

APPENDIX A: Consultation Responses and Representations

Councillor Comments

Cllr. Paul Griffin:

Strongly object to this proposal on the following grounds:

1. This is Greenbelt. Buckinghamshire Council has made a commitment to retain Greenbelt unless an Exceptional Circumstance prevails. I do not believe that a service area on the M25 is an Exceptional Circumstance.
2. The proposed development will compromise the Iver Conservation Centre which has been in situ for some 30 years and unlike this proposal it provides education on and celebrates nature rather than detracting from it.
3. The land is highly likely to flood, as it is flooded right now. Where will this water go and how will we cope with extra millions of gallons flowing into our already overwhelmed water system? This water will have to go somewhere and I don't see where it can go!
4. The residents of The Ivers by way of a survey on social media have voted and 3 out of 4 do not want this application to proceed.
5. This site is approximately 20 to 25 minutes drive from a similar facility.
6. This is a 24-hour facility which will generate considerable noise and pollution to the area and particularly at night when all noise 'travels' more than at any other time. Residents within a mile of this facility will have their sleep patterns disturbed and their air quality compromised.
7. The Ivers are an AQMA - this will make the situation worse regardless of how many electric vehicle charging points it has!
8. There is no need for this facility and it is being promoted purely to make a revenue stream for the Council and the developer. No amount of money will bring the Greenbelt back and if we keep chipping away at it will soon all be gone.

Response dated 18th August 2021

There are so many reasons to object to this application but they boil down to two major factors. Firstly, there is no need for this facility as agreed by Parish Council, public opinion, Highways England and Buckinghamshire Council. Secondly the proposal is for lands that are designated as Greenbelt and to develop land with such a categorisation requires an exceptional circumstance. An exceptional circumstance cannot be called where a 'need' has not been defined. The proposal fails on the most basic of criteria, as it has over the years. This is not the first, nor will it be the last but all have been rejected as there is no defined need. The leadership of Buckinghamshire Council supports this proposal purely for the potential revenue stream.

Cllr. Luisa Sullivan:

Firstly, I would like to register my objection to this application. This site sits on the boundary line of Green Belt protected land. Protection to prevent the urban sprawl of London into the rural communities and villages of Buckinghamshire and surrounding counties.

Whilst the location of the site affords connection to the M25, we have defended any development of an MSA over many years in this specific area of Green Belt, as the Highways England and DFT have suggested that the area is already over congested and populated with road network. The application states there will be no local road access, but the site proposes access, deliveries, and staff entrances at the A4007, Slough Road. This is a single road and access to this road would only be achieved through bringing traffic along Iver Heath residential roads which currently there are vehicle weight restrictions in the locality.

Why is there not a proposed staff access route from the other side of the proposed site. On a dual carriageway link road (Denham Road A412) that is closer to the motorway and A road network, without the density of properties. Thus, avoiding the residential built-up area of Iver Heath. The application design states that there will be no local traffic access for the proposed MSA as the customer access to the MSA will only be on and off the M25 directly. However, the application states that goods deliveries, staff access and associated works will be through a single designated barrier-controlled access along the A4007/ Slough Road. At the Chandlers Hill area of Iver Heath. This area and the access to this point from Buckinghamshire access roads will mean the traffic will need to pass through the Ivers AQMA, an air quality management area, designated to protect and regain controls of the air quality in the parish. This application has not considered this point that any increases to pollutants in the parish of Iver needs to be mitigated and controlled. The site has not considered the carbon footprint of the scheme whereby bringing goods delivery and staff traffic up into a village from the motorway and A road network has been ill considered and not planned properly with the local network inefficiencies.

For many years local Cllrs have been engaging at parish, district, and county council levels to formally recognise, agree and move forward on plans to create a blueprint for a highway network of congestion relief for the Ivers locality. South Bucks District Council had engaged with the DFT, government ministers and Highways England, to consult and consider this blueprint of additional road network. Those authorities were supportive of an additional connection to manage local congestion. This application site drives through that suggested local desire that could help to alleviate local traffic congestion for the Ivers which is under road network pressures. This is due to the lack of any local member input into this application.

Lastly, I wish to put forward mitigation requests on this application.

- Requesting acoustic sound barrier protection along the length of the proposed site from Richings Park and along to Iver Heath fields to protect all parish residents.
- Lighting protection, to ensure the glare and distraction of the lighting on the proposed development is not detrimental to residents.
- Restrictions and strict control on delivery times. No deliveries on Sundays and formal holidays. No deliveries outside daytime hours.
- Mitigation funds/ financial legacies towards enhancing and developing surrounding green space and investment in leisure and recreational facilities for the local community.

- Mitigation funds/financial legacies towards the Iver Environment Centre, to enhance and protect their educational activities for current and future generations.
- Mitigation funds/ financial legacies for the Regional Colne Valley Park CIC to continue their environmental work projects and allow future projects in the site locality.
- Mitigation for enhancements and upgrades to surrounding footpath network in allowing access to the proposed open green spaces. Improvements and upgrade to local drainage and water waste.

I would support the many letters registered by residents, expressing their concerns, and ask that these are considered carefully. And any further elements of mitigation requests are fully considered.

Response dated 18th October 2021

After perusing the content submissions of this application I wish to register objection points for consideration by officers and committee. whilst the primary application for this site is for an MSA, we believe locally that this application will be detrimental to the locality as the exit and entrance routing is detailed, Denham Road A412 into Bangors Road North (weight restricted road) up joining the Slough Road A4007.

This routing is detrimental to the AQMA zone and detrimental to the local residents quality of life. The better routing would be in using already existing current quarry land routing across the bottom of the dual carriage way Denham Road land accessed through Summerleeze quarry site.

This would prevent excessive vehicle journeys into the Iver Heath settlement. I object to this application as the application does not comply with the councils mineral extractions policy. This site does not comply with a need to extract for special circumstances. a revenue scheme, to supply an MSA on this site, will not be compatible as the motorway network cannot safely accommodate this infrastructure at this site. As historically confirmed in public enquiry documents from years past.

Cllr. Wendy Matthews:

I object to this application on which is sited our valuable green belt. It will have a significant impact on this narrow corridor of green belt between Iver Heath and Uxbridge and will therefore contravene one of the purposes of the green belt. It will result in a loss of agricultural land therefore impact on the economic viability of the local business.

The impact on the local community in terms of increased traffic, noise and light pollution is unacceptable.

It will directly impact on the adjacent Environmental Centre which serves our local community well and exacerbate the flooding issues which already exist in the area.

This site is in green belt and on good agricultural land. It is located within a narrow strategic gap in the green belt which is all that separates Iver and Uxbridge. The junction onto the M25 is too close to others causing problems for traffic on the motorway and there are other service areas that can be used within an acceptable distance. The impact on the local area will be significant with no benefit. There are low levels of unemployment in The Ivers and staff will inevitably have to travel to the site from some distance via our local roads. I am totally opposed to this scheme.

Response dated: 28th September 2022

This site is in green belt and on good agricultural land. It is located within a narrow strategic gap in the green belt which is all that separates Iver and Uxbridge. The junction onto the M25 is too close to others causing problems for traffic on the motorway and there are other service areas that can be used within an acceptable distance. The impact on the local area will be significant with no benefit. There are low levels of unemployment in The Ivers and staff will inevitably have to travel to the site from some distance via our local roads. I am totally opposed to this scheme

Right Honourable MP for Beaconsfield – Joy Morrissey

I am writing to object, in the strongest possible terms, to the planning application (referenced above) for a motorway service area to be built in Iver.

First and foremost, this development would destroy a swathe of Green Belt land in an area where green spaces are already under very significant pressure. The loss of this land would have a cascading effect, weakening the protection of other nearby land, which would be orphaned by this development. Further to this, there is no possible mitigation that would compensate for the loss of this amount of Green Belt land, in this location.

This development would compound a number of issues that are already putting pressure on the health and wellbeing of local residents. The level of traffic flow through the surrounding area is very high, causing problems of road safety, congestion, noise pollution, and air quality. Every one of these problems, which are without sufficient mitigation before this development, would be substantially worsened were it to be approved.

Further to this, a similar proposal was made for an Iver MSA previously, which was subject to a full public enquiry. The result of that process was a determination that an Iver MSA would be inappropriate, for a number of reasons, most of which are still extant. In fact, pressure on the Ivers and particularly their natural environment and green spaces has increased since that time. If it was not appropriate then, it certainly wouldn't be now.

Specifically, the placement of the proposed site will eradicate the one remaining buffer of green space between Iver Heath and Uxbridge. This is not only an intrusion into the countryside but a clear example of the kind of urban encroachment that the Green Belt was implemented to stop. I have no desire to see London start to swallow up the south of Buckinghamshire, an unwelcome but inevitable consequence of approval being granted to this application.

The Ivers Parish Council Comments

Letter dated 10th March 2021:

The Ivers Parish Council objects strongly to this proposal for a Motorway Service Area following the extraction of minerals and connection to the M25.

1. Green Belt

The site comprises 46ha of Green Belt farmland in the Colne Valley Regional Park (CVRP) which provides buffers between the M25 and Iver Heath and between Iver Heath and Uxbridge. The purposes of Green Belt are well known and set out in the NPPF which is intended to afford Green Belt the highest possible protection against development. This area has been identified in the emerging Ivers Neighbourhood Plan as a Corridor of Significance to be protected from development.

The Motorway Service Area (MSA) is no exception, it is inappropriate development in Green Belt

2. Colne Valley Regional Park

The Ivers sit entirely within the CVRP, supports the CVRP objectives and endorses the CVRP response to this application. The CVRP exists to protect and promote the countryside, farming and biodiversity and in this very narrow region of the Regional Park these objectives are vital to ensure the integrity and functionality of CVRP for people, the environment and biodiversity.

The removal of 'pasture grassland' is the removal of an irreplaceable resource that currently contributes to mitigation of climate change. Undisturbed by development it has potential for improvement.

The proposal will remove and build over at least 46ha of Green Belt, together with the destruction of established planting along the M25, removing a functional biodiverse feature and wildlife corridor that has taken 25 years to establish.

The MSA will destroy Mansfield Farm, it will no longer be viable. The economic loss of this business and the consequent loss of employment needs to be weighed against any assessed benefits. It will be impractical to farm the remaining northern section. This leaves the land vulnerable to the sort of urban fringe degradation all too common in The Ivers where fly tipping is out of control and unlawful uses of 'pasture grassland' defy enforcement action.

Another application for the temporary use of Green Belt for a construction site will also be required. There will be cumulative destruction of Green Belt in The Ivers, an area already under extreme pressure from development

The ability of the CVRP to fulfil its objectives will be compromised in The Ivers.

3. Iver Environment Centre and Mansfield Farm Buildings.

Access to both sites will be so threatened, first by construction traffic using the access road and then by the operation of the MSA, that there is a risk to their continuing existence and function

The significance of the farm's historic buildings appear to have been dismissed by Historic England though all three are Grade II listed. They must not be allowed to deteriorate.

The Environment Centre is an environmental educational charity that also attracts volunteers and raises funds providing the classes and hosting children's parties.

The mitigation proposed extends only to screening and accepts that noise will be increased both for the Environment Centre and Mansfield Farm.

Any changes that Highways England require to the slip roads will impact Mansfield Farm and the Environment Centre - these impacts will need to be assessed and compensated. A full assessment of the effects on these assets is required and a comprehensive long term mitigation plan developed.

4. Ecology and Biodiversity

Field surveys were carried out for reptiles, bats, birds and mammals but not for invertebrates. As there are bats foraging on site there will be insects and the larval stages are often found in soils. The removal of soils and the organisms living there will deplete the food source for birds and bats.

Invertebrate field surveys are required to assess the baseline insect population and inform the planting scheme to optimise a recovery of the population.

The damage to the Alder Bourne caused by additional culverting requires a different solution. It is vital that the many drains and ditches that eventually feed the Alder Bourne are unimpeded and not contaminated. They should be improved if necessary so that wildlife continuity is enhanced and risk of flooding reduced. Specialist advice is essential.

An environmental monitoring and management plan for at least 30 years is necessary to guarantee the success of all biodiversity measures on the entire Mansfield Farm site as it exists now. Reporting regularly to a liaison group.

Biodiversity net gain in excess of the minimum is welcome and should aim to improve on the variety of species of animals, insects and flora on residual Mansfield Farm.

5. Mineral Extraction

The Buckinghamshire Minerals and Waste Local Plan (To 2036) does not identify Mansfield Farm as a mineral extraction site. This proposal for the extraction of minerals is contrary to Buckinghamshire Council's policy. Despite the enabling work required to extract minerals to create the level site, the details are not easy to find.

