

Jane Griffin MRTPI
Chartered Town Planner

Jerry Unsworth MRTPI
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To: Councillors on the Strategic Sites
Committee

My Ref: JU/JG 26.09.2023

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By email

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Contact: 07880 725247

Date: 26 September 2023

Dear Councillor,

**Re: Iver (Colne Valley) MSA Application - PL/20/4332/OA
Strategic Sites Committee - 28 DSeptember 2023**

As two professional town planners who are both unable to get to the Committee meeting this Thursday, we are writing to you to say that we find that the officer's report provides a narrow interpretation of the relevant policy framework.

The conclusions reached suggest that a different approach to the development is not justified, whereas the degree of harm to the Green Belt (and consequently to the Colne Valley Regional Park) could and should have been assessed quite differently.

The assessment undertaken fails to recognise the 'positive planning' development management approach that is needed for a large-scale development in this particular location, and at this juncture. A 'mechanistic' analysis of impact on the Green Belt has been undertaken, whereas a number of factors point to the need for a very different approach:

- The current policy context, from both the recent Iver NP and the NPPF
- The opportunities associated with this location - if a strategic landscape view of it is adopted - as potentially accessible natural environment, not solely about landscape beauty
- The historical context of this site whereby the land came into public ownership before the war to, broadly, provide the wider community with long term, accessible countryside

Had a different approach been taken very different weight would have been applied to Green Belt harm and the balancing exercise would have identified that a different scheme, with more strategic 'countryside' mitigation is needed.

We attach a concise presentation to convey our thinking and fundamental concerns. A key message is that if the countryside improvement opportunities are not taken now, they will be lost forever. The long-established Green Belt, Colne Valley Regional Park, and your residents, deserve a very different approach.

The CVRP, as an organisation, is also a resource for joint work on major infrastructure schemes (if their principle is to be accepted), to achieve joint goals. After all, the CVRP's objectives are, we believe, supported by the Council which is a part funder of the CVRP.

As well as our presentation we include an annex with a few notes about us.

Jerry Unsworth MRTPI

Jane Griffin MRTPI

Attachment: Powerpoint presentation

Jane Griffin MRTPI
Chartered Town Planner

Jerry Unsworth MRTPI
Chartered Town Planner

ANNEX

Jerry Unsworth MRTPI

Jerry established his planning consultancy in 2014 and, prior to that, worked for 5 Local Authorities, his last position as Head of Planning & Sustainability with Wycombe District Council.

Over the last 9 years Jerry has worked with the Colne Valley Regional Park and local authorities on mitigation for the HS2 project and mitigation for the Heathrow's 3rd runway proposal.

In the late 1990s he was Wycombe District Council's planning witness at a multi-site (5) Public Inquiry into Motorway Service Area proposals along the M40.

Jane Griffin MRTPI

Jane is a planner with 40 years' experience at national, regional and local level.

She previously worked on infrastructure projects for both South Bucks and Chiltern District Councils and prior to that at the regional level.

For the last 4 years she has been a Director of and advisor to the Colne Valley Regional Park.

