

## Colne Valley Regional Park response to Buckinghamshire sites consultation

This response is submitted by Rosie Brake MRTPI of Making Places Together on behalf of the Colne Valley Regional Park Trust. Making Places Together acts as consultant planners to the Trust.

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Our response is in three parts:

- Feedback on the HELAA sites
- Commentary on the expansion of Chalfont St Peter set out in the New and Expanded Settlements Study
- Observations on the Green Belt Study and its methodology

### HELAA sites

Thank you for the opportunity to provide further information on the HELAA sites for Buckinghamshire. There are more than 60 sites relevant to the Park identified as not unsuitable. Therefore, we are combining our response into one document rather than submitting a form for each site.

The short consultation period has prevented us from making more detailed comment, but we hope the following is helpful. There are some sites where we haven't been able to comment due to lack of information, but we might consider it appropriate at a later stage when we have more detail. The absence of comment should not be taken as the CVRP either supporting or rejecting these sites.

We have discovered a few anomalies between the HELAA spreadsheet and the interactive map. The following OPUS site numbers are shown as 'unsuitable' on the map but appear in the 'suitable' or 'suitability to be confirmed' tabs of the spreadsheet:

1286, 1307, 4284

Similarly, the following site numbers are shown as 'Further assessment required' on the map but appear in the 'suitable' tab of the spreadsheet:

3508, 3509, 3517

We nevertheless provide commentary on these sites.

Suitable sites

| OPUS Reference   | Site Name/Location  | Post Code | Parish             | Type       | Use     |
|--|---|-----------|--------------------|------------|---------|
| 144  | Land adjoining Winkers Farm, Denham Lane, Chalfont St Peter, Gerrards Cross | SL9 0QH   | Chalfont St Peter  | Greenfield | Housing |
| The development of sites 144, 272 and 586 together would amount to a further extension of Chalfont St Peter village, and would suffer from poor transport connections - the same points as with the proposed expansion area would apply regarding walking and cycling, and Denham Lane was not built to carry a large volume of traffic.   |   |           |                    |            |         |
| 213  | Love Green Farm   | SL0 9RA   | Iver               | Greenfield | Housing |
| Grey belt designation should be reassessed as part of the separation between Iver and Iver Heath both of which should be considered as towns.  |   |           |                    |            |         |
| 272  | Winkers Farm Nightclub, Denham Lane, Chalfont St Peter                      | SL9 0QJ   | Chalfont St Peter  | Mixed      | Housing |
| This site is already developed and is referred to as not being within the Green Belt. The development of sites 144, 272 and 586 together would amount to a further extension of Chalfont St Peter village, and would suffer from poor transport connections - the same points as with the proposed expansion area would apply regarding walking and cycling, and Denham Lane was not built to carry a large volume of traffic. |   |           |                    |            |         |
| 405  | Land west of Richings Park (west of Syke Cluan and north of North Park)     | SL0 9EW   | Iver               | Greenfield | Housing |
| It is questionable whether this site is deliverable as it has been subdivided into many small plots each of which has been sold off separately so there is no one owner. The Council will need to provide evidence that all landowners are willing to cooperate on development here.<br>The status of any Article 4 direction should be checked and acknowledged.  |   |           |                    |            |         |
| 568  | Land to south of Winkers Farm, Denham Lane, Chalfont St Peter               | SL9 0QH   | Chalfont St. Peter | Greenfield | Housing |
| The development of sites 144, 272 and 586 together would amount to a further extension of Chalfont St Peter village, and would suffer from poor transport connections - the same points as with the proposed expansion area would apply regarding walking and cycling, and Denham Lane was not built to carry a large volume of traffic.   |   |           |                    |            |         |
| 578  | Land to the NW of Mansion Lane. Iver, South Bucks                           | SL0 0JG   | Iver               | Greenfield | Housing |
| This area consists of 3 plots each owned by different people, so the Council will need to evidence deliverability here. The northern field has been divided into small plots many of which have been sold off to individual owners, so again deliverability is questionable.   |   |           |                    |            |         |