In the Planning Statement, 1.4.9 refers to a Minerals Assessment in support of the application. It states that that "... there could be circa 341,000m³ of saleable mineral won and exported from the western parcel of the Site to achieve the desired landform. This would effectively equate to recovery of the full, workable mineral deposit." ES Vol1 ch 4 describes the construction phase at 4.14.4 Groundworks in months 3-6, soil stripping and extraction; for the retention of some material for use in construction. "The remainder would be exported off site." HGV traffic to export the material is expected to peak at around 250 trips per day. This to be the subject of a separate planning application.

As the construction of the MSA is dependent upon the excavation of minerals the permission for that should be in place first. When will the separate planning application come forward?

The destination and route for the material is critical, there must be none of the associated aggregate, construction and HGV traffic on The Ivers' roads.

If the route to Summerleaze is "cross country", as stated at a public webinar, that will require a haul road on land in Buckinghamshire Council's ownership and further loss of Green Belt in The Ivers.

The enabling works for the MSA will be as devastating to the environment, ecology and Green Belt and as disruptive to residents of The Ivers, particularly in Iver Heath, as the construction and operation of the MSA.

Vol 5 of the Environmental Statement, Non-Technical Summary at para 3.2.7 includes the information, "the Applicant did not study further sites in great detail, as other locations self-evidently did not / could not meet the same determinants" Did those determinants not include the opportunity to exploit the mineral resource?

6. Transport Assessment

Due to Covid 19 disrupting normal traffic patterns, 2019 data has been extracted from the Pinewood application for realignment of Seven Hills Road.

One conclusion from that is that junctions at Five Points with Church Road and at Church Road with Bangors Road North are known to be over capacity regardless of the proposed redesigned junction on the A412 at Seven Hills Road. This indicates that the A412 is an unsuitable route through Iver Heath for any additional construction traffic.

The whole of The Ivers is an Air Quality Management Area (AQMA). The A4007, between Five Points Roundabout and Bangors Road North/ South junction is a residential road included in The Ivers AQMA. It serves Iver Heath Infants' School and Nursery, a parade of shops and has seven road junctions to residential roads or cul de sacs. From the A4007, a footway near the shops and Footpath IVE4/1, both lead through residential roads to Iver Heath Junior School, Iver Heath Medical Centre, Library and Village Hall.

There is permitted redevelopment for housing and road re-alignment at Grosvenor Close. Neither the A412 nor the A4007 through the village of Iver Heath are suitable for any construction traffic.

ENVIRONMENT VOL 1 13 TRAFFIC AND TRANSPORT - ES VOLUME 1 - MAIN REPORT

There appear to be some errors in this report.

Two tables labelled 13.7:-

Table 13.7: 2030 Baseline 2-way Traffic including Committed Developments

Table 13.7: Sensitivity of the Assessed Highway Links

Table 13.7 Sensitivity of the Assessed Highway Links

Link ID Ref 5, (Pinewood Road, north of A4007 Slough Road junc), Is shown as not sensitive to change for the reason "No footpaths close to the junction and limited residential properties."

This is incorrect, there are footways connecting all the single carriageway roads and a shared use path from the A4007 junction, Five Points Roundabout, north along Pinewood Road to Pinewood Studios and Black Park.

Link ID Ref 5 is sensitive to change.

Link ID Ref 6, (A412 Uxbridge Road, west of A4007 Slough Road junc) also shown as not sensitive to change.

It is sensitive to change between Five Points Roundabout and Black Park equestrian and cyclist entrance to the bridleway WEX/21/1 at Black Park on the eastbound A412.

It is sensitive to change westbound on the A412, between Five Points Roundabout and just west of Billet Lane and the equestrian entrance to the bridleway WEX/24/2 at Langley Park.

Cyclists and horse riders cross the central reservation of the A412 to the bridleways. The presence of horse riders is indicated by a road sign on the A412.

There is also an informal pedestrian gap in the central safety barrier, between the petrol station and shop and the properties on the eastbound carriageway.

The section of the A412 west of Five Points Roundabout, both carriageways, is sensitive to change between Five Points Roundabout and the bridleways into Langley Park and Black Park. The footways are used by pedestrians, runners and cyclists.

Link ID Ref 6 is sensitive to change. Any increase in traffic will increase intimidation and danger for pedestrians, cyclists and horse riders.

Link ID Ref 14 (A4007 Slough Road east side of M25) "No residential properties close to the road. Although there is a footway along the southern side it is considered that this is infrequently used."

This cannot be assessed as not sensitive to change if it is intended to install a shared use path and a central pedestrian refuge to provide for staff access to the MSA. This route is also shown to have the greatest increase in traffic of 800+ vehicles to 2030 in a 60mph limit.

The sensitivity assessments must be corrected.

Table 13.4: 2020 Baseline 2-way Traffic

There are concerns at the HGV counts at Link 2 and 10. Both refer to Bangors Road North between The A412 and A4007 where there is a 7.5t weight restriction. With no major development this seems a high number to be requiring access/loading.

The weight restriction must be recorded in the transport assessment and observed by contractors.

Similar comments apply to Link 11, Bangors Road South where there is also a 7.5t weight restriction.

The additional aggregate and construction traffic must not be routed through The Ivers. Existing developments in The Ivers and HGVs based at industrial sites within the villages, already contribute to excessive HGV movements, poor air quality, noise, pollution, damage to roads, highway infrastructure and verges. The 'significance' figure being less than 10% is entirely due to the existing high proportion of HGVs on unsuitable roads.

7. M25

Many documents refer to potential M25 improvements, the responsibility of Highways England (HE). HE have raised questions about the structural requirements for the bridges affected should the MSA be approved and have questioned the design of the slip roads to serve it. More land may be required in order for HE to approve connection to the M25.

As the construction of an 'on line' MSA, is dependent upon decisions by HE, there must be certainty about the M25 improvements and design before the MSA is approved.

8. Motorway Service Area

The development of a destination MSA on the outskirts of Slough and Uxbridge is unnecessary. The hotel is not necessary in such a location and it should be removed from the plans. The expected traffic during the operation of the MSA, over a 24-hour period for 365 days a year, will impose an additional burden on The Ivers. Not only traffic but noise, light, pollution and disturbance.

While the HGV provision may be welcomed by some drivers, there are many who will not afford the facilities, some drivers who cannot afford them. The space provided is excessive and, as arranged, lighting will disturb any wildlife remaining at the northern edge of the site.

The drive through element will almost certainly increase the amount of litter, both in the immediate vicinity but also distributed by fast moving traffic and some will arrive in The Ivers. The embankment of the A4007 overbridge is an example. Litter on such sites is difficult to clear.

Given the global concern with Climate Change and the Government emphasis on protecting and improving landscape for people, and biodiversity; the Government commitment to a Green Economy; it is incomprehensible that 46ha of Green Belt in a vulnerable and fragmented section of a Regional Park should be considered as a suitable place for a car park of about 20 ha with added attractions.

This application is dependent upon the potential M25 widening and engineering considerations outlined by HE. It is also dependent upon a successful application to extract and remove minerals. Though only in outline this application for a Motorway Service Station is premature and must be refused until there is certainty with M25 widening and other applications to enable the MSA are approved.

There is a risk that mineral extraction will progress before all other permissions are in place. A bond must be negotiated to ensure restoration of the site with associated biodiversity net gain, off site if necessary, should the MSA not be built.

In the event that this application is recommended for approval, substantial mitigation will be required.

- i) Any development proposal that will generate an increase in traffic in the Richings Park, Thorney, Shreding Green, Wood Lane, Iver Village, Iver Lane and Iver Heath areas will be required to contribute to public realm improvements and traffic mitigation measures at Key Locations. (Emerging The Ivers Neighbourhood Plan)
- (ii) Provision of cycleway between Potters Cross and Uxbridge, giving access to the canal towpath.
- (iii) A contribution of £250,000 to progress the development of active travel routes in The Ivers See WGFC Report (The Working Group on Footpaths & Cycleways) adopted by TIPC.
- iv) Any disadvantage to Iver Environment Centre as a result of mineral extraction must be compensated.
- v) Financial Contribution of £100,000 to install green energy technologies at TIPC buildings
- vi) Financial Contribution of £215,000 for the development of open spaces and playing fields throughout the parish.
- vii) Welcome Break and its partners agree to offer 5 apprenticeships per year for each of the first 5 years of this development and operation to residents of the Ivers Parish. The apprenticeships are to be offered in the professional fields of Project Management; Construction; Hospitality; Business and Management. These apprenticeships will be at least of a Level 4 qualification, including a funded degree apprenticeship approach.
- viii) Once the site is ready to be operational - all jobs available be advertised first to local residents of The Ivers Parish.

Letter dated 16th August 2021

We note the recent changes made to the original development application and that these address some concerns. However, our key concerns remain and on this basis our objection to the development application is submitted.

In summary:

This development on the Green Belt is unnecessary with significant adverse impacts on biodiversity. This view is supported by numerous well qualified and appropriate bodies who have also submitted objections to this development.

Significant extraction of non-renewal minerals, this is inconsistent with United Nations Sustainable Development Goals (UN SDG) and UK Government legislation and a policy of “Build Back Green” announced by the Government. In terms of the UN SDG we draw your attention to goal 12 – Responsible consumption and production, and to goal 15 Life on Land. Both of these goals are severely compromised by this development application.

Increase in traffic through the local communities both during construction and operation – where roads are already stressed, and the level of HGV traffic is excessive. Once again numerous other bodies have provided evidence on this and data is available to show the current over capacity loading on some of the local roads that will be impacted by this development, especially during the construction phase.

It is noted in the technical assessments filed with the development application that there will be a negative impact on local air quality. This would occur in an area with existing poor air quality and indeed Buckinghamshire Council has declared the local area as an Air Quality Monitoring Zone. The technical assessments note that air quality will further decline and then the author attempts to dismiss this decline as insignificant. Therefore, the applications own study shows that the development would contribute to poor air quality.

To illustrate our point regarding existing air quality issues please refer to figure 1 (below), which shows the results of the Iver Heath Residents Association monitoring of air quality (2017 -2019). On many occasions $40\mu\text{g}/\text{m}^3$ level has been exceed and on many more occasions this level is nearly reached. Recently monitoring undertaken during Covid-19 lockdown period (April 2020 to April 2021) show that 4 areas still exceed / nearly exceed the $40\mu\text{g}/\text{m}^3$ threshold. These sites are Junction of Pinewood Rd and Pinewood Green; Junction Bangors Rd South and Slough Rd; Junctions of Church Rd and Pinewood Rd; Junction of Church Rd and Bangors Road North.



4.2 Results: sites with highest monthly readings

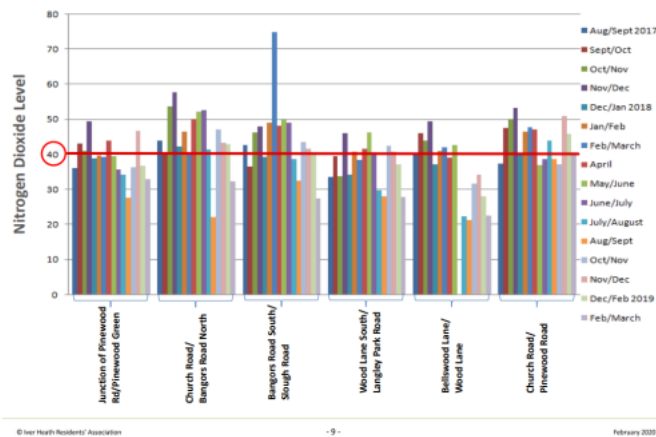


Figure 1. Air Quality Monitoring undertaken in Iver Heath – frequently exceeding legislated limits

We also note that the Highways England response included in the submission states that the site of the services will be “... beneficial to a limited portion of drivers” (item 3 Highways 2021). Therefore, the site is not desirable for its stated purpose, nor has the case for its need been adequately made. Additionally, this point was also considered and found to be relevant in relation to the MSA proposal in the Chalfont area. That proposal was not supported by Council.

This development application provides little benefit to drivers and has significant detrimental impacts to the environment and quality of life for those who live nearby. We submit our objection to this development application.

As required, we have set out a range of mitigations should Buckinghamshire Council be minded to approve this development application. Please see attachment A which has this listing.

In the event that this application is recommended for approval, substantial mitigation will be required.

i) Any development proposal that will generate an increase in traffic in the Richings Park, Thorney, Shreding Green, Wood Lane, Iver Village, Iver Lane and Iver Heath areas will be required to contribute to public realm improvements and traffic mitigation measures at key locations. (Source: Emerging The Ivers Neighbourhood Plan).

(ii) Provision of cycleway between Potters Cross and Uxbridge, giving access to the canal towpath.