MSA Application - PL/20/4332/OA

Strategic Sites Committee

**Impacts on the Green Belt and the Colne Valley Regional
Park – a more strategic approach**

Jerry Unsworth MRTPI and Jane Griffin MRTPI

September 2023



The CVRP



CVRP established 1965 – area within Bucks by far the largest part

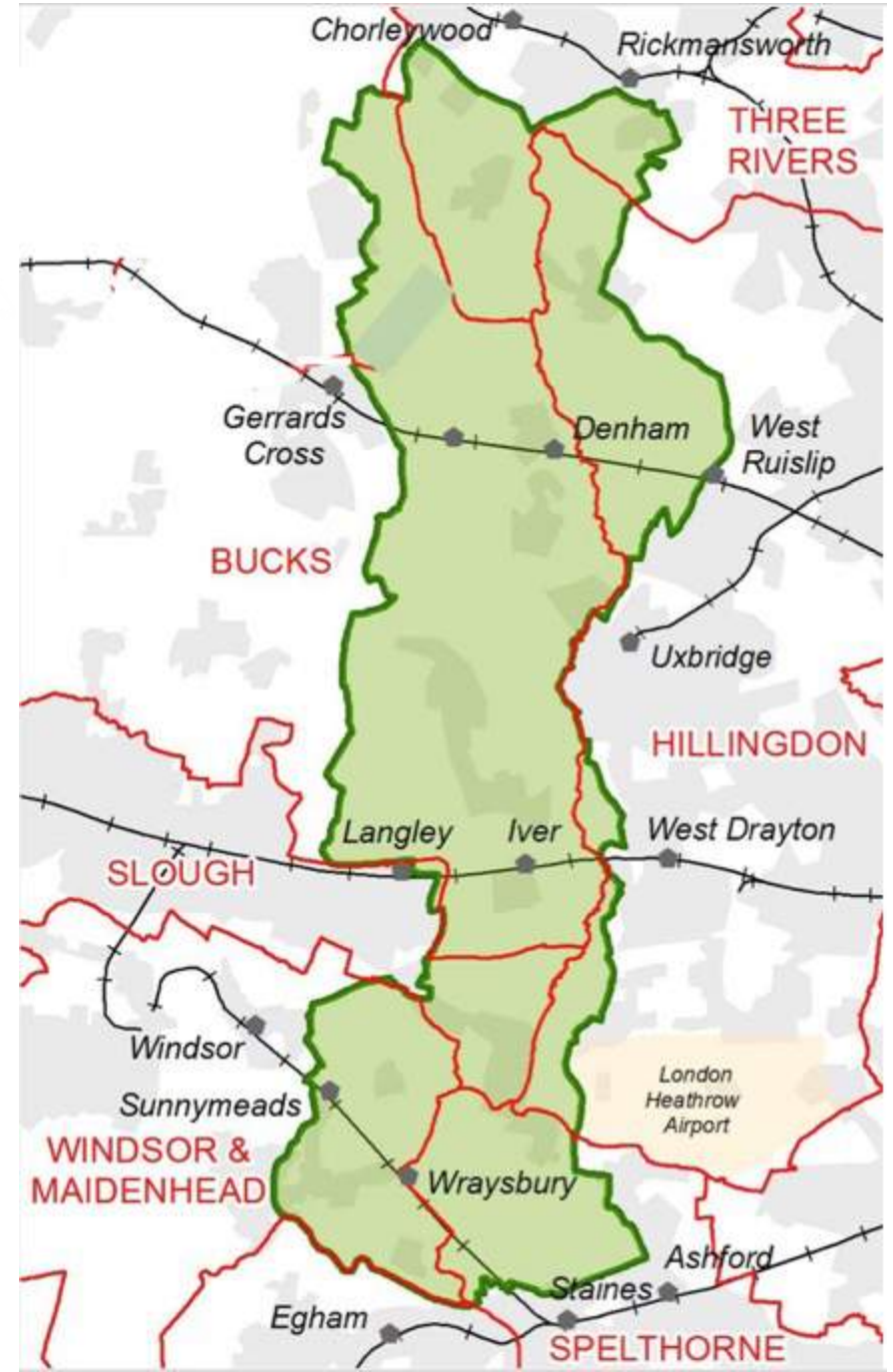
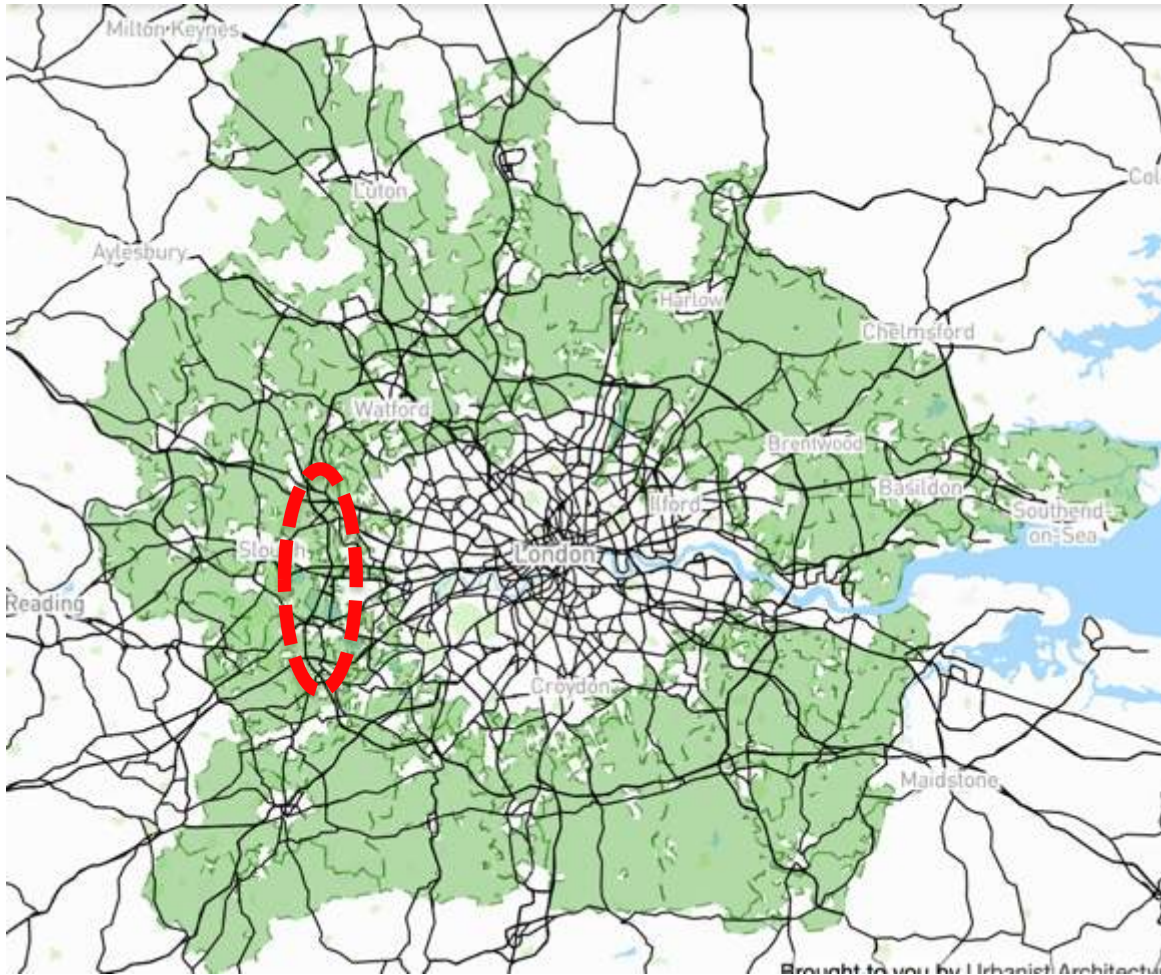
100's of green spaces, 5 country parks, 20 Nature Reserves, 13 SSSI's

