

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



October 2022

Dear Sir/Madam

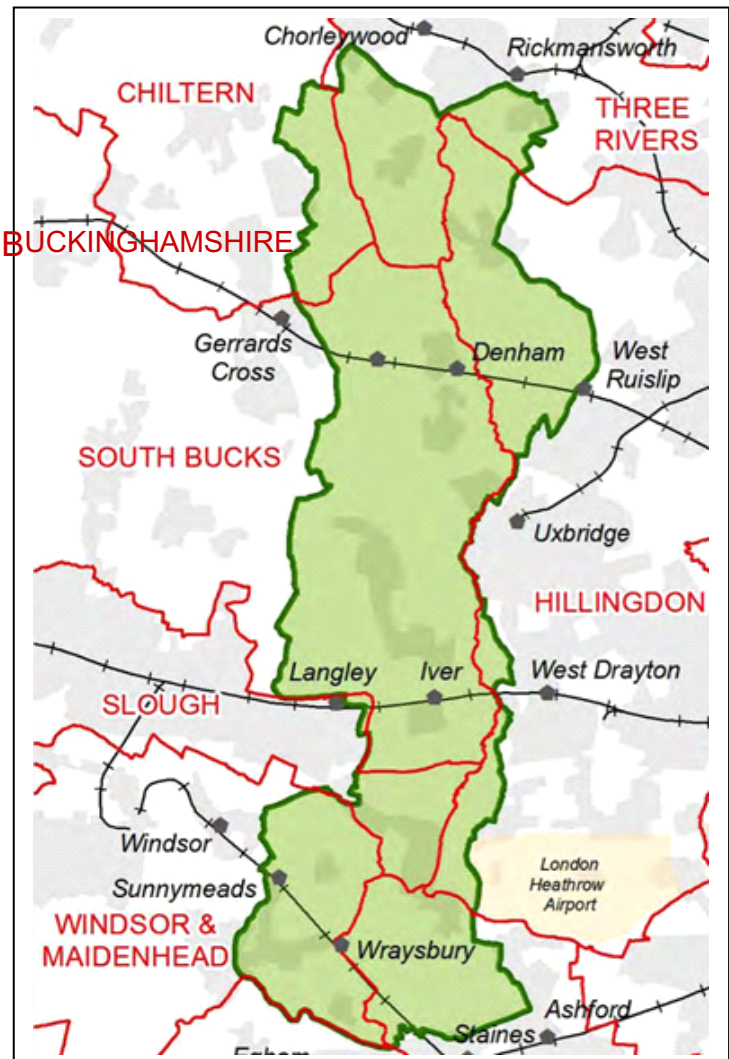
PL/22/3491/OA

Response to proposed Woodlands Park data centre

**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 six 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 (52.4 hectares) in the narrow strip of Green Belt separating Uxbridge, in the London Borough of Hillingdon, from Iver and Slough. Due to its width, this strip is considered to be of strategic significance and these plans adversely affect encroachment, sprawl and openness in direct conflict with National Green Belt Policy. In addition, the Planning Statement suggests that because of this development the boundary should be moved to the M25 to the west of the site. This boundary change would of course allow development between the urban area and the M25, not only in this location, but throughout the Colne Valley particularly threatening Denham in Buckinghamshire.

Approval of this scheme would set a clear precedent for more data centres or similar if the developer's assertion that very special circumstances justify this being the only possible location, threatening the remaining GB corridor and the 56-year-old Colne Valley Park.

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

P145.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 6 objectives which are consistent with this paragraph and not allow further development in the Green Belt.

The application is contrary to Core Policy 9 which states that sites within the CVRP urban/rural fringe should support and implement CVRP initiatives. This development does not do that, in fact no mention is made in the supporting documents that the site is within the Park or that there is a policy initiative to mitigate and compensate in CP9.