| OPUS Reference  | Site Name/Location  | Post Code | Parish               | Type       | Use        |
|---|---|-----------|----------------------|------------|------------|
| <p>There is a fuel pipeline serving Heathrow running through it which requires a 6-metre exclusion zone. This restricts the developable area and limits good place-making options.</p> <p>The status of any Article 4 direction should be checked and acknowledged.</p>   |   |           |                      |            |            |
| 707   | Pinewood Studios,<br>Pinewood Road, Iver Heath                                | SL0 0NH   | Iver,<br>Wexham      | Greenfield | Employment |
| <p>This site already has planning permission for a data centre. Typically, this use provides low job density which may not even be local to the area (remote working).</p>  |   |           |                      |            |            |
| 758   | Land to the north of West<br>Hyde Lane, Chalfont St<br>Peter, Buckinghamshire | SL9 0QP   | Chalfont St<br>Peter | Greenfield | G&T        |
| <p>Development of this site would close some of the current gap between Chalfont St Peter and Harefield/Denham. It is within assessment area CPGC005, which is evaluated as Provisional Grey Belt. It should therefore be rated as requiring further assessment in respect of the adjoining Ancient Woodland.</p> |   |           |                      |            |            |
| 1141  | Former Tilehouse Day<br>Centre, Knightingale Way                              | UB9 5JJ   | Denham               | Brownfield | Housing    |
| 1208  | Land off St Mary's Road,<br>Denham Green                                      | UB9 5JU   | Denham               | Brownfield | Housing    |
| 1220  | New Denham shops.<br>corner of Newtown Rd and<br>Oxford Road                  | UB9 4DN   | Denham               | Brownfield | Housing    |
| 1222  | New Denham Esso,<br>Commercial area, 8 Oxford<br>Road                         | UB9 4DN   | Denham               | Brownfield | Housing    |
| 3148  | St James' Farm, Iver  | SL0 0AX   | Iver                 | Greenfield | Housing    |
| <p>Grey belt designation should be reassessed as part of the separation between Iver and Iver Heath both of which should be considered as towns</p>   |   |           |                      |            |            |
| 3167  | Land west of Swallow<br>Street, Iver Heath                                    | SL0 0ES   | Iver                 | Mixed      | Housing    |
| <p>This site consists of 2 green fields – it is not mixed. It already has planning permission for 43 dwellings on the northern area.</p>  |   |           |                      |            |            |
| 3283  | Fourells Paddock  | SL0 9DE   | Iver                 | Brownfield | Housing    |
| <p>Currently a stables in the northern area with grazing at the rear. Already has planning permission for 30 dwellings.</p>   |   |           |                      |            |            |
| 3418  | Land to the South of the<br>High Street, Iver, Bucks                          | SL0 9ND   | Iver                 | Brownfield | Mixed Use  |