>3M people within 10 miles

A strategically important natural environment resource

Sector from Uxbridge to Black/Langley Park critically important

Key to physical and mental health, biodiversity & local food production



A key inner part of London's Green Belt
First real taste of countryside to the west of London
Strategic potential with many improvement
opportunities - if planning sees and seizes them

Positive Planning - this is why the Colne Valley RP was established

- to improve the quality of the green and blue environment as a resource for the community

Colne Valley: A Landscape on the Edge
the Landscape Partnership in numbers

- 245 volunteers contributing 1050 hours to conserve and improve the Colne Valley
- 3 herds of conservation cattle helping to bring nature back to special places
- 10 hand-carved signs created with the help of a community shed project
- 17 people trained to check for signs of water voles and monitor for mink and 34km of rivers surveyed
- 70 local people volunteering at River Safeguards
- 2 weirs adapted to help fish and wild birds move freely along the rivers
- Colne Valley Park covers 40 square miles
- Over 70 lakes
- 20% of river and canal
- 8 angling clubs trained in nature conservation
- 10km of river checked for increasing aquatic species
- 3000 people enjoyed the Colne Valley Festival
- 46 training and expert sessions
- 1 knowledge exchange to help local conservation swap ideas
- 1 strategy to help put green and blue spaces centre stage in future plans and decision making for the Colne Valley
- 78 events to bring people closer to nature in their area

Explore the Colne Valley Trail

Floating Pennywort Removal at Uxbridge Moor
We need your help to remove Floating Pennywort which is suffocating the River Colne in Uxbridge.

Friday 11th October (10.30-15.30)
Everyone welcome. No experience needed.

Meeting Point: 11 Ainslie Rd, Uxbridge, UB8 3AP
Confirm your place with Claire at claire@colnevalleylandscapepartnership.org.uk 07796 13052

