

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



July 2022

Dear Sir/Madam

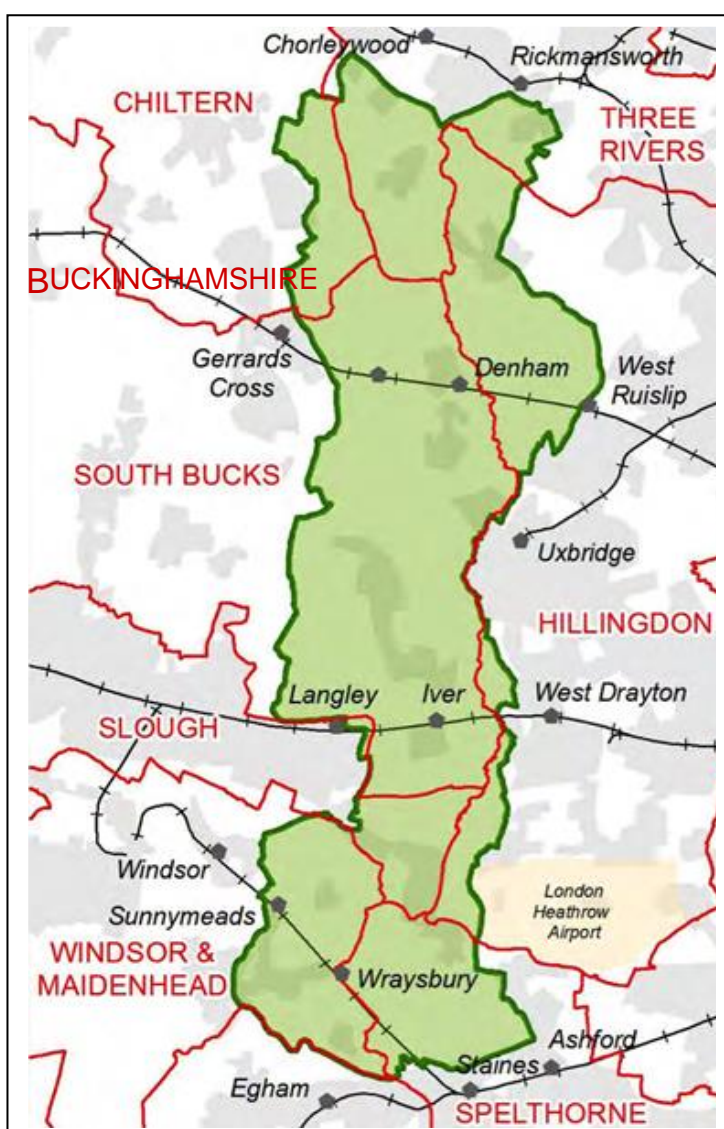
PL/22/1411/0A

Response to proposed Motorway Service Area on land between junctions 16 and 17 of the M25

**This response is from and behalf of
The Colne Valley Regional Park**

The Colne Valley Regional Park was founded in 1965 when local authorities – including Bucks County Council – showed great foresight in agreeing to work together to preserve and enhance this precious area for recreation and nature conservation.

It is supported by more than 80 member organisations including local authorities, businesses, residents' associations, environmental charities and user groups. Groundwork South acts as the Park's managing agent.



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

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

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The Colne Valley Regional Park has six objectives:

<https://www.colnevalleypark.org.uk/whats-special/>

Landscape

The Colne Valley Regional Park (CVRP) covers eight local planning authorities. As a result, the valley is rarely, if ever, considered at a landscape scale.

The creation of a Green Infrastructure Strategy <https://www.colnevalleypark.org.uk/green-infrastructure-strategy-downloads/> for the Colne Valley Regional Park aims to bring the green and blue on the map to the forefront of planning policy and decisions, and feature the landscape of the Valley as a whole, rather than from the perspective of its various council boundaries. These boundaries are an administrative convenience – they don't exist as real barriers to people and wildlife. The Crane Valley has been added to this strategy to provide a truly landscape-scale picture of the area.

This cross-border approach is entirely consistent with Green Belt policy in the National Planning Policy Framework.

Summary of response

The whole site is within the Colne Valley Regional Park and Green Belt.

National policy states that the Government attaches great importance to Green Belts (para 137 of the NPPF). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

This application proposes large scale development (35.88 hectares) in the Green Belt separating Chalfont St Peter and Maple Cross. The site, mainly on the eastern side of the M25, is directly adjacent to HS2's construction site creating the new tunnel under the M25 currently used for stockpiling soil and other material but will ultimately revert to agriculture in the restoration scheme (Western Valley Slopes) to which the CVRP has been party to, as a founder member in the working group.

The development conflicts with National Green Belt Policy unless Very Special Circumstances are proven. The applicants suggest that their scheme is in the best location to deliver government policy on MSAs. However, it should be pointed out that other alternatives to this site have either been considered or are under current consideration.

Para 145 of the NPPF states that Local Authorities have a duty to protect and enhance the GB:

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'Once Green Belts have been defined, local planning authorities should 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.'

Buckinghamshire Council should therefore support the CVRP in delivering its six objectives which are consistent with this paragraph and not allow further development in the Green Belt. Where development in the Green Belt is considered necessary, substantial compensation and mitigation should be provided to benefit the Colne Valley Regional Park in perpetuity.

The CVRP **objects to this application** as no compensation and mitigation has been provided. Indeed, in a number of respects in terms of biodiversity, the landscape, loss of agricultural land and access to recreational routes, the application conflicts with our objectives and is entirely inconsistent with the aims of the Regional Park. It creates actual harm.

This site (unlike the previous proposal) is visible from across the valley and additional lighting will make it even more prominent, detrimental to both the landscape, long views and the biodiversity of the Regional Park.

As a founding member of the HS2 working group, the CVRP has been party to the restoration plan for the HS2 site by increasing recreational opportunities and enhancing rights of way, including the Old Shire Lane Circular Walk. This site is bounded by both Old Shire Lane and the South Bucks Way, a long-distance footpath. The development will create a noisy, brightly-lit environment which is not conducive to the peaceful enjoyment of the countryside. In addition, it would be surrounded by high security fencing, further urbanising its appearance and alienating the public on nearby rights of way.

Old Shire Lane has historical significance, thought to have been the boundary between the ancient Saxon Kingdoms of Mercia and Wessex, and it now forms the county boundary between Hertfordshire and Buckinghamshire. This significance has been completely ignored by the applicant.

The applicant is proposing mounds – of uncertain height – to separate rights of way users, including horses and their riders, from the MSA. This is a very crude and highly unsatisfactory solution, and a more creative approach is required.

It is also possible that litter and fly-tipping will be an issue.

In terms of BNG, the applicant proposes improving the leftover land from the development and planting trees, wildflowers and hedgerows (on the western side). We consider this inadequate, and support the Council's ecology officer in seeking improvements within the site boundary and particularly on compensatory land.

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Loss of Green Belt land requires compensatory improvements to the environmental quality and accessibility of remaining GB land (para 142 of NPPF). That currently proposed is insufficient and demands a far wider scale of mitigation. The applicant should be advised by the Colne and Crane Green Infrastructure Strategy in this regard.

The CVRP does, however, welcome the reduction in size and the omission of the hotel from the previous scheme.

The proposal in its current form is therefore inappropriate, demonstrably harmful to the Green Belt, and is not justified by Very Special Circumstances.

Jane Griffin
Director
Colne Valley Regional Park

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