

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



June 2022

Dear Sir/Madam

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

The Colne Valley Regional Park (CVRP) has carefully reviewed the amended submission. We note certain minor, positive changes<sup>1</sup>, but consider that these fall well short of the fundamental change that would have been necessary in order to meet the significant concerns previously identified. Further, they do not address the points raised by the CVRP or the call for mitigation in our responses of February 2021 and August 2021. [We regard this as very much a missed opportunity and hope that it will be possible to reconsider in the light of the points below]. However, in the absence of such amendments **the CVRP therefore maintains its position of objecting to this intrusive and damaging development in the Green Belt.**

**Specific issues of concern**

*Iver Environment Centre impact*

Contrary to what is stated in the ecological report: Great Crested Newts are located at Iver Environment Centre. This has been confirmed in a study by Wildwood Ecology and should inform the ecology report, site design and mitigation. In addition. There is no reference to the impact of slip roads on Iver Environment Centre. Mitigation for the Centre is critical as part of a package to address the direct and significant impact the development would have on the Green Belt (GB) and Colne Valley Regional Park.

*Insufficient consideration of biodiversity needs*

The developer pledges to provide new woodland and wildflower meadows to contribute to Biodiversity Net Gain. It should be recognised this planting will not contribute positively to biodiversity and screening from Iver Heath for a considerable time. There must be a clear plan and appropriate resources for its management in perpetuity, ideally allocated to a local environmental or community organisation.

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<sup>1</sup> For example, land-take has been significantly reduced due to National Highways dropping the idea of creating a Smart Motorway in this location.

**Colne Valley Park Trust**  
Charity Registration Number: 1181303  
**Colne Valley Park Community Interest Company**  
A company limited by guarantee. Registered in England. Company No. 08131867

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*The need for less intrusive development*

If the scheme is to proceed further, its layout and building design must first be modified to create a 'greener', less intrusive, development. This needs to incorporate excellent permeability across the site as part of an off-road green link between Uxbridge and Iver Heath/Black Park/Pinewood for walking and cycling, set within generous green infrastructure corridors. We welcome the proposals for public access over the motorway contributing to a link between Uxbridge and Black Park, albeit that this is still only on a permissive basis.

*Flooding issues and the proposed culvert of the Alderbourne*

We agree with the Environment Agency's objection to the proposed culvert of the Alderbourne because of the impact this would have on the biodiversity of the river, and that it would not be compatible with the Water Framework Directive.

The application states – wholly incorrectly – that there is no flooding on the east side of motorway. In fact, the field beside the Alderbourne regularly floods throughout the winter. The Council and the developers must also consider what impact the removal of huge quantities of sand and gravel from the main site will have on the hydro geology of the wider area.

**Warren Farm MSA Inspector's report and the Green Belt.**

The Warren Farm appeal decision is quoted extensively in the developer's amended submission, where the Inspector felt that Iver Heath was a better site [than Chalfont St Peter] for an MSA.

In Green Belt terms – somewhat surprisingly – the inspector does not regard Iver Heath as a built-up area, concluding the impact on Green Belt between Uxbridge and Iver Heath would be minimal. We consider this to be fundamentally wrong, not least because it is directly contrary to the 2018 Arup Strategic Green Belt review for the former South Bucks & Chiltern Councils. This area was categorised as part of the coherent 'London Fringe' zone. The report highlighted the characteristics and sensitivities of the part of that zone including 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 protecting the merging of the major urban settlements of Greater London and Slough..."*

*" ... any change within this area could act to significantly compromise the role played by the Green Belt in maintaining separation between these two large urban settlements."*

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We agree with the report's assessment in 2018 and see no reason to depart from it in the context of the proposed MSA.

### **Cumulative impact on the Green Belt**

The CVRP is conscious the development demands being placed on the Green Belt in this part of the Regional Park are both individually, but also cumulatively, very significant. Unless government policy is reversed – and there is currently no prospect of that happening – the Green Belt remains a core tool of the country's planning system, particularly in the absence of a Buckinghamshire Local Plan and **a positive vision for the future of this increasingly threatened part of the Green Belt.**

It is essential that the current application is seen in the context of the cumulative, substantial proposals submitted for the area including Pinewood expansion, Data Centres and battery storage areas. A cumulative impact assessment must be carried out. We recognise that with different proposals at different stages of the planning process it is challenging, but **the Council must rise to that challenge, be proactive and implement a positive vision for the future of this increasingly threatened part of the Green Belt,** even if it is through its handling of individual applications, rather than through a Local Plan. **The Colne Valley Regional Park is important for people, wildlife and food production. It is an area of the Green Belt that must not be whittled away by a series of ad hoc decisions.**

Our strong view is that with each significant incremental step to develop land in the Green Belt, the harm caused to it overall increases rapidly. In this case, while the proposal itself is very substantial and will have a significant impact, it must also be assessed as part of the cumulative changes to date that have led to the deterioration to the Green Belt from the baseline set when it was designated. Should the Green Belt become so urbanised compared with the baseline, its integrity will be seriously – quite possibly fatally – compromised. The Iver Heath area is at that turning point.

### **Mitigation and the Green Belt**

Once Green Belt is defined, NPPF Para 145 requires 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.”*

It is well established that the natural environment and recreation opportunities provided by the Green Belt offer a critical physical and mental health resource for the wider population, as well as being important for wildlife and food production. Its protection and enhancement for the long term is fundamental to the role of the CVRP. Once that resource is lost to development, it is lost forever. This flags the importance of there being a scale of mitigation proportionate to that of the development and the harm arising from it.

NPPF Para, 142 includes the following (our underlining):

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*"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 [contrary to the points set out in this and our previous submissions, and in the absence of the fundamental changes to address them] Buckinghamshire Council is minded to accept the Very Special Circumstances for such a huge development, it is incumbent on the authority to consider how to foster the beneficial role of the (remaining) Green Belt as part of off-setting the harm associated with the development. NPPF para 142 provides a framework for that in a manner consistent with the positive approach to existing Green Belts by local planning authorities, called for by government NPPF para. 145.

Good planning must prevail: even if the decision-maker considers there to be a persuasive case for the development, the level of mitigation proposed falls a long way short of what would be needed to outweigh the harm identified arising from the fundamental inappropriateness of this large development. Applications like this require a total change of approach and, until that is achieved, we cannot see that on any reasonable view the "very special circumstances" test could be considered to be satisfied.

In this context we would refer the local authority and the developer to the call in our submission in of February 2021 for mitigation to address the impact of this development on the Green Belt:

- Area-wide improvements, informed by the Colne and Crane Valleys Green Infrastructure Strategy (including at Iver Environment Centre as part of a wider landscape-focussed approach)
- Area-wide management and maintenance, including a Countryside Management Service to operate in the areas of the Colne Valley Regional Park around the development.

Yours,



Stewart Pomeroy  
Colne Valley Managing Agent

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