor Centre, Denham Court Drive, Denham,
Buckinghamshire, UB9 5PG
www.colnevalleypark.org.uk

A company limited by guarantee. Registered in England. Company No. 08131867