The developers have not justified that GB land is the only option for this development and have not apparently carried out an exhaustive examination of possible employment sites both within Buckinghamshire and along the M4 corridor to take advantage of superfast fibre connections.

It seems they fail to realise that GB policy is not a landscape policy, consistently justifying their development by referring to the degraded former mineral excavated land. Mineral extraction is a permitted use in the Green Belt. This description would apply to the whole of the CVRP which is characterised by attractive and highly popular lakes formed by previous mineral extraction.

The developers also refer to an appeal decision for employment land in the Green Belt relating to a previously restored colliery site. The two sites are not comparable.

In terms of BNG they are only proposing up to 5%, far below the now accepted target of at least 10%. No details are supplied to explain why this is half of what is required.

The impact on the Park is significant in terms of the visual impact of 23m-high buildings, loss of countryside, impact on an established wildlife corridor, and urbanisation of the existing regional rights of way, including the National cycle trail, the Colne Valley trail and the London loop.

The offer of 45 acres of land to form publicly accessible land within the CVRP fails to realise the six objectives of the regional park on a landscape-scale (see Appendix A for recommendations from Groundwork South on how mitigation could deliver the objectives of the Colne Valley Regional Park in and around the development site). The developers also refer to it as an extension to the Regional Park. This demonstrates a fundamental misunderstanding of Park's boundaries.

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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 proposed on the 45 acres is insufficient and demands a far wider scale of mitigation.

In traffic terms, should the MSA to the north and the battery storage application be allowed, then Slough Road is entirely unsuitable for three major developments to be constructed to a similar timescale. The traffic chaos would affect the whole of the Ivers, thus having a negative outcome on air quality contrary to the AQMA. It would also have serious negative impact on a principal western access route into Uxbridge, carrying not only domestic traffic to the town centre, but lorries and vans requiring access to the industrial estate off Rockingham Road.

The proposal is therefore inappropriate, harmful to the Green Belt and is not justified by Very Special Circumstances. However, should permission be granted we outline what we would wish to see in terms of mitigation in the Appendix consistent with para 145 of the NPPF.

Details

The development is speculative with no designated end user. The developers state that the data centres would be suitable for the major tech companies, although these companies normally build their own.

The GB designation obviously affects the land value, as does the contamination. Is this the reason the land has been selected? Because it is cheap?

The applicants state the development will cost £1bn. £20m is offered for education purposes and £1m to the Colne Valley for maintenance of the 45 acres given over a 30-year period. In terms of the severity of the impact on the environment this appears to be entirely the wrong way round.

The district heating system offer would serve nine houses, not the 3,000 they suggest. There are no other houses in close proximity. Again, this indicates that this is the wrong location, and this offer is hollow.

The site – although poorly restored from its mineral extraction period and then infilled with hazardous waste from the former Cape Boards factory which used asbestos – is currently used as rough pasture, and forms part of the wildlife corridor stretching down through the Regional Park. All trees would be removed as part of this development. The current open land is a valuable part of the Park.

Construction on this land could negatively affect the hazardous waste and could threaten the water quality of the Rivers Colne and Colne Brook.

Two rights of way cross the site from west to east. To the north of the site the Right of Way follows the Colne Brook, and to the south the ROW including National Cycle

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Network and the Colne Valley Trails follow the line of Palmers Moor Lane. This development will fundamentally change the experience for users of these ROW.

The height of the proposed buildings will ensure they are visible from a considerable distance. This will have a grossly negative impact on the character and appearance of the landscape of the Regional Park to its detriment. This is measured as a minor beneficial impact in the developer's assessment. We completely disagree.

In addition, the site would be surrounded by high security fencing further urbanising its appearance and alienating the public on nearby ROW.

Appendix A: Mitigation recommendations from Groundwork South October 2021

Groundwork South is the Colne Valley Regional Park's (CVRP) managing agent. It makes the points below independently of the Park's position of opposition to this development proposal which is within its boundaries and the Green Belt. Groundwork South sets out the mitigation that will be required by the CVRP in the unlikely event the development is approved.