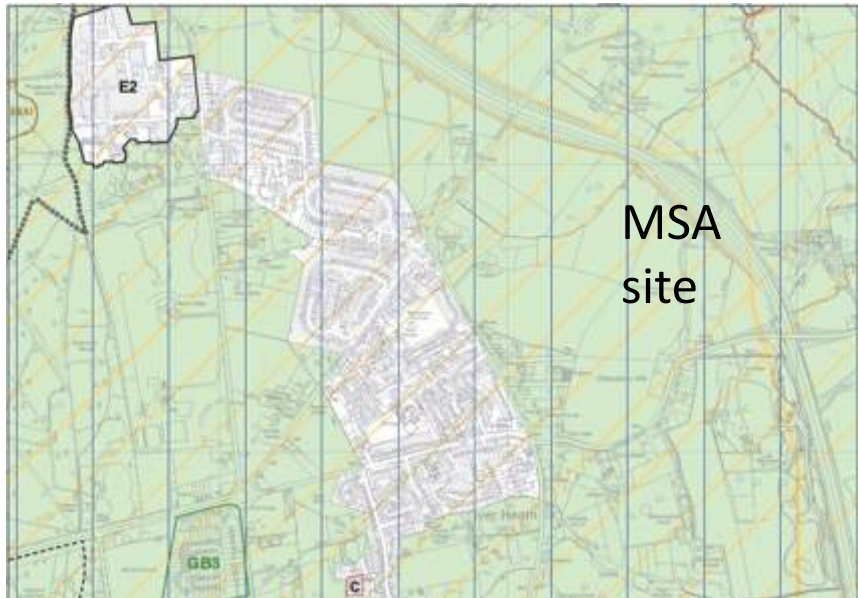
All you need: outdoor clothes and boots (essential!) We will provide: refreshments and bin bags

07796 13052 | claire@colnevalleylandscapepartnership.org.uk | www.colnevalleylandscapepartnership.org.uk

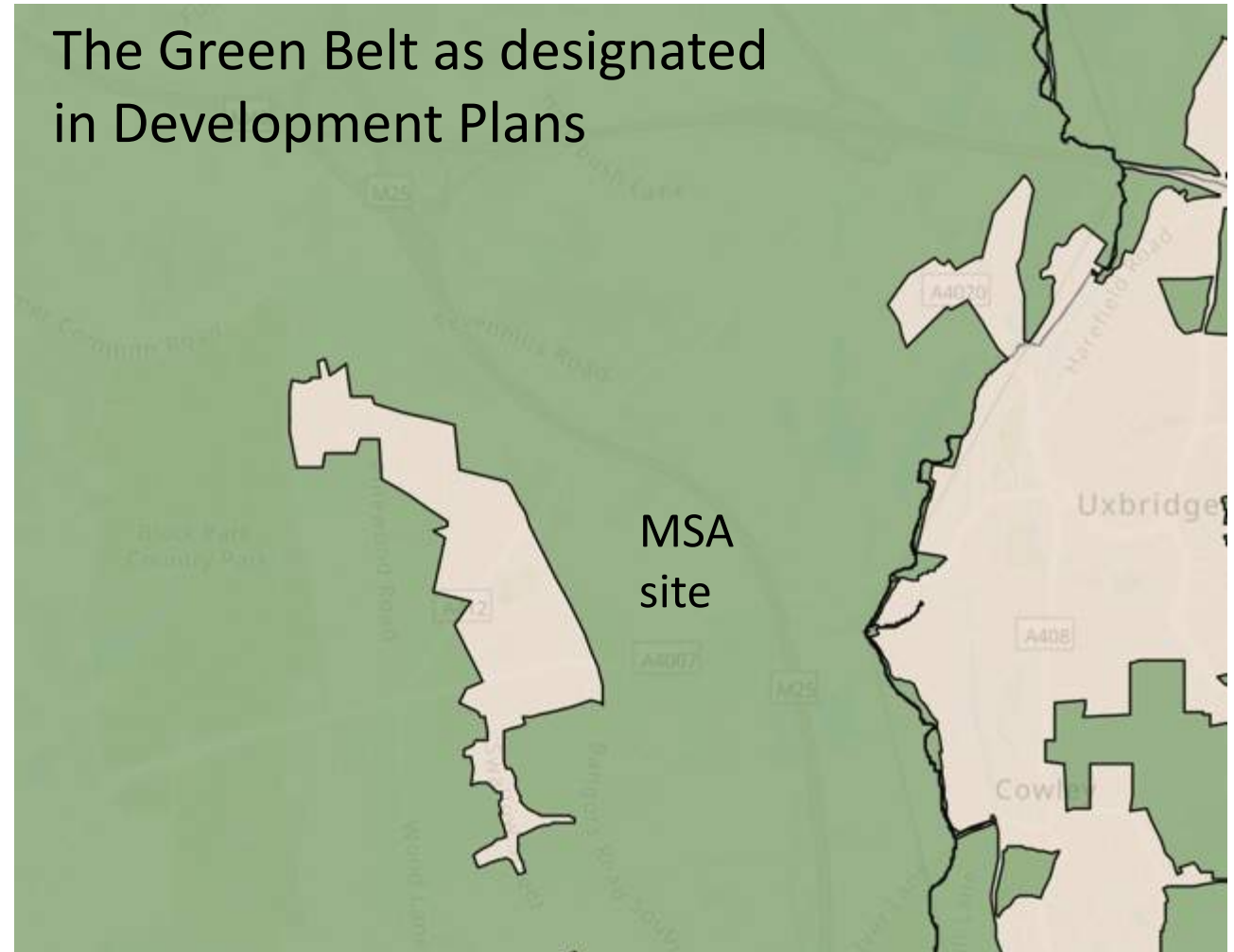
But the CVRP has to cope with urban fringe abuse and creeping development without accompanying wider improvements



