

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

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



February 2021

Dear Sir/Madam

Re: Planning application PL/20/4332/0A Motorway Service Area between Junctions 15 and 16 near Iver Heath

This application falls within the Colne Valley Regional Park (CVRP) and the Green Belt. Buckinghamshire Council and the former Chiltern and South Bucks Councils have been supporters of the CVRP since its inception. We hope the Council will continue to uphold the six objectives of the CVRP since this application represents the loss of farmland; the loss of 46 Ha of the CVRP and the Green Belt in a sensitive location; harm to recreational rights of way; harm to watercourses which run through the development, and the loss of, and harm to, existing grassland, woodland, hedgerows and their accompanying biodiversity.

- This response to the planning application also looks at the case for the Motorway Service Areas affecting the CVRP, including the one in this location
- The strategic planning context and the impact on the Green Belt
- The extent of the harm arising from the scheme and
- The scale of mitigation that should accompany the development if the 'very special circumstances' (VSC) were to be accepted by the decision maker (whether the Council or Secretary of State).

The case for an MSA in this location

This application for a motorway service area is one of three currently being considered by local authorities along the north-western edge of the M25. All the operators state that there is a need for an MSA on this stretch of motorway between the existing Cobham and South Mimms MSAs. This proposal is, however, less than eight miles from the existing Beaconsfield services on the M40, and is in the same district. How many other districts have two MSAs?

The application requires the Smart Motorway in this part of the M25 to go ahead. Due to several deaths on other parts of the network which have already become Smart Motorways, there must be some uncertainty as to whether this upgrade will go ahead.

The Circular which guides the provision of MSAs is out of date. It precedes the National Planning Policy Framework which gives considerable emphasis to

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environmental objectives; biodiversity protection; minimising waste and pollution; mitigating and adapting for climate change and moving to a low carbon economy. Does this proposed development for an MSA meet these requirements? Our argument is that it does not.

The government has committed to bringing all greenhouse gas emissions to net zero by 2050. All new cars will be electric within five years of this facility opening (2030). MSAs not only attract motorway users, but also those who see it as a destination either for food or accommodation. Are these journeys necessary when facilities already exist nearby? Uxbridge Town Centre, for example, is a very short distance away, and, as stated above, the Beaconsfield MSA is less than eight miles away.

Is a surface level car park for more than 1,000 cars a good use of the land in a GB? A two-storey car park sunk into the landscape on half the land would have a lesser impact on the openness of the GB. Why does the hotel need to have three storeys? There are no three-storey buildings of this height anywhere nearby in the open countryside.

The provision of a large expanse of parking for HGVs seem at odds with government proposals for platooning lorries already approved by the UK government.

Noise and light pollution will have an enormous impact on the quality of life for both humans and animals alike in this rural area. The location of HGV parking next to a large area of woodland will have a direct and significant negative impact. It will be in constant use 24hrs a day, with all the attendant light pollution and noise from engines, air conditioning units and human activity.

Air quality will be worsened in this AQMA and Clean Air Zone for Iver Parish (something we note is not mentioned by the applicants). Additional HGV traffic during removal of winnable sand and gravel, and during construction, will negatively impact the local road network.

Strategic Planning Context

The beneficial side of the Green Belt and the CVRP's role in that

Once GBs are defined, NPPF Para 141 calls on local planning authorities to *“plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*

The CVRP was established in 1965 with the support of a consortium of Local Authorities (including the predecessors of Buckinghamshire Council) to protect and improve this part of the Metropolitan GB, so partly fulfilling the Council's role as set out in Para 141. The CVRP's six objectives (set out in full in our website) effectively mirror Para 141 and how proposed developments 'perform' against those objectives is a relevant consideration.

It is now well established that the natural environment and recreation opportunities provided by the Green Belt offer a critically important physical and mental health resource for the wider population, as well as its obvious benefits to wildlife. The protection and enhancement of this resource for the long term is fundamental to the role of the CVRP. Once that resource is lost to development it is lost forever. This

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flags the importance of there being a scale of mitigation proportionate to the scale of the development and the harm that flows from it, something we explore below.