| OPUS Reference  | Site Name/Location  | Post Code | Parish | Type       | Use        |
|---|---|-----------|--------|------------|------------|
| This is supported as a much-needed regeneration of the High street.   |   |           |        |            |            |
| 3428  | Land lying to the east of Sutton Lane, Langley, Slough and Land adjoining Orchard House, Sutton Lane, Langley, Slough | SL3 8AR   | Iver   | Brownfield | Housing    |
| This is not brownfield. It was a greenfield site but was utilised as unlawful airport parking which was the subject of enforcement action. The hard standing etc left should be removed to return it to greenfield.   |   |           |        |            |            |
| 3508  | SummerLeaze post quarry land (denham estate plan)   | UB9-4HE   | Denham | Mixed      | Employment |
| This site would be much more appropriately used for the relocation of Hillingdon Outdoor Activity Centre (HOAC), which was displaced by HS2. The current option for relocation at Broadwater Lake would damage the SSSI there. The Trust recognises that this would require cooperation between the two relevant authorities (Buckinghamshire and LB Hillingdon). It is a large tract of land that if developed will substantially diminish the gap between West London and Gerrards Cross. |   |           |        |            |            |
| 3509  | land south of Tendercare (denham estate plan)   | UB9 4HL   | Denham | Greenfield | Employment |
| This land is currently actively farmed. Farming is a key concern for the CVRP as it is fundamental to maintaining the unique rural patchwork across the Park.<br><br>It is a large tract of land that if developed will substantially diminish the gap between West London and Gerrards Cross.  |   |           |        |            |            |
| 3517  | Summerleaze new expansion area N (denham estate plan)   | UB9 4HB   | Denham | Greenfield | Employment |
| Taken in isolation this piece of land is not adjacent to an existing settlement and so would not be a sustainable location. It would further erode the openness between Uxbridge and Gerrards Cross.<br><br>Taken in association with 3508 to the south, it becomes a large tract of land that would substantially diminish the gap between those towns.  |   |           |        |            |            |
| 3539  | Trenches Lane   | SL3 6BZ   | Wexham | Greenfield | Employment |
| 4284  | Land south of Iver  | SL0 9JQ   | Iver   | Greenfield | Employment |
| There is no independent vehicular access to this site other than via the adjacent site for which a planning application for a data centre had been submitted. It seems likely, therefore, that this site is being put forward as another data centre site. These uses provide low job density, and many posts will not be filled locally but through remote working. This site is shown as 'unsuitable' on the interactive map.   |   |           |        |            |            |
| 6550  | Mansion Lane Iver   | SL0 9RW   | Iver   | Greenfield | G&T        |

| <b>OPUS Reference</b>  | <b>Site Name/Location</b>  | <b>Post Code</b> | <b>Parish</b>     | <b>Type</b> | <b>Use</b> |
|--|--|------------------|-------------------|-------------|------------|
| There are many existing traveller pitches in Iver, many of which are not being used as this but are used to house homeless people from Slough. This needs to be sorted out before any more are created. There are enough existing pitches in Iver to satisfy the local demand. Adding more pitches could exacerbate the existing interfamily issues. |  |                  |                   |             |            |
| 6563   | Broadwater Park Denham (ELR Site 96)                                   | UB9 5HR          | Denham            | Brownfield  | Employment |
| 6575   | Land within the Epilepsy Society site, North East of Chalfont St Peter | SL9 0RJ          | Chalfont St Peter | Greenfield  | Housing    |
| Currently the subject of an active planning appeal.  |  |                  |                   |             |            |

### Part suitable sites

| <b>OPUS Reference</b>   | <b>Site Name/Location</b>        | <b>Post Code</b> | <b>Parish</b> | <b>Type</b> | <b>Use</b> |
|---|----------------------------------|------------------|---------------|-------------|------------|
| 10  | Wood Lane Farm                   | SL0 0LD          | Iver          | Greenfield  | Housing    |
| Grey belt designation should be reassessed as part of the separation between Iver and Iver Heath both of which should be considered as towns  |                                  |                  |               |             |            |
| 3512  | Evreham Adult Learning Centre    | SL0 0HS          | Iver          | Mixed       | Housing    |
| This is the existing adult education centre and youth centre and the outdoor sports pitch. It is totally unacceptable to replace it with housing. It is listed in the Ivers Neighbourhood Plan as a community facility. Any allocation here would need to demonstrate compliance with NPPF paragraphs <b>98 (c)</b> (guard against the unnecessary loss of valued facilities and services) and <b>104</b> (building on open space). It would also need to comply with Sport England policy for the redevelopment of outdoor facilities. |                                  |                  |               |             |            |
| 6571  | Land North of Iver Station, Iver | SL0 9HF          | Iver          | Brownfield  | Mixed use  |
| There are 2 sets of planning applications for data centres on this site already which does not accord with the Ivers Neighbourhood Plan. This should be respected.  |                                  |                  |               |             |            |