The Starting Point – the Green Belt in the Development Plan



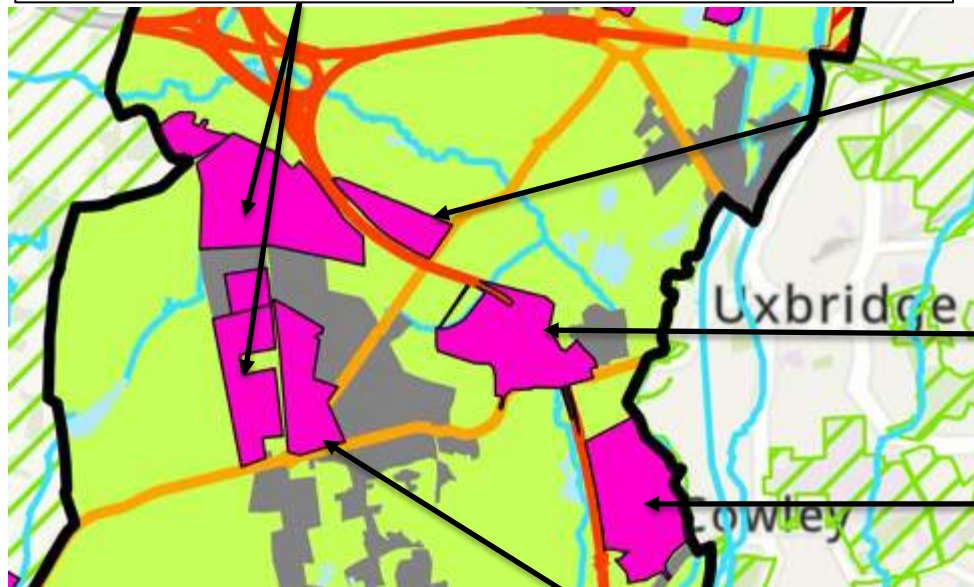
Extract from the adopted South Bucks Development Plan



The scale of of this MSA development and its strategic location in the countryside between Uxbridge and Black Park/ Langley Park/ Iver increase the weight that should be given to Green Belt harm in the balancing exercise

Added to this an overview is needed on what is incrementally happening to our Green Belt and CVRP

Pinewood Studios – huge growth agreed via a series of separate applications



Data Centre – live application

The MSA site

Data Centre – appeal decision awaited

Housing site in withdrawn Local Plan



The Colne Valley Regional Park works to improve access from urban areas to the countryside. The Local Planning Authority must play their part and, if it considers very special circumstances exist (in this case the need for a MSA) for large scale development in the GB

