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

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



November 2021

Dear Ms Aston

CVRP's response to PL/21/3644/FA

Northern Part of Former Woodlands Park Landfill Site, Land south of Slough Road, Iver Heath

Construction and operation of a 57MW battery storage facility, landscaping, fencing and extension of access track.

Summary

This application is on Green Belt and within the Colne Valley Regional Park (CVRP). The CVRP is recognised by the applicant but apart from tree planting does not acknowledge that the development will cause damage to the Park caused by the loss of land and loss of openness across the valley floor contrary to the Park's six objectives. Consequently, should this application be approved, compensation for the loss of land and mitigation for the loss of part of the Regional Park will be required. The CVRP will be happy to discuss what form this mitigation should be included in any \$106. For an indication of what is expected please see below.

The application

The applicants appear to demonstrate that the application should be approved due to the content of the National Policy Statement on Energy. We recognise that energy production and consumption should be as efficient and as carbon free as possible. However, this proposal appears to cater for the 'what if' eventuality. Indeed, the applicants state that the site will revert to agriculture after 30 years. This period is too long to be considered for a temporary planning permission and that is not what is being applied for. Surely a more permanent location would be a more secure way of storing electricity for the future?

Why cannot this development be located on one of the nearby industrial estates – no reason is given for siting it on open land. The criteria given to the commercial agent appeared to focus entirely on price which in this area of the southeast is totally unrealistic.

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It is also noted that an application for similar development has recently been approved close to the junction of the A40 and the A413 only 3 miles from this site. How many sites are required for this kind of development?

The applicants also state that as this area of the Green Belt is between the M25 and the River Colne – the boundary between the London Borough of Hillingdon and Buckinghamshire - that it does not perform well as GB. It is our position that this area of Green Belt separating the Ivers and Uxbridge is crucially important in terms of separating London from the villages of Buckinghamshire and goes to the heart of what the purposes of the Green Belt are for.

This strip of land along the Colne Valley stretching from Staines to Rickmansworth has been part of the CVRP since 1965. It is now experiencing an existential threat from development which sees this part of the Green Belt as available. We currently have major development from HS2 happening in the north of the Park, proposals for 2 Motorway Service areas (yet to be determined), a potential data centre to the south of this site, potentially expansion of Heathrow and multiple other major development proposals. It should be noted that national and local planning policy that GB should be protected has not changed.

It is worth noting that other applications for infrastructure within the GB and the CVRP have been refused on appeal due to the unmitigated impact.

For these reasons we are not convinced that the Very Special Circumstances to locate the development in the Green Belt and within the Regional Park have been met. We therefore object to the proposal.

Mitigation: If this development is approved, opportunities must be taken to mitigate the impact on the Green Belt and the Colne Valley Regional Park in the vicinity of the development site through a Countryside Management approach that provides benefit to local people, biodiversity and the landscape. See the Colne Valley Green Infrastructure Strategy () with particular reference to the:

- Vision and key principles on pages 7-9
- Whole area schedule of opportunities on pages 28-30
- Mid Colne sub area on pages 42-49.

The CVRP will be happy to discuss what form this mitigation should be included in any S106.

Jane Griffin

Trustee Colne Valley Regional Park