### Suitability to be confirmed sites

| <b>OPUS Reference</b>  | <b>Site Name/Location</b>              | <b>Post Code</b> | <b>Parish</b> | <b>Type</b> |
|--|--|------------------|---------------|-------------|
| 14   | Calves Lane Farm, Bellswood Lane, Iver | SL0 0LU          | Iver          | Brownfield  |
| Grey belt designation should be reassessed as part of the separation between Iver and Slough both of which are considered as towns, and in the wider context of protecting the Green Belt around London. |  |                  |               |             |

| <u>OPUS Reference</u>  | <u>Site Name/Location</u>   | <u>Post Code</u> | <u>Parish</u> | <u>Type</u> |
|--|---|------------------|---------------|-------------|
| 169  | Land East of Thorney Lane South, Richings Park  | SLO 9AS          | Iver          | Greenfield  |
| There is already planning permission for a car park on the northern part of this site and the southern area is a scheduled ancient monument so the opportunity for development is limited.   |   |                  |               |             |
| 240  | Land at Thaxted, Hollybush Lane, Iver   | SLO OJU          | Iver          | Greenfield  |
|  |   |                  |               |             |
| 242  | Land east of Oxford Road, Denham  | UB9 4DW          | Denham        | Greenfield  |
| <ul style="list-style-type: none"> <li>We disagree with the Provisional Grey Belt assessment here. There is a strong perception of open space for London residents as the Colne Valley opens out in front of you when travelling from east to west on the A40 (and vice-versa = large taste of open space before you enter London). Surely this is exactly the type of area that Green Belt policy was designed to protect when originally established – this is about as far away from a ‘disused car park or abandoned petrol station’ as you can get. Surely no reasonable member of the public would say that this area meets the ‘high-level’ stated intentions for grey belt.</li> <li>The eastern part of the site is in a flood zone, which limits the developable area.</li> <li>Residential development here would be severely affected by noise from the motorway junction and the surrounding busy roads of the A40 and A4020.</li> <li>Furthermore, it is adjacent to the River Colne and needs to be retained undeveloped to support the ecology of the river as part of the essential role of green infrastructure that the Park provides.</li> </ul> |   |                  |               |             |
| 247  | Land at 74 Oxford Road  | UB9 4DN          | Denham        | Brownfield  |
| This site is already substantially developed. No objection to its removal from the green belt and redevelopment.   |   |                  |               |             |
| 305  | Chalfont House, Oxford Road, Denham, Buckinghamshire  | UB9 4DX          | Denham        | Brownfield  |
| Already substantially developed. No objection to removal from green belt or redevelopment.   |   |                  |               |             |
| 307  | Land adjacent to the M25 junctions 15 – 16, immediately north of A4007 Slough Road, near Iver Heath | SLO 0EA          | Iver          | Greenfield  |
| <ul style="list-style-type: none"> <li>This land is currently actively farmed. Farming is a key concern for the CVRP as it is fundamental to maintaining the unique rural patchwork across the Park.</li> <li>The area to east of M25 in the Alderbourne valley regularly floods several times every year, being in flood zones 2/3. This limits the developable area to the part of the site to the west of the M25.</li> <li>This western portion slopes down to the motorway so there is little opportunity for effective noise mitigation.</li> <li>Development on this slope will be highly visible up and down the valley and detract from the rural nature of the Park.</li> <li>The site is isolated from other settlements so cannot be considered a sustainable location.</li> </ul>   |   |                  |               |             |