National Policy calls for positive planning

consideration needed with weight given

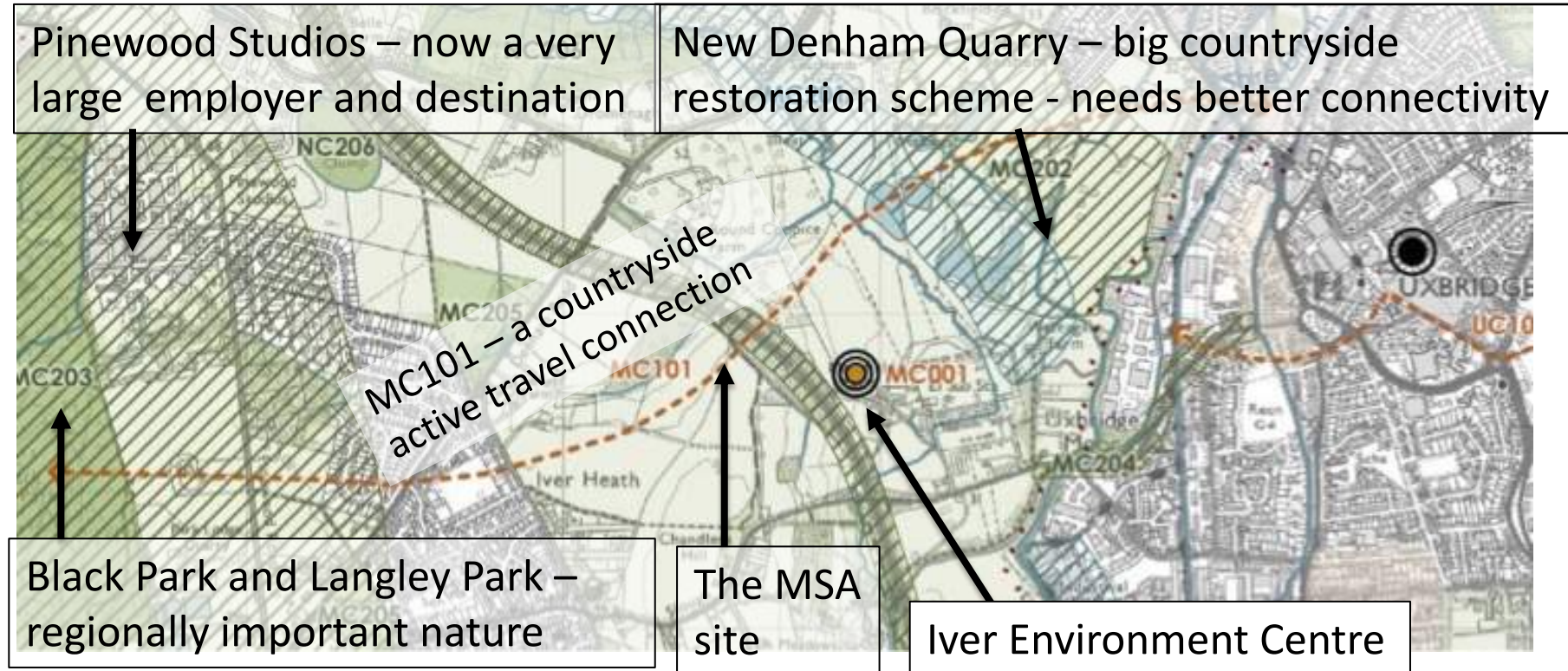
NPPF Para 140 states that “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”

The absence of an up-to-date Local Plan does not mean that Green Belt boundaries should effectively be altered via a series of large individual planning applications, all claiming very special circumstances, without a strategic view being taken of how the area of Green Belt should be positively planned to realise its potential.

NPPF Para 145 (quoted here) flags your positive planning role. Planning positively is an aspect of handling large planning applications, not just in policy planning. This has not been addressed in the report, in favour of a narrow assessment.

145. 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.

2019 Colne & Crane Valleys Green Infrastructure Strategy extract



This 2019 GI Strategy provides a vision for landscape enhancement, including off-road active travel. The MSA site occupies a pivotal location. Not only is an off-road active travel route key to opening up the GB for recreation, the major growth at Pinewood will also benefit. Workers/ visitors from the Uxbridge area should have a good off-road active travel option - the on-road provision will never be a relaxing experience. Bucks Council need to play their part.

Iver Neighbourhood Plan (INP) is part of the Development Plan and its policies need to be given weight, incl. the 2019 Green Infrastructure Strategy

- More weight should be given to the policy provisions in the INP – especially with regard to the positive enhancements and mitigation that should be planned for if development is to be accepted.
- Policies and related text that can and should be given more weight include:
 - Policy IV1 (gaps & corridors of significance), IV7 (Air Quality), IV8 (managing traffic), IV9 (HGVs) & IV13 (Colne Valley RP)
- IV13 states that “Development proposals should make a positive contribution towards improvement of the Colne Valley Regional Park in line with its objectives and the Colne & Crane Valleys Green Infrastructure Strategy ...” This, on its own, warrants a far more positive approach to ‘countryside’ planning and mitigation than we see.
- In that context the harm identified to the Green Belt should be much higher - which affects the balancing exercise.