(iii) A contribution of £250,000 to progress the development of active travel routes in The Ivers See WGFC Report (The Working Group on Footpaths & Cycleways) adopted by TIPC. iv) Any disadvantage to Iver Environment Centre as a result of mineral extraction must be compensated.

v) Financial Contribution of £100,000 to install green energy technologies at TIPC buildings to assist to offset the emissions generated from this development.

- vi) Financial Contribution of £215,000 for the development of open spaces and playing fields throughout the parish to assist to offset the emissions generated from this development and provide quality of life offsets to the community.
- vii) Welcome Break and its partners agree to offer 5 apprenticeships per year for each of the first 5 years of this development and operation to residents of the Ivers Parish. The apprenticeships are to be offered in the professional fields of Project Management; Construction; Hospitality; Business and Management. These apprenticeships will be at least of a Level 4 qualification, including a funded degree apprenticeship approach.
- viii) Once the site is ready to be operational - all jobs available be advertised first to residents of The Ivers Parish. This exclusive recruitment period is to be of sufficient duration for the recruitment process to consider and select these applicants before advertising more widely. Local employment results in less emissions when travelling to work and will assist to offset the emissions generated from this development.
- ix) Significant contribution to be made by the developer to the Colne Valley Regional Park for implementation of the Colne Green Infrastructure Strategy

Letter dated 30th June 2022

The Ivers Parish Council objects to this application, we also request a call in. The previous comments we have provided as grounds for our objection to the earlier version of this application continue to apply. We note that there have been changes to the application however, these are insufficient to change the Parish Council's view.

The new application fails to address some significant material planning concerns. The environmental impact statement does not note the presence of the Great Crested Newt. The application also claims the area is not impacted by flooding, our earlier comments noted that flooding was common knowledge within the local community. We note that others who have commented on this application have provided photographic evidence of the flooding.

We also note that Thames Valley Police have objected to the application, noting their experience with the difficulties in policing a nearby motorway services and access issues to the proposed services area. Equally, Highways England is not supportive of this application. Added to these significant objections are the important groups such as the Cole Valley Regional Park, Iver Environment Centre and the Woodland Trust all note the damage this proposed development would have on the local area.

The application fails to draw on and take significant account of the Air Quality Action Plan (July 2021) that exists for this local area. The action plan notes "... priorities are in the short term to reduce emissions from HGVs (page 2)...". The action plan also notes "...the primary sources of air pollution are transport -related including the motorways (page 6)...". Further in the document it is noted "...that a 1% reduction in HGV movements on the M25 is likely to bring about a reduction approaching 5% in terms of total NO₂ road traffic emissions (page 7)...". Given the information and intent of the Air Quality Action Plan, The Ivers Parish Council is of the view that this proposed development would be inconsistent with paragraph 181 of the NPPF(2018). This paragraph states; "Planning policies and decisions should sustain and contribute toward compliance with relevant limits values or national objectives for pollutants, taking into account the presence of air quality map management areas and

clean air zones, and the cumulative impacts of individual sites in local areas. Planning decisions should ensure that any new development in air quality management areas and clean air zones is consistent with the local air quality action plan.” To restate our position The Ivers Parish Council objects to this application and seeks to have this application called in. The comments in this document and our previous comments still apply. The application fails to take account of material planning concerns and does not make a case for exceptional circumstances to release the greenbelt.

Letter Dated 17th August 2023

Additional Objection statement to PL/20/4332/OA (original and amended applications) Motorway Services Area at Land to The North Of A4007 Slough Road (Between Junctions 15 and 16 Of The M25) Iver Heath Buckinghamshire

The applicants’ document dated 21 June 2023 asserts that policy IV1 – Corridors of Significance, (The Ivers Neighbourhood Plan, adopted 2023), would not be breached by this development. The Parish Council disagrees with the narrow interpretation that the applicant has applied. We maintain that the development is not in keeping with the policy.

The Parish Council also notes that the applicant has had limited engagement with us. Indeed, the only engagement was an online meeting held on 26 November 2020, which was chaired by Cllr Martin Tett. This meeting clearly pre-dates the adoption of the Neighbourhood Plan.

This area of greenbelt is narrow and the MSA development will substantially reduce the greenbelt. In July 2023, we were advised that the National Grid intend to build a new substation in the same greenbelt corridor near the proposed motorway services area. This will have a further significant negative impact on biodiversity, we note the presence of the Great Crested Newts in the area and the loss of over 1600 mature trees from the MSA proposal. We understand that the Ivers Environment Centre has provided extensive evidence relating to the Great Crested Newts to Buckinghamshire Council in 2022.

The Air Quality in the Ivers parish area remains poor. Information provided to the Wexham and Ivers Community Board in August 2023 show that the annual 2022 figures for all sites remain well above the World Health Organisation guidance of 10ug/m³. Indeed the majority of monitoring sites exceed 30ug/m³. No PM_{2.5} monitoring is occurring – and this is heavily impacted by construction activities, road surface, vehicle brake dust and similar.

The Parish Council maintains its objection to this development.

If the Strategic Sites Committee determines to permit the development, The Parish Council has previously identified s106 mitigations that we believe are appropriate. In addition, we add: Funding for significant biodiversity projects be available and that these projects are to be determined by Colne Valley Regional Park and Ivers Parish Council. The Iver Education Centre be relocated to a suitable nearby site with all costs of redevelopment met by the developer and compensation for the loss of any revenue as a result of the relocation (this includes ongoing loss of grant revenue from National Grid).

The current site of the Iver Environment Centre is to be maintained as an appropriate biodiversity refuge area including the protection of the Great Crested Newts located in the area, this service to be fully and adequately funded in perpetuity.

Adjoining Authorities

London Borough of Hillingdon (dated 17th March 2021)

The London Borough of Hillingdon objects to the application which is an inappropriate development within a large area of Green Belt requiring very special circumstances to be robustly justified. The applicant has failed to provide evidence that there is a need for commercial development to the scale proposed. It is requested that further detail is provided on the need for the scale of scope of commercial development and traffic routing for the construction. Further information is required in relation to the minerals extraction work and the importation of inert material for site restoration. The London Borough of Hillingdon should be consulted on the additional information provided. Further details relating to construction traffic is also required.

It is recommended that a strategic approach is taken by Buckinghamshire Council and Hertfordshire County Council in consultation with the relevant authorities to identify the need for an MSA and allocate a suitable site through the local plan process.

Three Rivers District Council (dated 4th February 2021)

This Council has considered the above application and raises NO COMMENTS to the application subject to your authority ensuring that the proposal complies with all relevant policies contained in the adopted Development Plan and guidance contained within the National Planning Policy Framework.

Slough Borough Council (dated 15th February 2021)

Green Belt

The proposal appears to be inappropriate development in the Green Belt. It does not appear the proposal would benefit from Very Special Circumstances.

Air Quality

If you are considering permitting the development, it is recommended that Slough support a requirement for a Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP) by condition. No framework documents are provided for these plans with the outline application. We would recommend that Slough request construction routing in Stage 1 (prior to dedicated M25 construction access slip road) to access Strategic Road Network via M40 Junction 1, A412 Denham Road and Fiveways Roundabout and not from the south impacting on Air Quality Management Areas (AQMA) in Iver (Bucks Council) and Brands Hill (Slough, AQMA 2) and Slough town centre (AQMA4).

There is a limited study area to the operational phase assessment. Appendix 8.2 to Volume 2 of the Environmental Statement indicates that in the operational phase +372 Annual Average Daily Traffic (AADT) vehicle movements are projected on the A412 Uxbridge Road west of the Five Ways Roundabout and +149 AADT on Bangor Road S. The former route heads towards the Slough town centre AQMA, while the latter route is to/from the Iver AQMA and ultimately the Brands Hill AQMA. The number of additional average daily vehicles assigned to these road links indicates that the development will exceed the threshold of +100 AADT particularly in the Iver AQMA where a detailed air quality assessment should be made of the impacts. Air Quality levels in the Iver will be higher than in the immediate environs of the application site and vehicle speeds lower therefore small increases in traffic and vehicle exhaust emissions could have a more significant impact.

It is noted from the Framework Travel Plan that core shift patterns mean that shift changes (6am, 2pm and 10pm) for the majority of employees will fall outside of peak travel hours. About 100 full time equivalent staff will work either a cross shift 11am-6pm or management shift 9am-6pm. Given the location of the site access to the site is likely to be predominantly by private car, particularly given the unconstrained availability of parking at the site. The Framework Travel Plan includes potential measures of a car sharing scheme and a dedicated staff bus service to transport hubs such as local bus and rail stations. These are not committed measures and we would recommend that these be confirmed within a Detailed Travel Plan (secured by condition) and in the case of the staff shuttle bus secured within a S.106 agreement to ensure that impacts on the location transport network and air quality from the development are reasonably minimised. It is noted that in the non-technical summary and other documents the provision of the staff shuttle service appears committed in contrast to the unconfirmed status in the Framework Travel Plan, which is potentially misleading to members of the public and stakeholders, especially given the number of technical documents being consulted upon.

Consultation Responses

Buckinghamshire Fire & Rescue Service (x 2 responses dated 17.06.2022)

Further to the planning consultation amendment for the above development Buckinghamshire & Milton Keynes Fire Authority seek to request your early consideration for the incorporation of an appropriate automatic water suppression system (i.e., Sprinklers) within the planning conditions for the project.

Buckinghamshire & Milton Keynes Fire Authority firmly believes that automatic water suppression systems and in particular, sprinklers provide huge benefits to our communities.

The main purpose of fire sprinkler systems, which conform to the relevant standards, is to control and contain fires throughout a building. In so doing, they protect the premises from the effects of fire and contribute to the safe evacuation of persons from the premises. They significantly help to:

- Reduce death and injury from fire
- Reduce the risks to fire-fighters
- Protect property and heritage
- Reduce the effects of arson
- Reduce the environmental impact of fire
- Reduce fire costs and the disruption to the community and business
- Permit design freedoms and encourage innovative, inclusive and sustainable architecture

Design Freedoms

Architects are able to design more innovative, open, light and airy buildings. Please look at the following advantages: larger compartment sizes; more open spatial designs; extended travel distances; reduced exit door widths; reduced periods of fire resistance to elements of structure; reduced space separation constraints for example, distances between buildings; reduced design fire size allowing for alternative smoke management strategies; overcoming firefighting access constraints; allowing more flexible building management plans for the end-user.

Myth Busting

Each sprinkler head is fitted to cover a designated area of the property and designed to work independently, only releasing water if its thermal element is activated by the heat from a fire. The operation of one sprinkler head does not mean that all heads in the system will activate, this is a misconception that is popularly believed. Only very specific systems needing such operation are designed in this way and in virtually all internal sprinkler systems, only the head actuated will release any water.

A further protection from unwanted operation is the thermal capacity of the sprinkler bulb. Generally, these are designed to operate at a fixed temperature not less than 30 degrees Celsius above the ambient temperature which makes it very unlikely indeed that operation will occur other than in fire conditions. Recent surveys indicate that the possibility of an accidental sprinkler head operation due to malfunction of the system is 1 in 16 million.

Once a sprinkler head has operated, it will typically discharge between 40-45 litres of water a minute to control the fire. This represents between 1 and 4% of the amount of water that would be used by the fire service to control a similar sized fire. So the sprinkler will reduce water damage and the consequent repair costs.

In Summary

The nature of protection provided by a sprinkler system can be summarised as follows:

- It is automatic
- It detects fire in the early stage of development and will operate before the fire or the products of combustion become life threatening;
- The system will operate when a fire raises the temperature to a predetermined level and will sound an alarm both internally and externally as well as indicating the fire location
- Water will be discharged at a predetermined rate over the affected area only

- Water from the activated sprinkler will cool the atmosphere around the fire including the hot gases released from the flaming area
- Directly reduce the rate of burning of the ignited material
- Directly reduce the production of smoke and hot gases
- Cool the surrounding materials limiting fire spread

Research illustrates that the vast majority of fires controlled by a sprinkler system have involved just one sprinkler head activating.

Sprinklers are installed to BS EN 12845:2003 for non-residential premises.

In the United Kingdom, no one has died in a fire where properly maintained fire sprinkler system has been installed.

The vision of the Authority is to make Buckinghamshire and Milton Keynes the safest areas in England in which to live, work and travel. One of our core strategic objectives includes protecting the public, the buildings, and businesses from the effects of fire.