| <u>OPUS Reference</u>   | <u>Site Name/Location</u>                              | <u>Post Code</u> | <u>Parish</u> | <u>Type</u> |
|---|--|------------------|---------------|-------------|
| <ul style="list-style-type: none"> <li>The Grey Belt designation should be reassessed as it forms part of the separation between Iver Heath and Uxbridge both of which should be considered as towns, and in the wider context of protecting the Green Belt around London.</li> </ul>   |  |                  |               |             |
| 451   | The Paddock, Wood Lane, Iver Heath, Iver               | SLO 0LA          | Iver          | Brownfield  |
| <p>Grey belt designation should be reassessed as it forms part of the separation between Iver and Slough both of which are considered as towns, and in the wider context of protecting the Green Belt around London. The existing development on the site is unlawful and so it should not be considered as brownfield.</p>   |  |                  |               |             |
| 456   | Park Lodge Farm, Pinewood River, Iver, Buckinghamshire | SLO 0NE          | Iver          | Greenfield  |
|   |  |                  |               |             |
| 784   | Land to the east of Old Mill Lane, Denham              | UB9 5BW          | Denham        | Greenfield  |
| <p>We disagree with the Provisional Grey Belt assessment here. There is a strong perception of open space for London residents as the Colne Valley opens out when travelling from east to west on the A40 (and vice-versa = large taste of open space before you enter London). Surely this is exactly the type of area that Green Belt policy was designed to protect when originally established.</p>   |  |                  |               |             |
| 932   | Anamax Group, Oxford Road, Gerrards Cross              | SL9 7BB          | Denham        | Brownfield  |
| <p>Development of this land for housing must comply with the Golden Rules by contributing to adjacent Caps Wood</p>   |  |                  |               |             |
| 938   | Land at and to the rear of 85 Thorney Mill Road, Iver  | SLO 9AH          | Iver          | Brownfield  |
|   |  |                  |               |             |
| 944   | Union Point, Pinstone Way, Gerrards Cross              | SL9 7BJ          | Denham        | Brownfield  |
| <p>Development of this land for housing must comply with the Golden Rules by contributing to adjacent Caps Wood</p>   |  |                  |               |             |
| 1135  | Ugly Duckling/Toby Carvery, Oxford Road                | UB9 4LJ          | Denham        | Brownfield  |
| <p>Development of this land for housing must comply with the Golden Rules by contributing to adjacent Caps Wood</p>   |  |                  |               |             |
| 1145  | Telephone Exchange and Esso Garage, 21 Oxford Road     | UB9 4DG          | Denham        | Brownfield  |
| <p>Already substantially developed. No objection to redevelopment.</p>  |  |                  |               |             |
| 1147  | The Plough/The King Pub, Cheapside Lane                | UB9 5AB          | Denham        | Brownfield  |
| <p>Already within the urban area.</p>   |  |                  |               |             |
| 1221  | Highways England site, Denham roundabout               | UB9 4DW          | Denham        | Brownfield  |
| <p>This site is already substantially developed. However, any redevelopment needs to ensure a substantial greenery because here is a strong perception of open space for London residents as the Colne Valley opens out when travelling from east to west on the A40 (and vice-versa = large taste of open space before you enter London), and substantial tree planting on this site as part of a redevelopment will help to maintain this perception.</p> |  |                  |               |             |

| <u>OPUS Reference</u>   | <u>Site Name/Location</u>                                    | <u>Post Code</u> | <u>Parish</u>                         | <u>Type</u> |
|---|--|------------------|---------------------------------------|-------------|
| 1223  | KFC and car spares, 96 Oxford Road                           | UB9 4DW          | Denham                                | Brownfield  |
| Already developed. No objection to redevelopment.   |  |                  |                                       |             |
| 1286  | Ashwell's Farm, Chalfont St Giles                            | HP8 4JB          | Chalfont St Giles / Chalfont St Peter | Greenfield  |
| As the Study notes, the site of Ashwells Farm includes a Grade II listed farmhouse and Grade II listed barn and that <i>"An assessment will be required to determine whether the site contributes to the setting and significance of these heritage assets, including consideration of the potential effects of development proposals (subject to the outcome of the current Inquiry)"</i> .  |  |                  |                                       |             |
| 1307  | St Huberts Lane  | SL9 7BZ          | Fulmer & Gerrards Cross               | Mixed       |
| 3105  | Land at Chalfont Park, Gerrards Cross                        | SL9 0QA          | Chalfont St Peter                     | Greenfield  |
| CVRP disagrees with the grey belt assessment. This parcel if developed would be isolated from all other development, adjacent to a business park and disconnected from Gerrards Cross and Chalfont St Peter by woodland and the A413 dual carriageway. Pedestrian access to the site is a particular problem and at present depends on a crossing on the A413 that is a short distance away from a busy roundabout on the edge of Chalfont St Peter.  |  |                  |                                       |             |
| 3174  | Land at Market Garden Farm and Land at Thorney Stables, Iver | SL0 9BD          | Iver                                  | Mixed       |
| <ul style="list-style-type: none"> <li>• Grey belt designation should be reassessed as part of the separation between Iver and the urban area of Hillingdon, and in the wider context of protecting the Green Belt around London.</li> <li>• There is a large amount of existing development on this site much of which is unlawful. This should not be considered as regularising the situation.</li> <li>• Residential development here would be severely affected by noise from the motorway.</li> </ul> |  |                  |                                       |             |
| 3280  | Denham Green Nursey  | UB9 5EY          | Denham                                | Brownfield  |
| 3302  | Land adjacent North Lodge, Lower Road, Chalfont St Peter     | SL9 8LA          | Chalfont St Peter                     | Greenfield  |
| 3406  | Land at Pinstone Way, Denham, Bucks                          | SL9 7BJ          | Denham                                | Greenfield  |
| Development of this land for housing must comply with the Golden Rules by contributing to adjacent Caps Wood  |  |                  |                                       |             |
| 3743  | Land west of Lodge Lane, Little Chalfont                     | HP8 4AJ          | Little Chalfont                       | Greenfield  |