The particular sensitivity of this part of the Metropolitan Green Belt

The tests for assessing the potential acceptability of ‘inappropriate’ development in the GB may be the same wherever its location, but the spatial context of the part of GB in which the site is located must also be factored into decision-making. It should also inform the nature of mitigation if development is to be countenanced.

In the strategic Green Belt review undertaken by Arup and published by former South Bucks and Chiltern District Councils in 2018, this zone was categorised as part of the coherent ‘London Fringe’ zone. The report highlighted the characteristics and sensitivities of the part of that zone around the application site, referring to:

“... a strategic arc of open spaces separating the large built-up areas of Greater London and Slough, and smaller settlements such as Iver, Iver Heath ...”

“...a number of narrow bands of Green Belt are vitally important in preventing merging of settlements”

These gaps are essential in preventing the merging of the major urban settlements of Greater London (London Borough of Hillingdon) and the smaller settlements of Iver and Iver Heath. Any change or development in this area could act to significantly compromise the acknowledged role played by the Green Belt in maintaining separation between urban settlements.

This proposed development falls within the narrowest part of the Green Belt separating the urban areas of Uxbridge and Iver Heath, only 1.7km wide. The presence of the M25 and the existing electricity substation on the eastern side of the M25 narrows this important gap of undeveloped land further.

It is no coincidence that the extent of the CVRP significantly coincides with the ‘London Fringe’ zone – an area that needs particularly careful attention and planning. The Park provides an important area of countryside to the west of London.

To promote that careful attention and planning, the CVRP CIC collaborated with a number of other organisations, including the relevant local authorities, to produce the “*Colne and Crane Green Infrastructure Strategy*” during 2019. The Strategy provides useful guidance on how to address the many challenges facing the area. It is intended to be used alongside, and to inform Development Plans as well as to “... *inform both the design of development proposals and their comprehensive mitigation and planning obligations.*” It can be found here:

<https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>

It should also be noted that the impact on the CVRP and the Green Belt is not confined merely to this development but by other proposals nearby. Currently there is an application to extend Pinewood Studios on the western side of Iver Heath, and if implemented, it will mean further removal of a large area of Green Belt in favour of intensive – and in our view inappropriate – development. See plan overleaf. HS2 is taking a significant amount of land out of the GB and CVRP north of the M40 and as previously noted there is another proposal for an MSA on the western side of the M25 near the main HS2 construction site. To the south, the proposed expansion of Heathrow Airport will remove 1,300 acres of land from both the GB (900 acres of it