THE IVERS
PARISH COUNCIL

THE IVERS
NEIGHBOURHOOD PLAN
2021 – 2040

FINAL PLAN

Published by The Ivers Parish Council for the
Neighbourhood Planning (General) Regulations 2012 (as
amended)

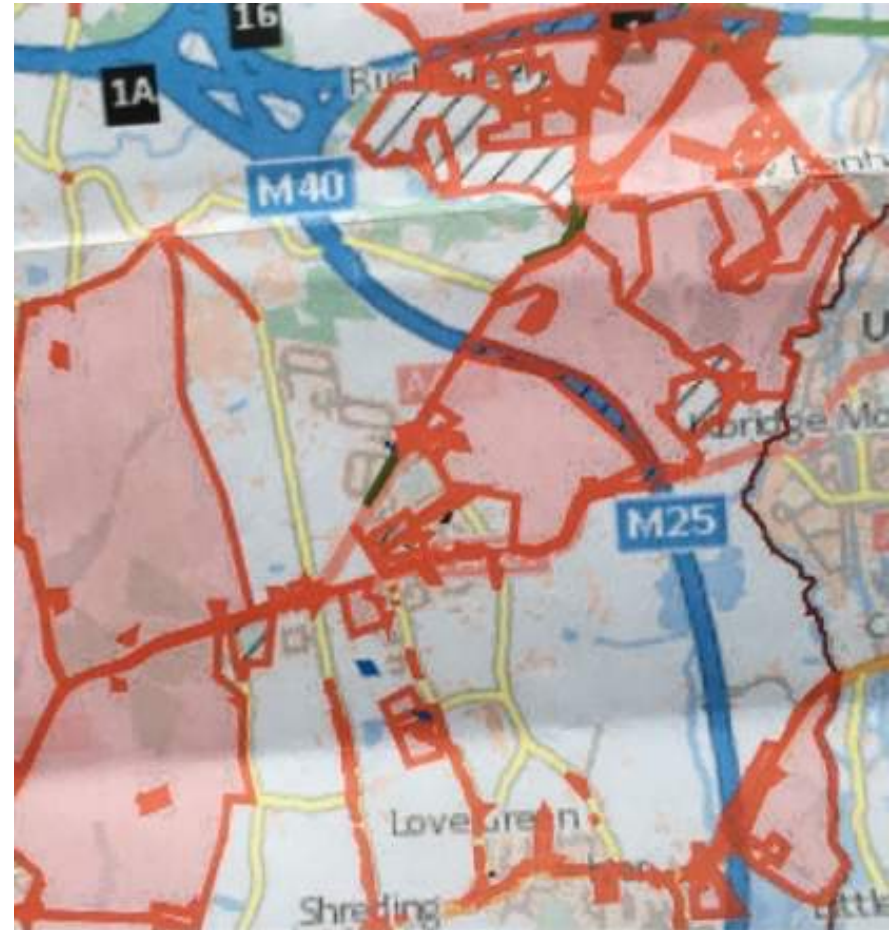
October 2022

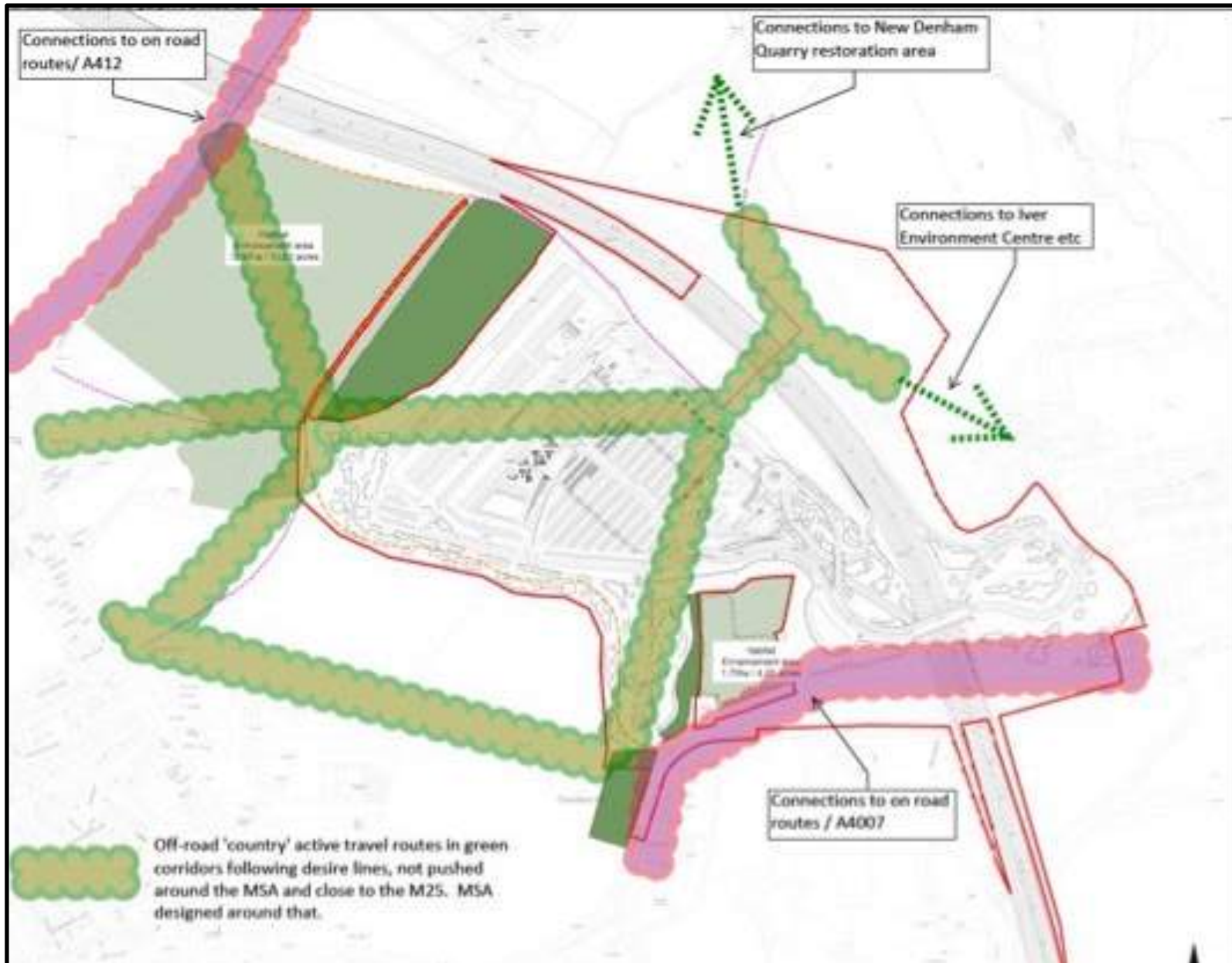
Does the 2021 Chalfont MSA decision constrain?

- The site under detailed scrutiny was the Chalfont one, not the Iver one
- The promoters of the Iver site presented arguments in favour of their site
- It was not a multi-site Inquiry, with all considerations examined and a full balancing exercise undertaken, with the conclusion a choice between sites
- It was just a decision on the Chalfont site
- Whilst the Inspector, based on information available, preferred the Iver site, he was not charged with considering its design and mitigation
- The 2022 Iver Neighbourhood Plan was not and could not be considered
- Even if the Council decide that an MSA in this broad location is strategically justified, this does not mean that the design and package proposed should be accepted
- With other relevant considerations a fresh assessment & balancing exercise is needed

Council Land Ownership and Responsibility

- As the map shows Council land ownership is extensive in this area and is a legacy of land acquisition in the 1930s when it came to the LA as along term landscape resource for the capital
- Landscape decline has got significantly worse over the last 10 years.