| <u>OPUS Reference</u>  | <u>Site Name/Location</u>   | <u>Post Code</u> | <u>Parish</u>     | <u>Type</u> |
|--|---|------------------|-------------------|-------------|
| 4398   | Land at Three Oaks Farm, Roberts Lane, Chalfont St Peter          | SL9 0QR          | Chalfont St Peter | Mixed       |
| 4400   | Land south of Thorney Farm, Thorney Mill Road                     | SLO 9AH          | Iver              | Greenfield  |
| There is already planning permission for development of part of this site.   |   |                  |                   |             |
| 6534   | Land to the North of M40 Junction 1 Roundabout, Denham, UP9 5PG   | UP9 5PG          | Denham            | Greenfield  |
| <ul style="list-style-type: none"> <li>We disagree with the Provisional Grey Belt assessment here. There is a strong perception of open space for London residents as the Colne Valley opens out when travelling from east to west on the A40 (and vice-versa = large taste of open space before you enter London). Surely this is exactly the type of area that Green Belt policy was designed to protect when originally established.</li> <li>Any residential development here will experience severe adverse effects of noise from the several major roads meeting at Junction 1 of the M40. This will be intensified by traffic pulling away from the several sets of signals here</li> </ul>   |   |                  |                   |             |
| 6541   | Land North of the M40 & both sides of Denham Court Drive, UB9 5DB | UB9 5DB          | Denham            | Greenfield  |
| <ul style="list-style-type: none"> <li>There is an internationally-rare chalk stream immediately adjacent to the site. We disagree with the Provisional Grey Belt assessment here. There is a strong perception of open space for London residents as the Colne Valley opens out when travelling from east to west on the A40 (and vice-versa = large taste of open space before you enter London). Surely this is exactly the type of area that Green Belt policy was designed to protect when originally established – this is about as far away from a ‘disused car park or abandoned petrol station’ as you can get.</li> <li>Any residential development here will experience severe adverse effects of noise from the several major roads meeting at Junction 1 of the M40. This will be intensified by traffic pulling away from the several sets of signals here.</li> </ul> |   |                  |                   |             |
| 6565   | Tendercare Nurseries, 18 Southlands Road, Denham                  | UB9 4DG          | Denham            | Brownfield  |
| 6577   | Land west of Iver Heath   | SLO 0RA          | Iver Heath        | Greenfield  |
| A high voltage electricity cable runs through part of the site which needs an exclusion zone. A planning application has already been submitted for the southern area.   |   |                  |                   |             |
| 4296   | Land Adjacent To Uxbridge Road George Green Wexham                | SL2 5NH          | George Green      | Greenfield  |

## Expansion of Chalfont St Peter

In summary the proposal for a large-scale housing development on the edge of Chalfont St Peter would raise substantial concerns on several grounds and we consider that it is not an appropriate site for what is proposed. The proposed expansion conflicts with CVRP's objectives, is inconsistent with the aims of the Regional Park, and if it went ahead would cause substantial harm to the Green Belt and, in turn, to the Regional Park.

