

May 2023



**PL/20/4332/OA Outline Application for a Motorway Service Area between Junctions 15 and 16.**

The Colne Valley Regional Park is increasingly concerned that this application will be recommended for approval now that National Highways has removed its holding objection.

As clearly set out in our previous responses, this outline application is harmful to the Green Belt in this very sensitive strategic location and to the Colne Valley Regional Park and its six objectives. The proposed mitigation measures are grossly insufficient given the scale of development and fail to meet the requirements of the policies detailed below.

We believe that the following relevant planning policies prohibit the granting of planning permission as currently proposed.

In particular, the NPPF paragraphs – para 145 on the need for green infrastructure and biodiversity improvements; para 154 on climate change in particular in vulnerable areas where risks should be managed through suitable adaptation measures, including through the planning of green infrastructure and importantly in the new guidance on Local Nature Recovery Strategies published in March 2023 para 82 (regarding nature recovery and public access to nature) which does not appear to have been taken into account in this application, which was submitted prior to the guidance being published.

The Ivers Neighbourhood Plan has been adopted since the application was submitted. Policy IV 13 is pertinent and should also be taken into consideration.

Of the utmost importance, however, is the issue of land ownership. This land and adjacent parcels are owned by Buckinghamshire and is therefore **public land**. It was purchased in 1938 to be held as Green Belt in perpetuity and **remain undeveloped** to fulfil the criteria of the Green Belt designation. Selling publicly owned land for a motorway service area which could be in a more suitable alternative location which is **not public land**, would be a breach of the trust in which this land is held. It has been farmed for decades at the very least and there is no suggestion that this purpose is no longer viable and/or unneeded. It should be noted that it is very clear from the local

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

community that it believes it would receive few benefits because of this development, and it is therefore not in the public interest.

We would implore you to ensure that the applications are refused for the policy reasons set out above and in our earlier correspondence in relation to this application.

However, if the Council is minded to accept the principle of this regrettable development for a MSA on this site then we call on the council to ensure the application should be revised significantly to deliver commensurate mitigation and compensation:

- An Active Travel route across the site through green space and into Buckinghamshire Council-owned land on the eastern side of the M25 to deliver a cycle and footpath route (not permissive as proposed by the developer) between Black Park and Uxbridge. As per the Colne and Crane GI Strategy and in compliance with the national and local policies mentioned above.
- Benefits to the Alderbourne and its biodiversity for the length of the watercourse within the Park.
- Compensation for the land lost to the CVRP and the potential to deliver benefits in line with Green Belt and CVRP policy and the six objectives of the Park.
- Relocation of the Iver Education Centre to a site no longer significantly blighted by the proposal, at the developer's expense.
- Delivery of a fully funded Countryside Management Service to administer the undeveloped land designated for biodiversity improvements, within the ownership of the developer, in perpetuity.

A more detailed mitigation strategy is appended. We had hoped to discuss this in detail with the developer, but no progress has been made over the last six months.

Yours sincerely

Stewart Pomeroy  
Colne Valley Managing Agent

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