

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

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



April 2024

Dear Sir/Madam

PL/24/0754/OA – Woodlands Park Landfill Site Land South Of Slough Road Iver  
Buckinghamshire

**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 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/>



**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](http://www.colnevalleypark.org.uk)

## **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**

This application, for two buildings totalling 72,000 sq meters in the Green Belt, follows the Secretary of State's recent refusal on appeal on the basis that buildings on this site are harmful to the purposes of the Green Belt. The data centre does not meet the Very Special Circumstances test as there are alternative non-Green Belt sites available in either the Slough or the Docklands Availability Zone, or in any of the home counties specified in the DoT letter. That is still the position and it applies equally to this latest application.

In addition, the data centres are dependent on the expansion of Iver substation. This current application has not yet been determined. If approved, construction work will take some years before it becomes operational. This application is therefore premature.

We are also hugely concerned about the cumulative impact – not mentioned by the applicant – of the possibility of both of these developments being built at the same time as the motorway service area works on the site to the north of Slough Road. The significant amount of construction traffic will severely and negatively affect air quality for the local community and more widely on those using the Colne Valley Regional Park.

We note that the development footprint is now substantially smaller than the previous application, and lower in height. However, 14m-high buildings will still dominate their surroundings, be visible and harmful to the openness of the Green Belt and give the impression of encroachment into the Green Belt from the current clear boundary of the West London Industrial Park and the River Colne. This is contrary to national Green Belt Policy.

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The Green Belt in this location existed since the early 1950s – after 70 years, it has achieved permanence and should remain undeveloped in perpetuity to meet government GB policy.

The applicant refers to para 150 of the NPPF, stating that this ‘damaged land ‘should carry significant weight. In fact, this is restored agricultural land and achieves the definition of undeveloped Green Belt which contributes to the function of GB and the openness characteristic of the Colne Valley floor. It does not justify development. The applicant should take more account of the requirement to enhance landscapes, visual amenity and biodiversity, as well as increasing opportunities for outdoor sport and recreation.

Para 150 of the NPPF states:

*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.*

This paragraph is entirely consistent with the objectives of the CVRP and it looks to Buckinghamshire to help achieve this by not approving developments within the Park.

Data centres by their very nature consume large amounts of electricity and produce substantial amounts of heat requiring artificial cooling; they contribute to a localised heat island effect.

The addition of green walls and brown roofs is proposed. Green walls, however, must be water-efficient: e.g rainwater should be collected on site to provide irrigation where necessary. The applicant aims to only use green electricity from the National Grid; however, it does not appear to consider generating its own electricity or using the waste heat for other purposes, such as agriculture or recreation. Mention is made of a possible link to a district heat network, but there are no details as to who this would serve and how.

Built development is only on part of this large site. There are countless recreation opportunities including rights of way that could benefit the local community which this application does not.

Of the greatest concern to us is that if approved, this application would set a fundamental precedent for further development, particularly from data centres, in this part of the Green Belt to the detriment of the CVRP and the local community.

In terms of mitigation for the harm this development will cause to the Regional Park and the Green Belt, and to reflect the requirements of CP 9 of the South Bucks Local Plan, we would like to see:

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- Contribution to a Countryside Management Service project in the Colne Valley Regional Park in proximity (approx. 3km) to the site to result in improvement and maintenance of the landscape, biodiversity, access, signage, and river habitat. This can contribute to the delivery of the Colne & Crane GI strategy projects: 'Whole Area': Project X. 'North Colne' and 'Mid Colne': Projects NC206, MC101 (proposed paths could form part of this link. Planning gain to contribute to feasibility/options appraisal for Uxbridge to Iver Heath green route), MC201 and MC205.

Buckinghamshire Council should therefore support the CVRP in delivering its six objectives by refusing this application.

Yours  
Jane Griffin  
Trustee

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