The proposal sits across three different assessment areas in the Green Belt study:

- OGB38a-1, Provisional Grey Belt – much of the site area;
- CPGC002 Grey Belt - the existing built-up area; and
- CPGC003, **not** Grey Belt, north of Rickmansworth Lane

This Provisional Grey Belt designation seems highly questionable given the role that the land currently plays in checking sprawl on the edge of a large settlement. Indeed this is reflected in the assessment of Green and Grey Belt circulated as part of the consultation, which refers to *"East of Chesham Lane (the proposed site)..there is a concern regarding settlement separation being eroded over time... large scale development in this section would be associated with challenging containment and, in turn, a risk of sprawl"* (Section 7.2.31). We agree with these observations and consider that the land does not meet the criteria for designation as Grey Belt.

In the context of the whole plan area of Buckinghamshire, there is no justification for releasing it from the Green Belt for large-scale development.

Other major concerns with this proposal are:

- **Wastewater treatment:**
  - As the Council will be aware in recent years wastewater disposal has been a major concern in Chalfont St Peter, caused by the failure of investment in drainage infrastructure to keep pace with the growth of the settlement. In recent winters this has led to sewage being pumped into the River Misbourne (a rare chalk stream), which in the winter of 2024 led to a major road through the village being closed and tankers being permanently onsite for a lengthy period to remove sewage that would otherwise flow into the river. Any substantial new development would risk making these problems worse.
  - In this context there is a reference to the Maple Lodge Sewage Treatment Works, and it having been assigned a green "capacity for growth" rating, while also noting that it serves a substantial area of South West Hertfordshire. This conclusion seems to be at odds with the reality of an overloaded, antiquated facility that struggles to cope with the amount of sewage that it is required to process, which regularly leads to discharges of sewage into the River Colne. A recent article in the Guardian explains this in more detail - <https://www.theguardian.com/business/2026/feb/24/people-yearn-for-stability-the-thames-water-sewage-plant-at-frontline-of-its-crisis>. An indication of the extent of this problem is apparent from data showing that in the period 2021-24 there were 263 sewage spills over 155 days (taken together amounting to a period of approximately five months). Full details are at <https://www.floodmapper.co.uk/data-explorer/search-sewage-report/4a72d262-aaf8-11ee-baa2-0242ac140003/Maple%20Cross/historical>.

- There is a reference to the possible need for additional sewers and that this might raise legal issues regarding easements and access to land. Waste water disposal generally is an enormous issue in this part of the Park, and a large additional housing development would be very likely to make the situation worse. Given Thames' Water's track record CVRP is very sceptical that sufficient additional investment would be forthcoming to avoid further strain being placed on a system that is unable to cope now. An immediate consequence of this for the Park is that access to the river at the Denham Visitor Centre has been blocked off for several years now because of the high level of pollution - a facility that used to be enjoyed by families during the summer months - and a new large-scale development would do nothing to improve this.
- In these circumstances, with the existing sewage facility clearly unable to deal with the amount of processing required of it, a major new housing development would inevitably add to the substantial problems that already exist to the detriment of the Colne Valley Park and those who live and work in it.
- **Traffic and travel:** The proposal also raises concerns about connectivity and congestion:
  - The site would be a 15-20 minute walk away from the centre of Chalfont St Peter and its facilities, and there is only a limited bus service that would serve the site. As a result most local journeys would take place by car.
  - The local network of roads - Chesham Lane, Rickmansworth Lane, Brawlings Lane and Gorelands Lane (which would link the site with Chalfont St Giles and Little Chalfont) are not main roads and would struggle to accommodate substantial additional traffic. Sections of Rickmansworth Lane are narrow and require cars to slow down when they pass, and in parts of Gorelands Lane there is only one room for one car to pass at a time.
  - The narrow lanes cannot accommodate extra footways or cycleways, so making walking and cycling difficult and unsafe. Even if the rural lanes could be widened, with added street lighting, for safe sustainable travel, this would result an undesirable urbanisation of their character.
  - The study suggests that the site has a high level of connectivity based on a score of 45.83 using the DfT tool. This is the score at the west and south access points to site, while the north and east access points fall to the mid 30's, similar to scores within the site. Based on detailed local knowledge, this score can only be taken as a high-level indicator among the range of other factors set out above.
- **Landscape:** The Chilterns National Landscape abuts the northern perimeter of the site. Since this is on land rising slightly away from the site it is difficult to see how views over the development out of the Landscape can be mitigated.
- **Cross-boundary matters:** Any allocation of this site should be considered in the context of a possible site promoted through the Three Rivers draft Plan at Catlips Farm, Chorleywood (site CFS13, 34.5 ha). The Council should engage with Three Rivers on the cumulative impacts of the two sites (especially regarding wastewater) and maximise comprehensive mitigation.