- This is bad enough coming from developers (who are responsible to shareholders), but we expect better from our Buckinghamshire Council, as guardians of our environment and answerable to its residents





Brainstormed ideas for a Green Infrastructure (GI) led scheme rather than one where mitigation is retrofitted.

As well as mitigation through layout and design a much better off-site mitigation package is needed

Conclusion - what next?



1. **Time out** – this huge incursion into the Green Belt, needs a fresh vision
2. **A turning point** for the Green Belt and CVRP
3. **Opportunities must be seized now** - to link up and improve the functioning of the countryside
4. **Strategic Thinking** needed or opportunities will be lost forever
5. **Committee to send the developers back to the drawing board** – for a GI-led scheme with strategic mitigation

The Council has the ability and power to create a better future. If you want to. The CVRP, as an organisation is a resource to collaborate with.

Thank You for your consideration

“If we are unwilling to embrace these challenges and fundamentally change our approach, then perhaps we should leave the Green Belt intact for future and hopefully more responsible generations.”

(a quote from the concluding chapter in this 2021 book)

THE GREEN BELT IN THE 21ST CENTURY

*Peter Bishop, Alona Martinez Perez,
Rob Roggema and Lesley Williams*



UCLPRESS



Slides prepared by Jerry Unsworth MRTPI and Jane Griffin MRTPI