Further to your recent consultation relating to the subject development, this Authority's comments are as follows:

1. A suitable and sufficient subsidiary emergency vehicle access via Slough Road to the MSA will be maintained as described within the proposal
2. The application must give due consideration to Approved Document B, Section 15 (Vehicle Access) and Section 16 (Fire Mains & Hydrants)
3. The Authority encourages the early consideration for the inclusion of automatic water suppression (i.e., Sprinklers) into both the design of the MSA, Hotel and ancillary accommodation
4. Particular attention must be given to parking facilities to prevent chronic parking issues, which could ultimately affect the attendance of the emergency services
5. Where a gated access is included within the application it is preferable that a digital lock is fitted, it is then the responsibility of the property owner to inform Buckinghamshire Fire & Rescue Service of the access codes and update these details should there be any changes

Further comment will be made during any pre-consultation and full plans submissions via the BCB. The Authority reminds the Client & BCB to follow the Building Regulations and Fire Safety Procedural Guidance, July 2020 when engaging in the consultation process

Environment Agency (Response dated 1st July 2022)

Thank you for consulting us on the amended application. We have reviewed the new information and are now able to remove our objection if the following conditions are applied to the grant of any planning permission. Without these conditions the application would pose a risk to the environment, and we would wish to object.

Condition 1

No development shall take place until detailed designs for the structures impacting the River Alderbourne and its riparian zone have been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The scheme shall include:

- Detailed cross sections and planform drawings of the River Alderbourne through the newly created underbridges.
- Detailed cross sections and planform drawings of the newly de-culverted section of the River Alderbourne and watercourse enhancements.
- Detailed designs of the riparian zone and wetland areas including the newly created Aquatic Habitat Creation Area and Flood Compensation Area
- Details of embedded mitigation in line with CIRIA best practice; such as lowered invert levels to provide a minimum 200mm depth naturalised river substrate, mammal ledges, and inclusion of habitat niches.
- Details of how newly created underbridges will tie-in with the proposed open sections of watercourse.
- Details of how the underbridges will be managed and maintained for the lifetime of the development.
- Assessment of the lighting availability to the river as a result of the new structures (considering both increased lighting and increased shading) and consideration of how this will impact on habitat connectivity and establishment, sediment transport and species migration.

Reasons

New and modified structures over watercourses can pose a significant risk to the Water Framework Directive (WFD) status of a watercourse; this proposal on the River Alderbourne has been assessed at the outline stage, but detailed designs are required to fully assess the impact. The creation of the new underbridges, and extended underbridge adjacent to the M25 must be designed in line with best practice guidance and include embedded mitigation to offset potential WFD impacts.

This approach is supported by paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

Condition 2

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas, shall be submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements:

- Details of maintenance regimes.
- Details of any new habitat created on site including planting schemes for native species.
- Details of treatment of site boundaries and/or buffers around water bodies.
- Details of management responsibilities.
- Details of how biodiversity net gain is to be delivered on site.
- Management plan for the treatment of any invasive species on site
- Details of the accessibility of the site for the ongoing WFD monitoring by the Environment Agency. A 100m stretch of river is required for the macrophyte survey, current upstream point at TQ0417283573.

Reason

To ensure the protection of wildlife and supporting habitat. To secure opportunities for enhancing the site's nature conservation value in line with national and local planning policy, and to ensure there is continuous monitoring of the Alderbourne WFD status. The management plans should be informed by up-to-date ecological surveys including any required species mitigation.

Advice on Condition 2 - Landscape and ecological management plan

This condition has been requested as there are several elements to the development that require more information, these include:

- Ecological enhancements that have been proposed will require a management plan to be in place. This will ensure the landscape provides a maximum benefit to people and the environment.
- Delivery of biodiversity net gain through the proposed development, this should be quantified through a calculation such as the Biodiversity Metric 3.0 and approved in writing by the Local Planning Authority.

The Thames River basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote their recovery. Without a landscape management plan, the proposal's ecological impact may prevent a water body quality element from attaining good ecological status in the Alderbourne. This is because it could lead to the spread of invasive non-native species, and the watercourse may provide a pathway for pollutants.

Condition 3 – Deculverting detailed design

No development shall take place until detailed designs of the deculverted and enhanced sections of the River Alderbourne has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency. Thereafter, the development shall be carried out with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority in consultation with the Environment Agency, in which case the development shall be carried out in accordance with the amended scheme. The scheme shall include:

- Detailed cross sections and planform drawings of the opened sections of the River Alderbourne.
- Details of biodiversity enhancement; such as a minimum 200mm depth naturalised river gravel substrate, in-channel enhancement to improve the hydromorphology, and inclusion of habitat niches.

- Details of the naturalised banks and riparian buffer zone, to include; 'soft' engineering options, details of any new habitat created on site including planting schemes for native species and details of treatment of site boundaries and/or buffers around water bodies. •
- Details of maintenance regimes and management plans.
- A Biodiversity Net Gain calculation of the whole development site to ensure a minimum 10% net gain for the river metric.
- Details of how the deculverted sections will tie-in with the newly created underbridge sections of the River Alderbourne through the development.
- Details of surface water drainage and SUDs schemes impacting the river, including detailed designs of any proposed outfalls.

Reason

The proposed deculverted sections of the River Lea has been adequately assessed at the outline stage, but detailed designs are required to fully assess the impact. The river must be designed in line with best practice guidance and include embedded mitigation to offset potential Water Framework impacts, and to maximise biodiversity net gain.

This approach is supported by paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity.

Advice on Condition 3

The proposed development includes a plan to deculvert at least 69 linear metres of the Alderbourne to the South of A4007 Slough Road. Detailed designs of the proposed 'daylighted' watercourse are required to ensure that the development is compliant with the Water Framework Directive and the Thames River Basin Managements plan, and maximises opportunities for biodiversity gain.

Condition 4

No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons

To protect groundwater. The site is located on a principal aquifer and is proposing a large fuel filling area. This condition will ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by, unacceptable levels of water pollution in line with paragraph 183 of the National Planning Policy Framework.

Advice on condition 4

We note from the application documents that the fuel filling areas will include 25 fill points for cars, HGVs and light vehicles, however there is no further details about the fuel fillings areas and associated tank farms.

The Phase 1 Geo-environmental reports and Hydrogeological Technical Notes both recommend further site investigation and groundwater monitoring for a least 12 months to establish the groundwater elevations, flow directions and seasonal variations.

As part of this condition, we will require a satisfactory risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed. Specifically a hydrogeological risk assessment which considers the following;

1. all previous uses and proposed fuel filling and storage activities along with the potential contaminants associated with those uses,
2. A conceptual site model of the site indicating sources, pathways (including surface and foul drainage systems and foundations) and receptors potentially unacceptable risks arising from contamination at the site
3. Changes to the seasonal groundwater variations and of flows due to the proposed associated mineral extractions and subsurface obstructions.
4. The total volume of fuels stored and their composition.
5. The fuel filling points and tank farms which include the full structural details e.g. number of tanks and capacity, tank surrounds, associated pipework and monitoring system.

Condition 5

Prior to any part of the permitted development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 183 of the National Planning Policy Framework.

Condition 6

The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the local planning authority, has been submitted to, and approved in writing by, the local planning authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the local planning authority.

Reason

To ensure that the site does not pose any further risk to human health or the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 183 of the National Planning Policy Framework.

Condition 7

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 183 of the National Planning Policy Framework.

Condition 8

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 183 of the National Planning Policy Framework.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference

number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Buckinghamshire Council Ecology (dated 27th October 2022)

Summary:

No objection subject to conditions.

A holding objection was made to this application in August 2022 due to insufficient information provided on great crested newts (GCN).

The matters that remained to be satisfactorily addressed for the CVS application included:

- Assessment of presence/absence of great crested newt and potential impacts;

The further GCN information required was:

- Proof of entry into Buckinghamshire Council's District Licence Scheme – via provision of a NatureSpace Report or Certificate; or
- European Protected Species Mitigation (EPSM) Licensing for GCN.

Background

The applicant submitted a Position Statement (22nd July 2022) to address a number of concerns in relation to Ecology that were raised in a previous response. The Position Statement satisfactorily addressed the following matters:

Assessment of impacts on roosting bats in structures e.g. culverts potentially directly or indirectly impacted by construction activities;

Assessment of impacts for bats, reptiles and badger;

Evidence that habitat condition assessments have been undertaken in accordance with DEFRA Metric V3.0. However, the objection was upheld in August 2022 due to insufficient information being provided within the Position Statement on GCN. The objection letter set out the different options available to the applicant, including undertaking their own population estimate surveys to inform an EPS licence application or by using the Buckinghamshire District Licence Scheme.

Additional information

The applicant has subsequently provided information to confirm that they have progressed with the District Licence Scheme and has provided a District Licence Report (Nature Space Partnership, October 2022).

The report provides details of the assessment undertaken by NatureSpace Partnership on 17th October 2022 to confirm that district licencing is an appropriate route for the proposal.

It confirms that the assessment followed the agreed processes and protocols as set out in the District (organisational) Licence granted to Buckinghamshire Council (WML-OR112).

This provides sufficient information to overcome the previous reason for upholding the objection, including the need for additional surveys (which are not a requirement of District Licencing).

The report provides the wording to be attached to any granted permission as a condition and this is provided in the following section, a long with other condition wording required for the proposal.

Conditions

There are no further objections to this application on ecology grounds, subject to the following conditions:

1. No development hereby permitted shall take place except in accordance with the terms and conditions of the Council's organisational licence (WML-OR112) and with the proposals detailed on plan "Proposed Colne Valley Services (CVS) Site: Impact Plan for great crested newt District Licencing (Version 1)", dated 12th September 2022.

Reason: In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the organisational licence WMLOR112.

2. No development hereby permitted shall take place unless and until a certificate from the Delivery Partner (as set out in the District Licence WML-OR112), confirming that all necessary measures in regard to great crested newt compensation have been appropriately dealt with, has been submitted to and approved by the local planning authority and the local authority has provided authorisation for the development to proceed under the district newt licence.

The Delivery Partner certificate must be submitted to this planning authority for approval prior to the commencement of the development hereby approved.

Reason: In order to adequately compensate for negative impacts to great crested newts.

3. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.

- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

4. A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

5. Prior to occupation, a “lighting design strategy for biodiversity” shall be submitted to and

approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for nocturnal species using the site, specifically bats, and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

6. The development shall be implemented in accordance with the agreed mitigation, compensation and enhancement measures, as described in Chapter 6; Ecology and Nature Conservation, of the Environmental Statement Regulation 25 Update – Volume 5 (May 2022). Any variation to the agreed plan shall be agreed in writing with the local planning authority before such change is made. The condition will be considered discharged following; a written statement from the ecologist acting for the developer testifying to the measures having been implemented correctly.

Buckinghamshire Council Minerals & Waste (dated 3rd August 2022)

Summary:

Policy 1 of the Buckinghamshire Minerals and Waste Local Plan (BMWLP) sets out the Mineral Safeguarding policy stance for the county. Proposals for development within Mineral Safeguarding Areas (MSAs) other than which constitutes exempt development, must demonstrate that:

- prior extraction of the mineral resource is practicable and environmentally feasible and does not harm the viability of the proposed development; or
- the mineral concerned is not of any value or potential value; or - the proposed development is of a temporary nature and can be completed with the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
- there is an overriding need for the development.

The policy also requires the submission of a Mineral Assessment detailing a number of matters.

Discussion:

Policy 1 of the BMWLP in summary seeks to prevent needless sterilisation of mineral resources of local and national importance by non-minerals development.

With respect to the criteria listed in Policy 1, the applicant has submitted planning application ref: CM/0036/21 which seeks to secure planning permission to extract mineral underlying the proposed MSA development on the western side of the M25 amongst other matters. Effectively, in the area to the west of the M25 where development would likely sterilise mineral resources the applicant seeks to evidence that prior extraction of the mineral resource is practicable, environmentally feasible and does not harm the viability of the proposed development.

Application ref: PL/20/4332/OA is supported by a mineral assessment (Updated Mineral Assessment, Version 4, dated July 2022, prepared by Land & Mineral Management) which utilises site specific geological survey data to establish the existence or otherwise of a

mineral resource (detailing resource type, quality, estimated quantity and overburden to reserve ratio). The assessment also provides commentary on whether prior extraction is feasible for identified mineral resources.

Western Area

In consideration of the detail submitted, the applicant has sufficiently demonstrated that the proposed method of extraction would result in the majority of the workable resource to the west of the M25 being extracted with limited resources being omitted and thus sterilised by built non-minerals development proposed.

Eastern Area

With regards to the area to the east of the M25, the applicant is not seeking to extract the mineral underlying the development. Instead for this area the applicant is seeking to demonstrate the mineral concerned is not of any value or potential value (though there is some commentary as to how prior extraction may make the delivery of the MSA development as a whole unviable / would cause lengthy delays to construction). Within the eastern land no site investigation work was carried out as initial evaluation of the area by the applicant concluded that the extraction of any underlying mineral would be uneconomical and environmentally unviable.