This would be the very worst kind of development for the CVRP - sprawl on the edge of an existing large settlement that would generate substantial additional pressure on transport and waste disposal in particular. Overall, taken together with other current and planned developments within the Park this would be a further blow to the viability of the Park including the idea of "green corridors".

### Green Belt study

We have some comments about the methodology of the Green Belt study. The Trust would have been very grateful to have been engaged with in the methodology here, and it is regrettable that the Council did not engage more widely beyond the adjacent authorities. Particularly, it appears that comments were not received from LB Hillingdon. It also appears that the Council did not invite comment from the Greater London Authority.

The CVRP occupies a key 'inner' part of the Metropolitan Green Belt, and we have significant experience of how Green Belt policy has worked (or not) over recent decades. The CVRP occupies a narrow tranche of the Green Belt here, between large urban areas (notably Heathrow/ Uxbridge/ West Drayton and Slough). The CVRP represents a strategically important part of the Metropolitan (London) Green Belt because it acts as the first taste of countryside west of the capital, offering access to a large area of natural environment, with all the potential mental and physical health and wellbeing benefits this can bring to the 10 million people who live within 15 km of it.

The location of Buckinghamshire's part of the CVRP's Green Belt gives it a 'strategic' importance in relation to London and the urban areas beyond London. This should be brought out and clarified within the emerging Local Plan and in any review of the Green Belt.

Whilst the Green Belt is of great importance to the future planning of Buckinghamshire, its role (and potential) for the capital should also be a fundamental factor driving the emerging Plan. The CVRP's natural environment should be seen as key to the future well-being of people and wildlife.

### Fundamentally undermining the remaining Green Belt

The scope of this aspect of the assessment has been limited to settlements within Buckinghamshire or abutting its borders. This fails to acknowledge the strategic context of the Metropolitan Green Belt.

It is clear from figure 7.1 that if all the areas in the eastern part of Buckinghamshire identified as Grey Belt or Provisional Grey Belt were developed, there would be a strategic undermining of the Metropolitan Green Belt in respect of London itself. We recognise that the PPG refers to undermining the remaining Green Belt **in the plan area**: but the study should surely not overlook the role of London, and a proportionate (i.e. generous) approach should be taken to preserving the Green Belt in that context.

The built-up areas of Uxbridge and Yiewsley extend right up to the Colne and it would be very damaging for development from Buckinghamshire to further encroach into the valley.

Discussion of the eastern and southern areas in paragraphs 7.2.35 and 7.2.36 tends to be limited to seeking out potential revised boundaries for the Green Belt rather than considering what extent of development would be acceptable here. There is some discussion in 7.2.40 of the strategic context, but it could be much more fully developed. The study should explicitly name-check the CVRP with reference to 'realising growth opportunities including in terms of green / blue infrastructure given a collection of assets of at least sub-regional significance'.

### Defining towns

We note that the study draws on the 2025 Settlement Review to define which settlements deserve separation. In this analysis, Iver (pop. 3265) is a Tier 3 settlement while Iver Heath (pop. 5157) is a Tier 4 settlement, presumably by reason of having a slightly lower assessment of non-key services. The Trust

believes that Iver Heath should be considered a town in terms of the Green Belt assessment and therefore the Grey Belt assessment of some sites (OPUS numbers 10, 213, 307, 3148) should be reconsidered.