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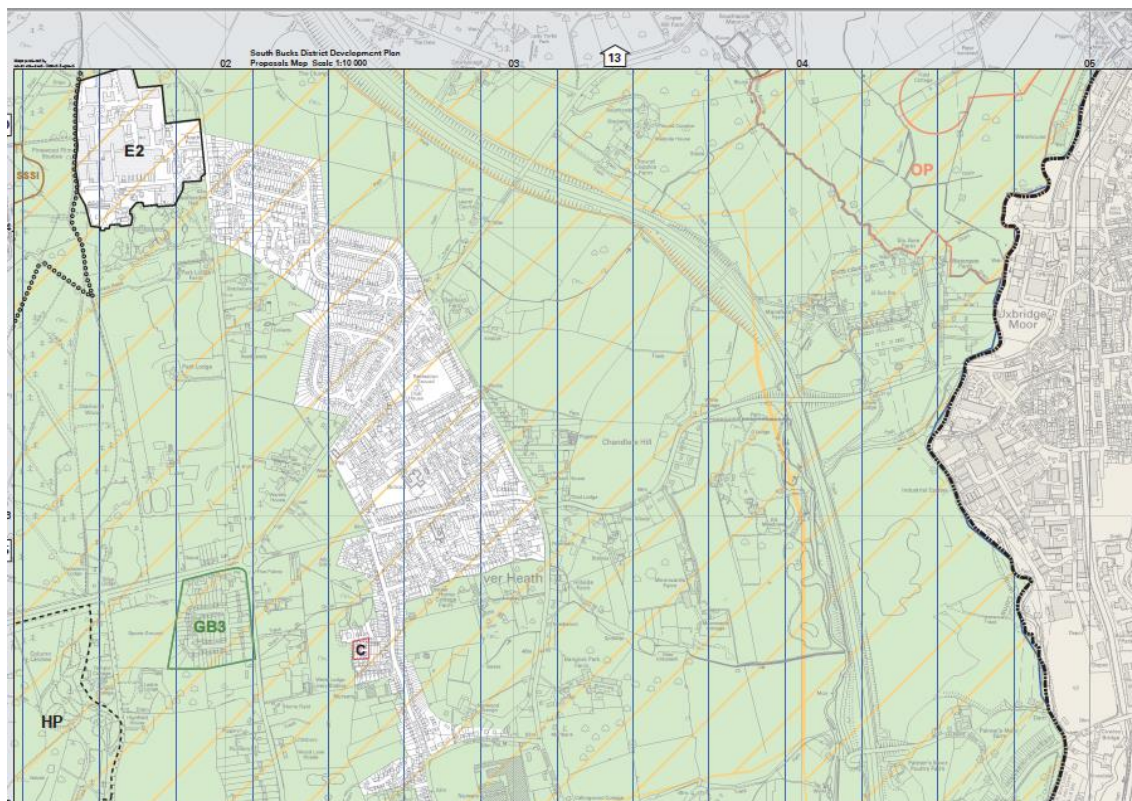
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directly from the CVRP). The strategic function of the GB in separating Greater London from smaller settlements in this western sector is being eroded by cumulative developments and will threaten the purposes of the Green Belt to the detriment of its fundamental function.

In terms of the impact on the openness of the Green Belt, consideration should be given to reducing the size of the sprawling car park and if necessary, halving its size and creating a two-storey car park sunk into the landscape. Thus, the overall site area can be reduced, and its impact on the openness of the countryside substantially mitigated.

The scale of land-take of 46 hectares is significant. The impact can be seen in the maps below.



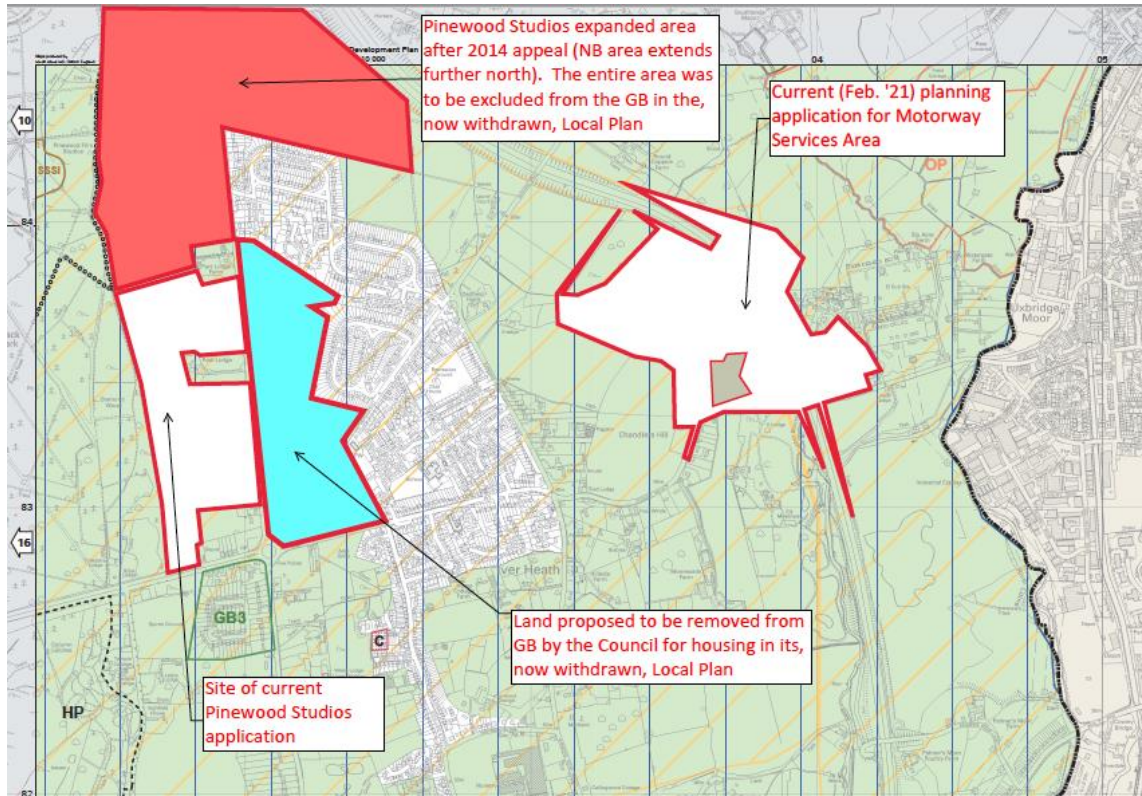
Extract from the South Bucks Proposals Map.

