

Buckinghamshire Council
Planning Service
King George V House
King George V Road
Amersham
HP6 5AW



March 2024

Dear Sir/Madam

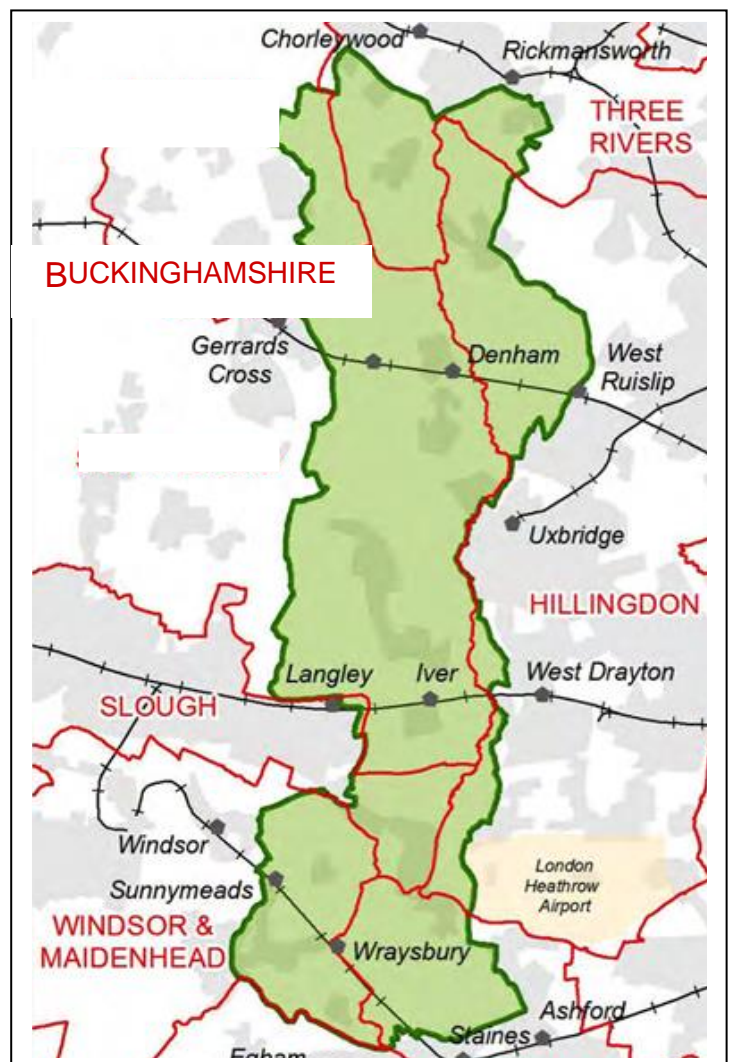
PL/24/0449/FA

Iver substation (Uxbridge Moor) Slough Road Iver Heath SLO OED.

This response is from and on 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 nearly 100 member organisations including local authorities, businesses, residents' associations, environmental charities and user groups. Groundwork South acts as the Park's managing agent.



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 parochial 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.

The Colne Valley Regional Park is a Community Trust funded by local authorities and donations from corporate sponsors and members of the public. To mitigate the development if approved, we would wish to be involved in any S106 agreement in order that benefits accrue to the CVRP consistent with national planning policy.

This application to provide additional substations on this large area of land currently within public ownership, is stated to cater for a commitment made to provide electricity to proposed data centres. The Iver area has been the location for at least five data centre proposals fully or partially on the Green Belt. So far, three have been refused on Green Belt grounds, of which two have gone to appeal and had their applications dismissed. It is not considered that there are very special circumstances for data centres to override GB policies.

We are concerned about a number of issues that we do not believe have been adequately addressed by this application.

- The impact on the operation of Iver Environment Centre, including access and the impact on children's health from electro-magnetic fields. This facility provides a much in demand outlet for school children to experience the countryside and learn about growing food and the joy of outdoor activity. It should be protected from this development by continued assured funding and the provision of a buffer of land known as the triangle.
- The threat to the riparian environment and biodiversity of the Alderbourne, a crucially important and highly-valued chalk stream, in terms of pollution and bank damage
- The lack of mitigation for the local community on what is currently land in the public domain.
- The failure of this development to connect up potential green travel routes for the benefit of residents in Iver Heath, New Denham and Uxbridge as detailed in the Green Infrastructure strategy detailed above and the Neighbourhood Plans by using this land and the surrounding publicly owned land.
- The impact of light pollution on biodiversity
- The impact on the Colne Valley Regional Park has been classified as minor and not significant despite the application involving loss of category 3A BMV agricultural land and building on

permanent land within the Regional Park which is already severely affected by other infrastructure projects.

- Potential for combined negative impact from two major infrastructure projects (the MSA on the western side of the M25) being carried out at the same time without adequate mitigation for IEC and the local community.

The application ignores the significant and direct implications the development will have on the Colne Valley Regional Park (CVRP) and its six objectives, even though it is a local and neighbourhood plan consideration.

The CVRP is a designation defined within the South Bucks Proposals Map and given protection within CP9 of the Core Strategy. We are therefore calling for mitigation for the Regional Park within this policy context.

Para 3.3.19 of CP9 clearly states that the CVRP presents many opportunities for improvement in line with the five aims of the CVRP (now six objectives). Building within the CVRP harms the features outlined in 3.3.14 such as woodlands, grasslands, fields, crops and open spaces – all covered by our six objectives.

Therefore mitigation, as requested, to compensate for the harm is clearly within the remit of this policy, which in bullet point 5 seeks improvement by supporting and implementing initiatives in the CVRP Action Plan now superseded by the Colne and Crane GI strategy, also relevant to bullet point 4 of the Policy. The site is also within a Biodiversity Opportunity Area as designated on the Proposals Map.

The Biodiversity Action Plan, BAP 2030 states on p8, para 16: *"This BAP will serve as the interim biodiversity strategy for nature's recovery until such time as finalised LNRs are in place across Buckinghamshire and Milton Keynes."*

The application includes land largely restored for agriculture. Agriculture is, therefore, an appropriate and vital use of the Green Belt and the Colne Valley Regional Park.

The NPPF paragraphs – para 145 on the need for green infrastructure and biodiversity improvements; para 154 on climate change in vulnerable areas where risks should be managed through suitable adaptation measures, including through the planning of green infrastructure are applicable. Also of importance is the new guidance on Local Nature Recovery Strategies published in March 2023 para 82 (regarding nature recovery and public access to nature.) These national policies do not appear to have been sufficiently considered in this application, but these measures are consistent with the aims and objectives of the CVRP which will be materially harmed by this application.

Should permission be granted, we would like to see progress made – at the very minimum – in providing for a new public right of way connecting the proposed right of way across the farm crossing of the M25, with the community at New Denham.

In terms of mitigation for the loss of land within the CVRP, we would like compensation of £20,000 a year to spend on habitat and biodiversity projects, in line with compensation agreed on other new infrastructure projects within the Regional Park.

Yours sincerely
Stewart Pomeroy
Managing Agent