The two historic British Geological Society (BGS) Boreholes within the eastern area were used by the applicant to estimate the potential deposit size. The applicant also notes that BGS boreholes used to estimate the reserve in the western area provided estimates of mineral reserves circa three times that which site investigations concluded. This discrepancy is argued to be relevant to the calculated reserve size in the eastern area.

Concerning the quality of the resource, the applicant notes that due to the reserve lying upon alluvium that there was a high likelihood that there is a high clay and silt content. Further, reference to the boreholes conducted in the western area having high silt/fines content is made which may indicate the resource lying upon alluvium may have a commercially unworkable level of silt/fines content.

Further to this, the applicant sets out a number of complications which would face a mineral extraction operation in the eastern area. These include the difficulties presented to mineral extraction in the eastern area by virtue of: the presence of the River Alder Bourne, potentially high groundwater levels, securing adequate standoffs to veteran trees, the situation of the eastern land within Flood Zone 3 and access.

In sum these arguments look to weigh against the viability of the extraction of these resources. The applicant considers that the constraints on the eastern land are too extensive for the mineral reserve to be viable to extract. Following the construction of buffer zones and standoffs the extractable area to the east of the M25 is calculated to be circa 1.77ha with an extractable resource of roughly 100,000 tonnes (without reduction via the arguments made over BGS borehole accuracy in the surrounding area).

Finally, it is stated that the works proposed under application ref: PL/20/4332/OA do not include extraction within the eastern area and the applicant makes the following argument:

“if it were prior extracted, in the limited areas identified as potentially unconstrained to do so, then importation of the same volume of material that had very similar characteristics to the material extracted would have to be sourced to infill the void created and reinstate ground levels. It is critical that the formation layer for the highway infrastructure is stable and the likelihood is that these materials would be similar quarried aggregates, making prior extraction to prevent sterilisation a meaningless exercise.”

In view of the above, it is hence argued by the applicant that the safeguarded mineral resource underlying the development to the east of the M25 is not viable to extract, is not practical to extract nor environmentally feasible.

Revisiting policy 1 of the BMWLP, regarding the eastern area, the applicant is considered to adequately demonstrate that the mineral underlying the site is not of any value or potential value and therefore satisfied the requirements of policy 1.

Suggested Condition:

Prior to the commencement of development a mineral recovery plan for the management of sand and gravel resource recovered incidentally from excavation work throughout the construction phase of the development shall be submitted to and approved in writing by the Local Planning Authority. The mineral recovery plan shall include details of methods for ensuring that all viable minerals excavated during the construction phase are put to beneficial use on site as part of the development. A method to record the recovery of minerals shall also be included within the plan. Records of the amount of recovered material shall be made available to the Local Planning Authority. The development must accord with these approved details.

National Air Traffic Safeguarding (dated 26 July 2022)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en-route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Heathrow Airport Limited (dated 26th July 2022)

I refer to an email received from you, dated Monday 22 July 2022. Following submission of additional information the development has been examined from an aerodrome safeguarding perspective and we maintain our previous position that it could conflict with safeguarding criteria unless any planning permission granted is subject to the conditions detailed below.

1. Height Limitation on Buildings and Structures

No building or structure of the development hereby permitted shall exceed 138m Above Ordnance Datum (AOD).

Reason

Development exceeding this height could have the potential to impact the Instrument Flight Procedures (IFP's) surrounding Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.

2. Submission of a Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

-management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards' (available at http://www.aoa.org.uk/wp_content/uploads/2016/09/Advice-Note-3-Wildlife-Hazards-2016.pdf).

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason

It is necessary to manage the development in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

Information

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airport Ltd Airside Operations staff. In some instances, it may be necessary to contact Heathrow Airport Ltd Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof. The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also like to make the following observations:

1. Wind Turbines

Wind Turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 5, 'Renewable Energy' (available at http://www.aoa.org.uk/wp_content/uploads/2016/09/Advice-Note-5-Renewable-Energy-2016.pdf).

2. Construction Aviation Warning Lights Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or Radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Denham (Bickerton's) Aerodrome dated 19th January 2021

I refer to your letters of 13 and 18 January 2021 to Denham Airport inviting comments on the above planning application. The Aerodrome Manager has asked me to send this reply on behalf of Bickerton's Aerodromes Limited.

Denham Airport has no objection to this application, on site C of those examined in the Alternative Sites Assessment. Although close to the southern edge of Denham Airport's Air Traffic Zone (ATZ) this site is not adjacent to the ATZ (unlike site A).

I note that your pre-application advice to the applicant, dated 9 October 2020, recommended the applicant to give consideration to the safeguarding of Denham Airport and suggested engagement with the Airport owners.

The applicant has not given consideration to aerodrome safeguarding. However, I can confirm that this proposed development, as described in the application, would not adversely affect the operations or safety of the busy Denham Airport.

The applicant did not approach the Airport, however on behalf of the Airport I contacted the applicant prior to submission of the application to understand more about the application and the timing of its submission.

Denham Airport understands that there is a need for a new Motorway Service Area on the M25 motorway, which indicates that one of the three sites being promoted, the third being that within the Three Rivers Council area, will be brought forward

Within Buckinghamshire, the Airport has raised strong objection to application PL/19/2260/OA which is very close to the Airport, well within its ATZ, beneath the flying circuits and which would have a significant adverse impact on airport operations and aviation safety. Denham Airport is a key transport and connectivity infrastructure hub as well as an important employment centre.

The Alternative Sites Analysis submitted in connection with application PL/19/2260/OA is flawed as it failed to consider the impact of development of a site between Junctions 16 and 17 on Denham Airport. Supplementary information submitted on behalf of the applicant, Extra, has not properly or adequately addressed the aviation safety issues.

Aviation safety is a material planning consideration and the need to protect General Aviation Aerodromes is set out in Government policy, including NPPF paragraph 104(f) as well as in Civil Aviation Authority (CAA) policies including CAP168 and CAP738.

Therefore, taking account of the need for a new facility to serve the M25, the site to the north of the A4007, at Iver Heath, Application PL/20/4332/OA, is significantly preferable in respect of airport safeguarding and aviation safety to the site between Junctions 16 and 17 of the M25, near Chalfont St Peter, Application PL/19/2260/OA.

Ministry of Defence – RAF Northolt Safeguarding (dated 21st September 2022)

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This is an outline application, with all matters reserved, for a motorway service station between Junctions 15 and 16 on the M25. Indicative plans submitted in support of the application portray a facility building with a maximum height of approximately 14.3m above ground level, a drive thru building and fuelling station with no indicative height, and landscaping that includes biodiversity planting and waterbodies. The application site occupies the statutory safeguarding zones surrounding RAF Northolt. In particular, the aerodrome height, technical and birdstrike safeguarding zones surrounding the aerodrome and is approx. 6.3km from the centre of the airfield at RAF Northolt.

Aerodrome Height

The proposed development site occupies the statutory height and technical safeguarding zones that ensure air traffic approaches, and the line of sight of navigational aids and transmitters/receivers are not impeded.

There are no aerodrome height safeguarding objections with the proposals.

Birdstrike

Within this zone, the principal concern of the MOD is the creation of an environment that may attract and support populations of large and/or flocking birds hazardous to aviation safety close to an aerodrome. The development shown on the submitted plans includes a number of elements that might result in the creation of such an attractant environment.

The buildings/structures contain design elements such as green roofs, small ledges, and crannies, which might provide nesting and roosting habitat for feral pigeons, large gulls, and starlings. These species are of particular concern for aviation safety. It is recommended that any subsequent reserved matters application is prepared to minimise the provision of these habitats.

The submitted plans show four basins that form part of a drainage/attenuations system. The provision of open water may attract waterfowl and/or gull species of concern to aviation safety. Whilst the proximity of the site to the Colne Valley and existing waterbodies is acknowledged, any final design submitted at reserved matters stage should seek to minimise the potential for these features to provide an attractant to hazardous species. This may be achieved through basins designed to drain to dry soon after storm events and/or the use of barriers and planting to discourage access for wildfowl to any open water that is provided.

The management of the site is also a concern, given the nature of the development proposed it will be necessary to ensure that measures are taken to minimise feeding opportunities for birds. Necessary measures are likely to include lidded bins and regular cleaning/litter picking. Measures/signage to discourage customers from feeding birds should also be incorporated.

In addition to those measures listed above, a robust results-based Bird Hazard Management Plan (BHMP) should also be provided. The BHMP should identify bird species likely to be problematic, the number of birds that would be considered a concern, measures that would be taken to address the hazard, measures to monitor bird numbers, and to measure the efficacy/result of bird control measures. The BHMP should also set out failure criteria and procedures to review and amend bird control measures to ensure they are effective.

The MOD has no objection in principle to the development proposed.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled 'Amended Landscape Masterplan', 'Amended Illustrative Masterplan 1 and 2' and 'Amended Design and Access Statement' dated June 2021. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

Buckinghamshire Council Heritage & Conservation Officer (dated 25th July 2022)

Summary:

As the NPPF states, heritage assets are an irreplaceable resource and it is important to conserve them in a manner appropriate to their significance. Given that the proposal would result in harm to the significance of a number of heritage assets, due to the permanent the permanently severing of the historic associations between the heritage assets, further erode of their agricultural setting, adding to the cumulative effect of modern development within their setting and noise and light pollution, there is felt to be insufficient justification for this harm to the significance of these heritage assets. Any harm to, or loss of, the significance of a heritage asset (from its alteration or destruction, or from development within its setting), requires clear and convincing justification. As such the proposals fail to comply with s.16 and 66 of the P(LB&CA)A 1990, heritage policy of the South Bucks Local Plan and South Bucks Core Strategy and heritage advice in section 16 of the NPPF.

Heritage Assets

Mansfield Farmhouse – Grade II listed building (80m east) Barn to north-east of Mansfield Farmhouse - Grade II listed building (70m east) Dovecote to east of Mansfield Farmhouse - Grade II listed building (120m east) White Cottage - Grade II listed building (adjacent to east)
Barn to north-east of Southlands Manor - Grade II listed building (690m north)

The above are designated heritage assets

Mansfield Lodge – Non-designated heritage asset (adjacent to south)

Discussion/Issues

This is my second consultation response and follows on from the submission of a rebuttal in the form of a Heritage Statement in response to my first comments.

There are four Grade II Listed Buildings - Mansfield Farmhouse, Barn to north-east of Mansfield Farmhouse, Dovecote to east of Mansfield Farmhouse and White Cottage, and a non-designated heritage asset - Mansfield Lodge, which lie within close proximity to the proposed site.

These buildings were constructed as part of the post-medieval Mansfield estate. The Mansfield estate is of medieval origin and was an agricultural use; it is recorded on the tithe map and apportionment. The setting of these buildings relates both to their historical relationship, and their historic setting of a rural agricultural environment.

Whilst their setting has been much altered in recent times through the construction of the M25 and other modern developments the proposed development would further truncate these assets by constructing on land between them. This would further erode and destroy the historical associations of these heritage assets, leaving this only to survive in archive records.

The submitted Heritage Statement argues that there would be no truncation of the setting or relationships between the buildings in the farm grouping. I must point out whilst the proposed development would not impinge on the architectural characteristics of the heritage assets, it would be a large modern development which would make it difficult to appreciate the buildings in their historic setting and understand their historic relationship. As such this would be another modern development in an already altered landscape which would further remove physical links between the buildings and would result in the loss of the relationship between the buildings and agricultural land. Therefore, this development proposal would lead to further truncation of the heritage assets.

The Heritage Statement does concur with my assessment that the proposed development would have a harmful effect on the agricultural setting including historic association with the agricultural land. The Statement also concurs that noise, light pollution would be an inherent part of the development proposal. No comment is made on the issue of increased traffic movement. I remain firmly of the view that the harmful cumulative effects of the modern development would have a significant impact on the setting of the heritage assets.

Regarding White Cottage, Mansfield Farmhouse, the Barn, Dovecot and White Cottage and the NDHA Mansfield Lodge are a group of buildings historically related by the post-medieval Mansfield estate. The proposed development would wrap around to the west, east and north of White Cottage and would include proposals to plant woodland in the field immediately to the north which is currently open agricultural land. Modern development of the scale proposed and the need for significant planting would further make it difficult to appreciate the buildings in their historic rural setting and the building would no longer be readily associated with agricultural land.

Therefore, I maintain my view that this harm would constitute less than substantial harm in relation to the policy test required as part of the NPPF. However, I consider that the relative sensitive of the wider settings of the Listed Buildings and non-designated building historically associated with Mansfield Farm is medium given the proximity of the development and that the proposed development would constitute a medium magnitude of change and the resulting levels of effect would be Moderate adverse change. The term 'moderate adverse change' means that the proposed development would be a negative element within the setting that would erode the significance to a discernible extent.