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Plan showing the impact on the Green Belt should Pinewood and this proposal go ahead.

NPPF Para, 138 includes the following (our underlining):

“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

We argue that if the decision maker in this case is minded to accept the Very Special Circumstances for such a strategically significant development, it is incumbent on that decision maker to consider how to foster the beneficial role of the (remaining) GB as part of offsetting the harm associated with the development.

Notwithstanding that view, we are in no doubt that national and local planning policy require that, if approved, a wide approach to mitigation is necessary to offset the harmful impact and conflict with GB policy caused by the sheer scale and nature of this proposed development.

The CVRP plays a critical role in promoting the beneficial use of the GB in this area, hence its desire to be party to any mitigation package that would come into play if permission is granted.

Good planning must prevail and key issues relating to the beneficial future of the GB and CVRP not overlooked when an ad hoc planning application for such a major development is submitted.

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The extent of the harm arising from the scheme

This development will have a significant impact on rights of way, loss of woodland, hedgerows and biodiversity. Replacement takes years and is likely to fundamentally damaged by the proximity of a noisy 24-hour facility as proposed. The visual impact will remain for a considerable period before the new planting matures, to the detriment of local residents and users of the countryside and, of course, it will be worse in winter. Security fencing will further harm connectivity for wildlife.

Paths Iver FP5 and Iver BW32 as they currently exist constitute the only north-south countryside recreational route in the immediate vicinity of Iver Heath. The proposed development would destroy it – the suggested diversions would be unattractive and unpleasant. The permissive right of way for pedestrians, cyclists and horse riders over the motorway on the existing farm bridge is welcomed, since it would improve connectivity between Uxbridge and Iver Heath. There will, however, be uncertainty because of its permissive nature. A high-quality mitigation package of additional walking and cycling routes should be integral to the development. Use of the farm bridge could create a cycling and walking route stretching from Uxbridge towards Black and Langley Country Parks through the countryside.

There will be a reduction in air quality leading to nitrogen deposition adversely affecting the health of vegetation; 24-hour lighting and noise will cause harm to birds, bats and small mammals. The development will have an impact on biodiversity – Great Crested Newts and a range of other species such as Common Toads are located at Iver Environment centre immediately adjacent to the development.

Replacement of woodland and hedgerows is only as successful as its regular maintenance, and will require supervision and commitment to ensure its success. Many schemes such as this have failed due to inadequate watering and maintenance. This, together with factors such as reduction in air quality, noise and lighting, will make the promise to exceed the 10% biodiversity enhancement requirement difficult to fulfil.