This must not be construed as indicating CVRP support for the development.

The six objectives of the CVRP 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.

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Requirements for delivery of these objectives:

Landscape & Countryside

Woodland and hedge planting for visual and noise screening from M25

Use of historical maps to inform locations of hedges, ditches etc

Vegetation planting and management to screen views to the development area from nearby paths and roads including (but not limited to) the footpath on the east of the River Colne, footpath on the north of the Colne Brook, proposed paths to the south of the development and the route of the National Cycle Network/Colne Valley Trail along Palmers Moor Lane and Iver Lane. This can be done within the developed area, its security fence and on the land around it.

The above should be achieved in a way that does not fragment the sense of the wider landscape and designed in parallel with a funded strategy to maintain and create long reaching views, from the paths and roads listed above, that give a sense of the countryside/green space setting of the Colne Valley Regional Park.

The effect on long distance views needs to be explored, including those from vantage points further north in the Colne Valley.

Boundary treatment to design out undesirable uses – flytipping, motor/quad bikes, illegal encampments etc – yet still allow legitimate access.

Incorporate SuDS into design of development.

The Colne Catchment is hugely water stressed. Therefore, the construction and operation of the buildings (including any green walls and green roofs) should be as water efficient as possible.

Biodiversity

River Colne Habitat corridor. In channel works to improve and encourage natural flow processes including the use of woody debris. Tree works to create a balance of light and shade.

Creation of on-line and off-line backwaters, channels and ponds to create habitat/refuge for a wide variety of species including water voles, dragonflies, amphibians, fish etc. Locations for backwaters to be informed by the former ditches and the former western branch of the Colne, the southern end of which is still present on the ground.

Tackling invasive species – particularly along the Colne including an annual programme of removal and control of floating pennywort and Himalayan Balsam.

This will form part of a wider control strategy for the Colne Catchment.

Habitat enhancements and structures targeted at specific species eg reptile hibernacula, bird and bat boxes, bug ‘hotels’ etc

Discouraging public access from some areas (locations to be informed by results of habitat and species surveys) e.g. the area to the west of the Colne and north of the existing bridge.

Take opportunities for complementary land management for biodiversity with adjacent landowners e.g. Highways England, land to north, land to South West.

Survey biodiversity, water quality and depth profile of lake to the west of the Colne and Woodlands lake. Improve as appropriate e.g. create gentle sloping sides

Understand and address any impact of the northern access road on the Colne Brook, surrounding habitats (and footpath)

Ecological mitigation/biodiversity need to be independently monitored. There should be a specific budget allocation for this.

Recreation

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Designate the east to west path across the southern part of the site as a Public Right of Way. Use this as an off-road connection for the Colne Valley Trail (and NCN) avoiding Iver Lane

Consider best location for this path in terms of connection to rights of way network, length, attractiveness/countryside setting, avoiding under power lines.

The location of the access road should be achieved so that there is only one road crossing for the east to west path, rather than two in close proximity as shown on the 'regional park extract' map 21091.017. This can be done by the new access road branching off Palmers Moor Lane further north than in the location depicted on map 21091.017.

The current Colne bridge location is poorly placed in terms of connection to the wider path network. It is adequate for those coming from the north, but not suitable from the east or south.

Address the connectivity issue from the east and south by creating a short path from Iver Lane on the west side of the Colne (common land: Clisby's Bridge mud wharf) then linking this to the proposed east to west path. Create this linking path as a cycle path to enable an improved route of the National Cycle Network 61/Colne Valley Trail via an off-road countryside/green setting avoiding Iver Lane and the southern part of Palmers Moor Lane.

Install a pedestrian and cycle bridge over the Colne to provide safer crossing of Iver Lane for cyclists coming from the east

Engage with neighbouring landowner(s) to the South East to create access path into the site linking to/from footpath IVE/29/1. This will better connect the site into the rights of way network in the CVRP and enable a variety of circular walks to be taken around the site, Huntsmoor Park, Little Britain and the Colne.