My assessment is based on the fact that the proposed development would be permanently severing the historic associations of these heritage assets, further erode their agricultural setting, add significantly to the cumulative effect of modern development within their setting, and add to noise and light pollution. As such I consider that would be a negative element within the setting that would erode the significance of the historic assets to a clearly discernible extent.

Para 199 of the NPPF confirms that great weight should be given to the asset's conservation and Para 200 requires that any harm to the significance of a designated heritage asset (from its alteration or development within its setting) should require clear and convincing justification.

The development proposed is considered to cause less than substantial harm to the designated heritage assets. In such circumstances, Para 202 of the NPPF states that this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. As such it is entirely up to the Planning Officer to weigh up the less than substantial harm to the significance of the heritage assets, against the public benefits of the proposal.

Heritage Policy Assessment

The Planning (Listed Building and Conservation Areas) Act 1990

The proposals due to the permanently severing of the historic associations between the heritage assets, further erode of their agricultural setting, adding to the cumulative effect of modern development within their setting and noise and light pollution would not preserve the architectural and/or historic interest of the listed building and therefore does not comply with sections 16/66 of the Act.

NPPF

The proposal due to the permanently severing of the historic associations between the heritage assets, further erode of their agricultural setting, adding to the cumulative effect of modern development within their setting and noise and light pollution would cause less than substantial harm to the significance of the designated heritage asset. Paragraph 202 therefore applies. Paragraph 189/197/199 of the NPPF should also be considered in determining the application.

Conclusion

For the reasons given above it is felt that in heritage terms:

That the application does not comply with the relevant heritage policy and therefore unless there are sufficient planning reasons, it should be refused for this reason.

Buckinghamshire Council Heritage & Conservation Officer (dated 30th August 2023)

Summary:

Heritage assets are an irreplaceable resource, and it is important to preserve them in a manner appropriate to their significance. In heritage terms, Less than substantial harm has been identified to the assets detailed in the discussion below. Any harm or loss of significance to a heritage asset requires clear and convincing justification and should be weighed against public benefits.

Heritage Assets:

Mansfield Farmhouse – Grade II listed building (80m east)
Barn to north-east of Mansfield Farmhouse - Grade II listed building (70m east)
Dovecote to east of Mansfield Farmhouse - Grade II listed building (120m east)
White Cottage - Grade II listed building (adjacent to east)
Barn to north-east of Southlands Manor - Grade II listed building (690m north)
The above are designated heritage assets

Mansfield Lodge – Non-designated heritage asset (adjacent to south)

Discussion:

Consultation responses have been provided by another case officer in relations to these proposals. The purpose of these comments is to clarify the levels of harm in heritage terms to enable the appropriate weight to be given to heritage matters in the Planning assessment.

The previous Heritage Officer (Consultant) has identified Less than substantial harm to the significance of the GII listed buildings at Mansfield Farmhouse, Barn to the NE of Mansfield FH, Dovecote to East of Mansfield FH and White cottage due to the proposed changes within their setting. The landscape and setting changes are discussed in the previous comments using Landscape terminologies. I would expect that the assessment of 'Moderate adverse change' was identified through discussion with the Councils Landscape Team by the Heritage Consultant. In order to provide clarification, I have reviewed the proposals against the existing situation and would confirm that in heritage terms I would assess the harm in heritage terms as low level LTSH.

The following are factors in this review:

The existing separation and severing of visual links and shared setting due to the M25, Slough Rd substation and existing green screening.
The temporary nature of construction and excavation stages of the proposal.
The sunken nature of the proposed MSA and vegetation renewal proposed.
The orientation of the farm buildings away from the proposed new slip road.

Heritage Policy Assessment

The Planning (Listed Building and Conservation Areas) Act 1990

The proposals due to the further erosion of their agricultural setting and adding to the cumulative effect of modern development within their setting through noise and light pollution would not preserve the architectural and/or historic interest of the listed building and therefore does not comply with section 66 of the Act. NPPF The proposal due to the further erosion of their agricultural setting and adding to the cumulative effect of modern development within their setting through noise and light pollution would cause less than substantial harm to the significance of the designated heritage asset. Paragraph 202

therefore applies; in applying this policy it is considered that the following paragraphs also apply:

Paragraph 189 – Heritage assets are an irreplaceable resource and should be preserved in a manner appropriate to their significance.

Paragraph 195 - planning authorities should assess the particular significance of any asset affected by a proposal, including by development within its setting and aim to avoid or minimise any conflict between the asset's conservation and any aspects of the proposal.

Paragraph 197 – Assessment should take account of the desirability of sustaining and enhancing the significance of heritage assets and should provide a positive contribution to local character and distinctiveness.

Paragraph 199 - great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. This is irrespective of whether the harm amounts to substantial, or less than substantial harm.

Paragraph 200 – Any harm or loss of significance of a designated heritage assets from its alteration or destruction, or from development within its setting should require clear and convincing justification. The Case Officer should ensure that this is considered within their final assessments. The NPPF paragraph 206 - Local planning authorities should look for opportunities for new development within Conservation Areas... and within the setting of heritage assets, to enhance or better reveal their significance. As noted above pre-existing development has already undermined the relationships between White Cottage and the related Mansfield FM assets.

Conclusion

For the reasons given above it is felt that in heritage terms:

That the application does not comply with the relevant heritage policy and therefore the harm should be weighed in the Planning Balance against public benefit.

Historic England (dated 7th June 2022)

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request

Buckinghamshire Council – Strategic Access Officer (dated 8th July 2022)

Please read these comments in conjunction with my earlier comments loaded on the planning portal 15 APR 2021.

A4007 Slough Road [A4007 cycling improvements]

The proposed 3m wide footway/cycleway connecting along the south side of Slough Road from the new vehicular access in an easterly direction towards Uxbridge, is welcome as it complements the cycling and walking network provided along Bridleway IVE/32/1 through the site and Bridleway IVE/33/2 south of the A4007 Slough Road. The proposed controlled Toucan crossing will facilitate walkers and cyclists crossing this road in the vicinity of the proposed new vehicular access and provide a more connected rights of way network between Iver and Pinewood.

Slough Road [A4007] controlled crossing

With the above in mind, Highways Development Management's Condition 5 recommends pre-commencement submission of plans for a Toucan crossing of Slough Road for walkers and cyclists, with construction pre-occupation via s278 Highways Act 1980 agreement

However, mindful of the British Horse Society's comments [MRS PETRONELLA NATTRASS 12 FEB 2021] confirming Bridleway IVE/32/1 through the site is currently used by horse riders with stables and yards situated south of the A4007, wishing to make onward connections to Sevenhills Road and Black Park in the existing situation, it would be helpful to include some equestrian provision on the Toucan crossing.

This would facilitate horse riders making the connection along the vehicular highway network [blue] between existing bridleways [green] on Extract 1.

Canal & River Trust

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The main issue for the Trust on this application is the connectivity to, and impact on the canal corridor, from increased use as part of the Sustainable Transport Network. The Trust has reviewed the amended information available, and our advice remains that a legal agreement is necessary to address this matter. Our advice and comments are detailed below:

The revised Transport Assessment still indicates a commitment to providing sustainable travel options for staff with the main pedestrian/cycle access for staff to be provided via Slough Road with mitigation measures including the provision of a 3m path and new signalised crossing. The Technical note at Appendix O highlights cycle catchments and links to NCN route 6 & 61. There is however no assessment of the potential of the canal towpath

to form part of the sustainable transport network, nor any mitigation measures to address the increased use of the towpath that will arise from the proposed development.

The amendments have therefore not addressed our previous comments, dated, 11th August 2021, which are still relevant, and for convenience are copied in full below:

The Grand Union Canal is located to the east of the application site and the Slough Arm of the Grand Union Canal is to the south. Although not in the immediate vicinity of the site the towpath to both of these sections of the canal network are accessible, either on foot or by bicycle, from the development and they open up opportunities for active travel. The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers and could provide linkages / access to the urban areas and local facilities such as underground stations.

The Design & Access Statement (p69) identifies the existing cycle infrastructure in the surrounding area though it appears to suggest that National Cycle Network (NCN) Route 6 “provides a direct cycle connection between Uxbridge underground station and the site.” However, this is not the case, NCN6 runs along the Grand Union Canal towpath from Iver Lane, north and parallel to the M25. NCN Route 61 connects to the southern end of NCN Route 6 at Iver Lane and runs east-west south of the site, whilst it also does not connect directly to the site it does link to the Slough Arm of the Grand Union Canal. The canal would provide an attractive off-road pedestrian/cycle route for access to the site from the wider area avoiding heavily trafficked routes, such as the A4007, which would not provide for particularly inviting routes for pedestrians and cyclists, especially less experienced riders.

Considering the size of the proposed development there would likely be increased emissions impacts from the staff travelling to work, alongside the deliveries by HGVs. Within the Framework Travel Plan, there is some reference to the provision of a new footway and crossing from the existing bus stop, provision of cycle parking, and a staff bus, though other measures to encourage staff to travel to the site on foot or by bike appear limited, and there is no mention about supporting local sustainable transport development. There are undeniable impacts of the scheme on the local landscape and environment, and given its intrinsic purpose to support road traffic, it seems appropriate that mitigation is provided in the form of supporting the provision of suitable sustainable transport infrastructure in the local and wider area, including to support routes to the site itself.

The canal towpath between Slough and Yiewsley and Uxbridge provides an opportunity to provide convenient, safe, attractive and traffic-free routes for cycling and walking to support sustainable and active travel more widely in the local area. The Trust generally seeks to maintain its assets in a “steady state”, and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage the Trust’s maintenance liabilities will also increase, and we consider that it is reasonable to request a financial contribution from developers to either cover increased maintenance costs, or to upgrade access points and the towpath surface to a standard which are more durable and thus able to accommodate increased usage, and during a greater range of weather conditions across the year, without adding to the Trust’s future maintenance costs.

In this case we would suggest this could include towpath improvements from Rockingham Road north (also assisting staff wanting to cycle from northern parts of Uxbridge), between Cowley Mill Road south (also supporting staff travelling from southern parts of Uxbridge and Yiewsley), and also on the Slough Arm, providing a route in from Slough, and Langley.

In light of the support offered by Policies CP6 & CP7 of the Core Strategy, 2011 and the approach to developer contributions guidance contained within the Community Infrastructure Levy Regulations 2010 (CIL), we consider that a case can be made that such a contribution is necessary, directly related to the proposed development and is fairly and reasonably related in scale and kind to the development proposed, as the towpath would be a key cycle and pedestrian route for utility use to promote health and well-being and overall sustainability of the proposed development site and can therefore expect increased usage.

The Canal & River Trust therefore request that further discussions take place on this matter to determine if there is support for our request for a contribution, and if so, what would be considered to be an acceptable contribution in line with the Community Infrastructure Levy Regulations 2010 (as amended). Following that discussion, a further revised response will be provided.

Buckinghamshire Council as the Lead Local Flood Authority (LLFA) (dated 8th June 2022)

Buckinghamshire Council as the Lead Local Flood Authority (LLFA) has reviewed the information provided in the following documents:

- Updated Flood Risk Assessment (ref. IVH-BWB-ZZ-XX-RP-YE-0004_FRA, Rev. P07, 14.04.2022, BWB Consulting)
- Updated Sustainable Drainage Statement (ref. IVH-BWB-ZZ-XX-RP-CD-0001_SDS, Rev. P06, 14.04.2022, BWB Consulting)
- Addendum to Appendix 10-3 Hydrogeology Technical Note (ref. B/AXS/CVSMSA/TA001A/21, April 2022, BCL Hydro)
- LLFA Comments Response (ref. IVH-BWB-ZZ-XX-RP-YE-0008, Rev. P01, 08.02.21, BWB Consulting)
- Borehole logs (ref. 2071607)
- Hydrogeology Technical Note (ref. B/AXS/CVSMSA/TA001/21, June 2021, BCL Hydro)

Following my previous comments on 20th June 2021, an updated Flood Risk Assessment (Rev.P07) and Sustainable Drainage Statement (Rev. P06) response has been issued by BWB Consulting on behalf of the applicant due to the revised scheme.

The LLFA has no objection to the proposed development subject to the following planning conditions listed below being placed on any planning approval.