Part of the Alderbourne catchment flows under the motorway west to east. On the eastern side of the motorway it is proposed to extend the culvert where the access slip roads will be built. In the current wetter winter conditions the stream has flooded most of this site. This is not an unusual occurrence. Culverting will exacerbate this flooding. The Environmental Statement reports concerns that the stream will also be vulnerable to pollution events from run-off, siltation and invasive species. It is good practice to avoid additional culverting, and buffers should be provided between the development and watercourses to avoid damage from run-off .

The green roofs and commitment for on-site electricity generation through solar panels is welcomed. However, grey water recycling for toilet flushing and irrigation should be used together with other green measures and tools.

This application involves the loss of 46 Ha of productive farmland. This will have a significant impact on both the operation and viability of the existing farm.

The impact on Iver Environment centre alongside this development will also be severe. Potentially impacting their access road and their ability to run courses for children and adults with learning difficulties on this valuable community facility. The application does not recognise any impacts on this facility.

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The scale of mitigation needed

We summarise below the categories and general scope of mitigation needed, but these should be taken only as headlines. We have heeded the tests of mitigation being:

- a) Necessity to make the development acceptable in planning terms
- b) To ensure they are directly related to the development; *and*
- c) They are fairly and reasonably related in scale and kind to the development

The sheer scale of this scheme and its impact on the GB and CVRP means that mitigation must be commensurately significant and extensive.

But, before this comes into play and if the scheme is to proceed further, its layout must first be modified to create a 'greener', less intrusive, development reducing its impact on the openness of the GB.

The categories and scope set out below have, in part, been informed by the 2019 Colne and Crane Green Infrastructure Strategy – where this applies appropriate letters in **Blue** are included to cross-reference (found on pages 28-30 of the Strategy).

Area-wide Improvements to promote active travel and biodiversity

- a) A blend of identified projects and a substantial fund (at least £2m) to be applied within 3km as the crow flies from the development.
- b) Projects to include are ones aimed at
 - Improving active travel links, enhanced walking and cycling links in the local area including the Colne Valley Trail (**A,MC101**)
 - Reinstating a productive landscape (**Y**) in this area,
 - Farmland biodiversity enhancement (**S**)
 - Developing links with the education sector with links to the Iver Environment Centre adjacent to the eastern side of the site (**Q, MC001**)
 - Water quality and river habitat improvements (**L, LN, MC201**)

Area Wide Management and Maintenance

- c) An annual fund of £25k for 25 years from commencement of the development, to fund a CVRP Countryside Management Service (**P, R, X**), to care for the area around the site whilst fostering community engagement. For example, on land outside the red line including woodland and ancient woodland mentioned in the application where enhancement measures are proposed.
- d) This could link to a 'green team' to add an employment/training angle (**Q**) and deliver on other objectives e.g. Biodiversity and link with partner organisations (such as Black Park, Iver Parish). It would assist with the improvement of road corridors to retain and re-create the countryside feel (**Z**).

Biodiversity Net Gain of in excess of 10%

- e) Details as agreed with the Council's Ecology Officer

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Conclusion

The CVRP fundamentally objects to this application on the basis of the considerable harm it would cause to this part of the Green Belt and the Colne Valley Regional Park. It considers the cumulative impact of this and other schemes will have a detrimental impact on the strategic Green Belt at the narrowest part of the designation, harming its very purpose.

The CVRP questions the rationale of locating the development in this highly sensitive area.

The CVRP questions whether the application meets the NPPF requirements and those of Climate Change legislation.

The CVRP notes this is one of three current proposals for MSAs in this quadrant of the M25. If this development is approved, it will petition to have the applications called in by the Secretary of State for decision.

The CVRP objects to the loss of productive farmland, and the harm caused by the loss of significant amounts of woodland and hedgerows to local biodiversity.

If approved, the scale of mitigation required for this MSA would be far in excess of what is proposed in the planning application.

All these issues indicate this is the wrong development in the wrong place.

Regards

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Managing Agent

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