Retain the lake and the fishery in the middle of the development area. Fund production and implementation of a management plan for mutual benefit of the fishery and biodiversity.

Retain and enhance fishery on the east bank of Colne (leaving the west bank for biodiversity)

Rural Economy

Use conservation grazing to manage grassland areas. Install stock fencing, corrals, water, shelter belts, vehicle access plus allow for graziers' costs.

Use local agricultural contractor for annual 'cut-and-take' of meadow/grassland areas

Use Colne Valley 'Green Team' for ongoing site management

Community Participation

Recruit, train and support voluntary cattle checkers.

Recruit, train and support River Rangers to monitor, survey and report on condition of the river and backwaters

Engage local communities with the site through conservation tasks and guided walks through the site and surrounding paths. Train volunteers and support them on species surveys and to assist with site management.

Countryside Management

To ensure the site links in with its surroundings as part of its context within the CVRP there are opportunities for delivery of the Colne Green Infrastructure Strategy in the vicinity of the development site. See the Colne Valley GI strategy with particular reference to the:

- Vision and key principles on pages 7-9

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- Whole area schedule of opportunities on pages 28-30
- Mid Colne sub area on pages 42-49.

Specific opportunities include (but are not limited to):

- Improve surfacing, signage, landscape and promotion of the Colne Valley Trail (Colne GI Strategy project A and MC104)
- Create cycle route on north side of Iver Lane between the Colne and Canal. Connectivity for CVT/NCN and the site avoiding a route along the road carriageway (A & MC104)
- Improve Water Quality including monitoring (project I) and mitigate pollution (project N)
- Invest in annual control measures of invasive species on rivers in the central part of the CVRP (project I) and improve riverside biodiversity (project MC201)
- Species and habitat enhancements (projects V), MC
- Improve access to the countryside for Iver residents (project MC105) including: Resources made available to CVRP or Buckinghamshire Council for an independent options appraisal for re-creating the footpath IVE7 crossing under M25:
 - Improve canal-sides adjacent to the development site (projects W and MC106)
 - Improve roadside 'public realm', sense of countryside/place and improve countryside/waterway views for travellers along local roads, pavements & footpaths via car, bus, bicycle or on foot (MC204)
 - 'Green team' of conservation trainees undertaking biodiversity, access, landscape and 'public realm' enhancements whilst improving employability training and skills development for local people. (projects X and Z, MC204,MC208)
- Engage communities in the above including via Iver Environment Centre (projects P, R and MC001)

The above Countryside Management requirements must be funded from 1st spade.

Management and maintenance

Site to be handed to CVRP with all biodiversity, path, landscaping and infrastructure works completed.

The CVRP would need a lifetime indemnity that it is not responsible for any future liabilities relating to contamination from the landfill. Legal advice would be needed which could be reasonably simple. The developers should pay for (reasonable) professional expenses for this and legal work relating to the transfer of land.

There will need to be adequate funding to cover:

- staffing, training, HR, admin support, community engagement etc.
- purchase, maintenance and replacement of equipment and running costs,
- office/staff welfare facility on site,

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- budget and allocation for repair and replacement of structures over time.,
- requirement for specialist expertise given the nature of the site and its historic uses.

The management and maintenance and countryside management will require up to £1m per annum for a period of 25 years
Resources will need to be invested to ensure management and maintenance can be funded in perpetuity beyond the 25-year period.

The application as it stands conflicts with our objectives, is inconsistent with the aims of the Regional Park, and causes substantial harm to the Green Belt and, in turn, to the Regional Park.

Buckinghamshire Council should therefore support the CVRP in delivering its six objectives by refusing this application or by promoting substantial mitigation and compensation in line with the Colne and Crane Green Infrastructure Strategy.

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