The FRA (Rev. P07) has been updated in sections 3.31, 3.44, 3.45, 3.46, 4.9 in relation to the surface water overland flow routes from off-site sources. The FRA contains a watershed analysis (IVH-BWB-ZZ_XX-DR-YE-0200 Rev.P01) of the flow routes to understand the impact that the above proposals have on surface water flood risk. The westerly flow route will not

be affected by the proposals, whilst the easterly and flow route associated with the watercourse are partially affected. Therefore, the FRA proposes that a filter drain will be constructed around the southern and western extends of the development in the western area of the site to intercept overland surface water flow routes. The proposed filter drain is shown on Surface Water Flow Routes (IVH-BWB-ZZ-XX-DR-YE-0200 Rev.P01). The proposed mitigation satisfactorily addresses the concerns raised in previous correspondence.

Included in the additional information is a Hydrogeology Technical Note which discusses the local groundwater conditions. The Hydrogeology Technical Note sets out that “with the removal of the superficial sand and gravel, the CVS scheme will be constructed across an area underlain by a significant thickness (a minimum 20m) of non-aquifer strata, incapable of supporting groundwater in its own right and separating the surface environment from deeper aquifer units in the locality. It is therefore apparent that the CVS scheme will be at minimal risk of groundwater related flood impact.” The technical note recommends that the collection of groundwater data is maintained for at least a period of 12-months to enable confirmation of water levels expected within the superficial deposit. I support the recommendation that groundwater monitoring should be continued on-site.

Surface water drainage strategy

The Sustainable Drainage Statement has been updated to include references to the surface water overland flow route within Section 2.4. The proposed surface water drainage is shown on the Outline Surface Water Drainage Strategy (Dwg No. IVH-BWB-ZZ-XX-SK-C-0001, Rev. P04) and comprises a series of underground attenuation tanks, detention basins, swales, permeable paving area, rain gardens and filter drains. The surface water runoff from the western and eastern catchments will discharge at the Mean Annual Flood Flow (Qbar), 14.1/s and 10.8l/s respectively, up to and including the 1 in 100 year climate change storm event. The existing slip road catchment will discharge at a rate of 2l/s due to the risk of blockages on a smaller discharge rate. To attenuate surface water runoff from the proposed development up to the 1 in 100 year plus a 40% climate change allowance, an indicative volume of 12,509m³ is required.

I would request the following condition(s) be placed on the approval of the application, should this be granted by the LPA:

Condition 1

No works (other than demolition) shall begin until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- Water quality assessment demonstrating that the total pollution mitigation index equals or exceeds the pollution hazard index; priority should be given to above ground SuDS components
- Discharge rates will be limited to 24.9l/s for the total area, to be split into west and east catchments, 14.1l/s and 10.8l/s respectively
- Ground investigations including:

- Infiltration rate testing in accordance with BRE Digest 365
- Groundwater level monitoring in accordance with Hydrogeology Technical Note (ref. B/AXS/CVSMMSA/TA001/21, June 2021, BCL Hydro)
- Floatation calculations based on groundwater levels encountered during long term groundwater monitoring
- Full construction details of all SuDS and drainage components
- Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS components
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants, or to adjacent or downstream sites.

Reason: The reason for this condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 167 and 169 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

Advice to the LPA: Securing whole life maintenance of the surface water drainage strategy
 We would recommend that the “whole-life” maintenance and management plan for the surface water drainage system is secured by a Section 106 Planning Agreement. The use of a planning obligation (as opposed to a planning condition) would help to safeguard the maintenance and management of these features over the lifetime of the development. The Lead Local Flood Authority are of the opinion that this is a reasonable approach due to the residual risk of surface water flooding to the site should the systems not be adequately maintained.

Advice to the applicant: Land Drainage Consent

Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, the prior consent of the Lead Local Flood Authority is required for any proposed works or structures in the watercourse. After planning permission has been granted by the LPA, the applicant must apply for Land Drainage Consent from the LLFA, information and the application form can be found on our website. Please be aware that this process can take up to two months.

Thames Water

Waste Comments

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission:

"The development shall not be occupied until confirmation has been provided that either:-

1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or-
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan."

Reason

Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning

Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Affinity Water dated 18 February 2021

Thank you for consulting Affinity Water on this application. We have no substantive comments to make.

The development will likely mean a number of changes to our services here and we would as that the developer engages with our Developer Services section as soon as possible. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com.

Thames Valley Police dated 22 June 2022

Thank you for consulting with me on the above planning application. I have reviewed the submitted documentation and consulted with colleagues who routinely police this area. I make the following comments with the aim of addressing the potential for crime and anti-social behaviour occurring at the site and the ability of Thames Valley Police to safely and appropriately deploy from/arrive at the site without unnecessary delay.

From the documents provided the secondary access from the local road network has had the secure vehicular access removed. Whilst we appreciate this is in response to Highways England requirements and the quoted Circular 02/2013 'The Strategic Road Network And The Delivery Of Sustainable Development', our position remains that this has the potential to negatively impact accessibility for Local Policing Area (LPA) resources. We still strongly believe that the circular quoted should be viewed on a case for case basis and believe additional access should be provided to prevent any delay from emergency services attending the site.

We are not proposing that this should be an insecure secondary route and believe the onus should be placed back on the applicant/developer to provide sufficient security including remote access via their security personnel on site ensuring entry only to emergency vehicles.

This will be the second motorway service area (MSA) located within this LPA whereby the first, Beaconsfield, already represents a large impact on our resourcing. Thereby the accessibility of this second MSA is vital to preserve our ability to respond across the LPA in terms of both the MSA's and the local communities. The lack of a direct secondary vehicle access onto the site presents several concerns;

- The ability to redeploy a resource located within the local community and close to the site or from the site and back to the local road network.
- The risk to officers that are not fast road trained but routinely having to access to the site via the M25. These officers will be obligated to address an incident on the strategic network on route to the site but will not be equipped with the appropriate kit, vehicles and training associated with our specialist Roads Policing resources.
- Depleting our specialist trained Roads Policing Officers and vehicles, who would be the most appropriate resource to attend due the limited access from the M25 potentially impacting our ability to deploy to other sections of the strategic road network.
- The potential for congestion on the motorway to delay or prevent us reaching the site especially considered alongside proposals for smart motorways with no hard shoulder access.

If, as proposed the secondary vehicular connection directly into the site is removed, we require (as a minimum) a secondary access route from the local road network without a direct access through the site. This access could terminate where emergency vehicles can be left as close as possible to the site and the main building, allowing officers to continue on foot for a limited distance without incurring a significant delay. From the plans provided the current distance illustrated from the local road network would be considered too great on foot. Any parking area should be adequately covered by formal surveillance however the design should be utilised to remove any obvious visual cues that vehicle access is possible in this location e.g. the use of a wider surface with grasscrete or similar. Management procedures for the site should address the potential for longer response times and should seek to robustly prevent the potential for crime and anti-social behaviour occurring at the site from the outset.

British Pipeline Agency dated 25th May 2022

Having reviewed the information provided, the BPA pipeline(s) is not affected by these proposals, and therefore BPA does not wish to make any comments on this application. However, if any details of the works or location should change, please advise us of the amendments and we will again review this application.

Buckinghamshire Council Tree Officer dated

There are no current Tree Preservation Orders within the site. A parcel of Ancient Woodland (AW) is situated within the site and there are two parcels of AW situated just outside the site on the southern and northern boundary of the site.

The Forestry Commission is a non-statutory consultee on developments in or within 500m of an AW <http://www.forestry.gov.uk/forestry/infd-98uh7n>. Joint standing advice by FC and NE can be found on the following link <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> which outlines what LPA's should consider when development is near ancient woodland or/and veteran trees. The 2nd supplementary planning statement outlines the loss of woodland as well as mitigation in paragraphs 4.6.7 - 4.6.9. Forestry Commission Area Office contact details <http://www.forestry.gov.uk/england-areas>.

I have reviewed amended Arboricultural Impact Assessment (January 2022) by Barton Hyett Arboricultural Consultants which is in accordance with BS 5837 guidance for current planning application CM/0036/21. As outlined in paragraph 9.3. of this document "An AMS and finalised TPP will need to be produced. Where the feasibility of a scheme has been agreed upon by the Local Planning Authority, this detail can be agreed and submitted later as part of a reserved matters application or pre-commencement planning condition (by agreement with the applicant)".

If planning permission is permitted I would suggest following planning condition:

No works or development (including for the avoidance of doubt any works of demolition/site clearance) shall take place until a Arboricultural Method Statement (AMS) with Tree Protection Plan (TPP) has been submitted in accordance with current British Standard 5837 and approved in writing by the Local Planning Authority. Ground protection measures including protective fencing shall be erected or installed prior to the commencement of any works or development on the site including any works of demolition and shall conform to current British Standard 5837 specification guidance. The approved fencing and/or ground protection measures shall be retained and maintained until all building, engineering or other operations have been completed. No work shall be carried out or materials stored within the fenced or protected areas without prior written agreement from the Local Planning Authority. The development thereafter shall be implemented in strict accordance with the approved details.

The AMS and TPP shall include:

- 1.) Detailed plans showing location of the protective fencing including any additional ground protection whether temporary or permanent;
- 2.) Details as to the location of proposed and existing services and utilities including sustainable drainage, where these are close to Root Protection Areas (RPAs);
- 3.) Details as to the method, specification and materials to be used for any "no dig" cellular confinement systems where the installation of no-dig surfacing is within the Root Protection Areas of retained or planted trees is to be in accordance with current nationally recognised best practice guidance British Standard BS 5837 and current Arboricultural Guidance Note 'Cellular Confinement Systems Near Trees (area within the development to which it applies); demonstrating that they can be accommodated where they meet with any adjacent building damp proof courses.
- 4.) Details of all proposed Access Facilitation Pruning, including root pruning, as outlined in current British Standard 5837 guidance shall be carried out in accordance with current British Standard 3998.
- 5.) All phases and timing of the project, including phasing of demolition and construction operations, in relation to arboricultural matters and details of supervision and reporting by a qualified arboriculturist is to be sent to the Local Planning Authority planning department.
- 6.) Siting of work huts and contractor parking; areas for the storage of materials and the siting of skips and working spaces; the erection of scaffolding and to be shown on submitted TPP

Reason:

To maintain the amenity of the area and ensure retained trees, shrubs and hedges are not damaged during all phases of development to avoid any irreversible damage to retained trees pursuant to section 197 of the Town and Country Planning Act 1990 by ensuring the development accords with method statement and that the correct materials and techniques are employed which conform to current British Standard 5837 specification guidance.

Comments dated: 14th October 2022

As you aware I have made previous comments on the above application 14 Jan 2021, 26 July 2021 and 25 May 2022. I have also made comments on CM/0036/21 on 19 Aug 2021, 20 May 2022.

The 20 & 25 May 2022 comments for both applications was in regards to the submitted Arboricultural Impact Assessment (January 2022) by Barton Hyett Arboicultural Consultants. As outlined in the tree report there are a number of veteran trees within or adjacent to the site that are either being retained or removed. I consider this report to be to a high standard in the condition and description of trees within the site.

I visited the site yesterday with Graham who kindly had the AIA report above so were able to view T62, T60, T59, T11. The attached document are pictures of T60, T59 & T11. We could not gain access to all parts of the site so we could not assess T12 & G6.

- T12 is described in detail paragraphs 6.9 - 6.15 as a notable and emerging veteran tree.
- T60 is described in detail paragraphs 6.16 – 6.18 as a notable tree but lack of veteran characteristics.
- G6 is described in detail paragraphs 6.22 – 6.32 and basically this group of alders has a mixture of notable, veteran and ancient trees.

In my opinion:

- T11 notable.
- T59 notable.
- T60 veteran.
- T62 notable.

Richard

Follow up Responses dated 12th and 15th September 2023

Following review of various photographs of T12 in my opinion it would be notable.

T65

They may following recent arboricultural assessment determine to remove this tree for the construction of the SUD but it could be easily retained as a snag/monolith.

I do not consider it to be veteran and agree with the findings of the Barton Hyett Associates AIA (Jan 2022) paragraphs 6.20 – 6.21.

Buckinghamshire Council Archaeological Services (BCAS) (dated 11th November 2021)

The Buckinghamshire Council Archaeological Service (BCAS) has received new information regarding the above application. We maintain the local Historic Environment Record and provide expert advice on archaeology and related matters. As you will be aware, Paragraph 194 of the National Planning Policy Framework (NPPF) states that information held in the relevant historic environment record should be consulted and expert advice obtained where necessary. The NPPF recognises that the effect of an application on the significance of a heritage asset (including its setting) is a material planning consideration.

This letter supersedes the advice given in our letter dated 5 August 2021.

Historic Environment Record (HER) information As per our previous letters, dated 26 January 2021 and 5 August 2021, we consulted the Buckinghamshire Historic Environment Record (HER) and note that the following records are relevant:

* COA = conservation area; LB = listed building; RPG = registered historic park; SAM = scheduled monument; PLN = planning notification area (undesigned area of archaeological interest); HER = historic environment record

Note: some records relate to extensive areas such as historic landscapes, historic towns and villages or areas of high archaeological potential. For full HER information and a licence for commercial use please contact the Bucks HER Officer.

Archaeological and related interests

We refer to our letter dated 26 January 2021, where we requested the following works pre determination;

-Due to the potential for significant Mesolithic deposits to be present, we would request archaeological test pitting be undertaken across the southern area of the application site, as shown in blue on figure 9.17 of the submitted EIA. This work would aim to inform a more detailed deposit model, as well as looking to identify the presence of in situ flint scatters and/or preserved organic remains.

-Following the results of the test pitting, an updated deposit model to be produced which should inform a detailed archaeological Impact Assessment. The Impact Assessment should cover the whole application site.

This additional information was requested to help inform the County Archaeology Service in determining appropriate guidance and mitigation, and to identify where significant archaeology could be preserved in situ if present. As explained in our letter dated 5 August 2021, we welcomed the efforts of the applicant to address the first stage of works, and acknowledge the logistical difficulties faced in attempting to carry out the archaeological test pitting. The updated EIA has not managed to include details of any additional test pits, but it has included detail from previous archaeological works to enable a more detailed deposit model. The results of this work suggest that potentially significant Mesolithic deposits are unlikely to remain within the Site or be impacted upon by the scheme.

We have now received the second piece of works requested, namely an Impact Assessment which covers the whole of the red line boundary area, and also covers the construction compound footprint which lies immediately to the south west. Based on the information provided in this Impact Assessment, we have amended our recommendations for this application. The Impact Assessment has demonstrated that the main impact, where there will be no scope for preservation in situ, is the mineral void. The mineral void is located partially within an Archaeological Notification Area identified due to known and potential Saxon settlement and multi phase activity. Approximately half of the mineral void footprint has already been subject to a geophysical survey, which highlighted a potential enclosure in the north eastern region but no other clear archaeological anomalies. The area of main

impact from the mineral void is at the far north eastern area of the ANA, furthest from the known Saxon remains. It is considered on balance, that the potential for significant archaeological remains to be present within the mineral void footprint is moderate but not high.

With the exception of the mineral void, all of the other areas are shown in the Impact Assessment to have a degree of flexibility in the depth of proposed works, with some areas potentially suitable for preservation in situ.

On consideration of the proposals, the potential significance of the archaeology and the potential for some areas of the site to be preserved in situ if required, we feel that the potential harm to the archaeological resource at this site could be mitigated through appropriately placed conditions on any planning permission granted.

If planning permission is granted for this development then it is likely to harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 205. With reference to the NPPF we therefore recommend that any consent granted for this development should be subject to the following conditions:

-No development shall take place, unless authorised by the local planning authority, until the applicant, or their agents or successors in title, have undertaken archaeological evaluation in form of a geophysical survey and trial trenching in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. Where significant archaeological remains are confirmed these will be preserved in situ.

-Where significant archaeological remains are confirmed, no development shall take place until the applicant, or their agents or successors in title, have provided an appropriate methodology for their preservation in situ which has been submitted by the applicant and approved by the planning authority.

-Where archaeological remains are recorded by evaluation and are not of sufficient significance to warrant preservation in situ but are worthy of recording no development shall take place until the applicant, or their agents or successors in title, have secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority.

The archaeological investigations should be undertaken by a professionally qualified archaeologist working to the agreed written scheme(s) of investigation which should be based on our on-line template briefs.

We would expect the first phase of works, comprising evaluation of the whole application area and the construction compound, to be undertaken in one phase in advance of the mineral extraction works. We acknowledge that some of the application area has already been subject to geophysical survey, so we would not expect these areas to be resurveyed.

However, the trial trenching should cover the whole application site and both phases of evaluation should include the construction compound area despite this lying outside the red line boundary. The evaluation should also include appropriate works to identify evidence of Mesolithic activity, either by additional test pits, or by the sieving of topsoil and plough soil.

Buckinghamshire Highways Development Management (dated 22nd June 2022)

I write further to my comments dated 14th September 2021 in which I had no objection to the proposals subject to obligations and conditions. Since these comments the applicant has submitted a further response to my previous comments to provide clarification on certain matters. These comments should be read in conjunction with my aforementioned previous comments for this application.

Staff/Emergency Access

The proposed access from A4007 Slough Road is now proposed as a staff drop-off/pick-up only, with no vehicular access permitted to the main site, including emergency vehicles. It will instead serve as a non-motorised route into the site for staff members, including the potential for a drop-off/pick-up area for the proposed staff minibus. I am satisfied that this access is sufficient to serve this purpose and will not result in a detriment to the local highway network.

However, it is required that a plan is submitted for this access which includes how the access will be laid out and how it will be ensured that this is solely used for non-motorised staff access. This will then be reviewed by the Highway Authority and can be secured by way of condition. This plan should be provided prior to a decision being made, however, should I not be in receipt of it by this point, I will recommend a condition below for its provision and approval prior to commencement. In addition, to address any concerns regarding inappropriate use of this access, I require the proposed travel plan to include a strategy for the monitoring and managing of this access point.

Traffic Impact

The applicant has agreed to implement controls on the shift patterns and number of admin staff to ensure that these do not conflict with the network peak hours in future. They have suggested that this is formalised into the Travel Plan submitted and secured as part of the application. The Highway Authority can confirm that this is sufficient, however this should also be referenced as a distinct clause in the s106 agreement to ensure the obligation remains after the 5-year lifetime of the Travel Plan.

Re-alignment of Slough Road

A Stage 1 Road Safety Audit (RSA) has been submitted by the applicants for the proposed Slough Road access and realignment of the Slough Road. Having assessed this, I am satisfied that most of the recommendations as stated within this have been accepted by the applicant, other than the provision of a right-hand turn lane into the proposed access from

Slough Road. Having reviewed this further and consulted colleagues in other teams, it is considered that the problem identified by the auditor is valid and a right-hand turn lane is therefore required. There is already ghost hatching in the centre of the carriageway which would allow for the inclusion of this feature. The other improvements as identified will also be subject to detailed design and a Stage 2 RSA.

It is noted that the re-alignment of Slough Road has allowed for the inclusion of a 3m wide footway/cycleway on the southern side of the carriageway which ties in with the existing network. This is positive in encouraging staff to travel to the site by sustainable modes of transport and is therefore a welcomed improvement.

Layout and Parking

The applicant has confirmed that the required level of electric vehicle parking will be provided within the site.

Sustainability and Framework Travel Plan

The applicant has agreed that bus stop upgrades on the Slough Road can be provided in line with the s106 as stated within my previous response. These upgrades were requested by the Passenger Transport Team and is therefore considered the most appropriate improvements for this site.

As aforementioned, it is also required that the monitoring and managing of the proposed non-motorised staff access, including the drop-off point, is included within the travel plan for the site to ensure that it is not used inappropriately.

In addition, as previously requested, the applicant has agreed to the provision of a puffin crossing on Slough Road. In light of the drawings provided which demonstrate the provision of a footway/cycleway on the southern side of Slough Road (drawing number JNY10850-20 Rev C), this crossing will now need to be in the form of a toucan crossing to adequately cater for cyclists accessing the site. The Highway Authority does not deem this change to be materially different from the previously proposed 4m wide puffin crossing.

However, the crossing has now been re-located appears to the east of the site access, and not to the west as previously considered. Given that the existing bus stops are located on the west side of the access, the crossing no longer falls on the desire lines for staff members. However, it is acknowledged that the change in location may have been a result of the levels of achievable forward visibility due to the bend in the carriageway in this location. It is also noted that the provision of this signalised crossing has not been included within the submitted stage 1 RSA due to being proposed following this audit. It is therefore considered that this will need to be included within an RSA to ensure any potential risks are adequately addressed.

Following a review of the drawing submitted and the levels of forward visibility which can be achieved within highway land, the location of this crossing does appear acceptable,

although this will need to be subject to the submission and approval of relevant technical details and RSA's.

The Highway Authority accepts that to achieve technical approval adjustments may be required to the precise location of the crossing and the proposed road markings will need to be revised at a detailed design stage to conform with the Traffic Signs Regulations and General Directions document. This is not of concern to the Highway Authority as long as the purpose of the crossing remains.

Construction Traffic

As previously mentioned within my first response to this application, it is noted that there is to be a period where construction traffic shall be requiring access from the A4007 Slough Road, until such a time as direct access has been created from the M25, approximately 3 months. This is a temporary impact on the local highway network, and as such the impacts shall be addressed and managed through the requirement to provide a Construction Traffic Management Plan (CTMP).

Along with the information required as set out within the previous response (also contained within the condition below) this plan must also address the construction impacts for the construction of the realigned section of the A4007 Slough Road. Careful coordination will be required between the Highway Authority controlling the A4007 and National Highways. This shall be a requirement that the CTMP shall have to detail and explain.

It is also required that the CTMP sets out measures to ensure that construction traffic maintains adherence to appropriate routes, and minimises impact on sensitive locations, including but not limited to local primary schools and junctions to the west of the site on Bangors Road.

Conclusion

Mindful of the above, the Highway Authority does not object to the proposed development subject to the submission of further road safety audits and the following obligations and conditions being included on any planning consent you may grant:

S106 Obligations

The obligation for the monitoring and managing of a full Travel Plan, including the payment of a £5000 developer contribution towards a Travel Plan monitoring fee which is calculated as £1000 per annum for 5 years.

Upgrading of both bus stops on Slough Road to provide bus shelters and RTPi services. This includes a total payment of £20000 for bus shelters and £16000 to provide RTPi services. The exact specification of bus shelters at this location is not yet defined, however it would not exceed the sum requested.

Buckinghamshire Council Strategic Access (dated 8th July 2022)

Please read these comments in conjunction with my earlier comments loaded on the planning portal 15 APR 2021.

A4007 Slough Road [A4007 cycling improvements]

The proposed 3m wide footway/cycleway connecting along the south side of Slough Road from the new vehicular access in an easterly direction towards Uxbridge, is welcome as it complements the cycling and walking network provided along Bridleway IVE/32/1 through the site and Bridleway IVE/33/2 south of the A4007 Slough Road. The proposed controlled Toucan crossing will facilitate walkers and cyclists crossing this road in the vicinity of the proposed new vehicular access and provide a more connected rights of way network between Iver and Pinewood.

Slough Road [A4007] controlled crossing

With the above in mind, Highways Development Management's Condition 5 recommends pre-commencement submission of plans for a Toucan crossing of Slough Road for walkers and cyclists, with construction pre-occupation via s278 Highways Act 1980 agreement.

However, mindful of the British Horse Society's comments [MRS PETRONELLA NATTRASS 12 FEB 2021] confirming Bridleway IVE/32/1 through the site is currently used by horse riders with stables and yards situated south of the A4007, wishing to make onward connections to Sevenhills Road and Black Park in the existing situation, it would be helpful to include some equestrian provision on the Toucan crossing. This would facilitate horse riders making the connection along the vehicular highway network between existing bridleways.

Equestrian traffic is likely to be light and occasional, so the shared space across the proposed Toucan crossing should be adequate. However, to avoid horse rider's being forced to dismount [with a need for mounting blocks either side] or be forced to cross at less safe locations other than at the Toucan crossing, some Pegasus crossing features should be added.

Ideally, a 2m high push-button unit with horse symbol, attached to a pole, set back from the vehicular running lane [compliant with Pegasus design], should be installed. The wider standard design on approach could be less onerous if space is limited within the highway extent, as recommended by BHS advice [www.bhs.org.uk/accessadvice] for Pegasus crossings, for example.

I have sought a minor text amendment from Highways Development Management to their bullet point highlighted yellow above, to be replaced with:

- Controlled crossing of the Slough Road, at least to Toucan design, with Pegasus crossing features included where space allows within the highway extent;

The above will mitigate the increased vehicular movements relating to the pickup and drop-off area and junction, and allow safe passage of horse riders in addition to walkers and cyclists.

Diverted Bridleway

IVE/32/1 The Illustrative Landscape Masterplan [Drawing: LP2226-FIRA-MP-ST-P-LA-WS-001] provides the best illustration of the diverted bridleway. With regard to the proposed new alignment, my earlier comments generally remain the same, which concluded the diversion was satisfactory, subject to maintaining an unplanted corridor of 6m, with a surface of width comparable to the existing situation [3m wide].

The Landscape Masterplan appears to show scattered blocks of trees through which the bridleway passes in a wide corridor.

Any proposed scrub is a concern as this would, over time, naturally spread across areas between trees and could physically narrow the width. Moreover, any proposed trees planted too close to the bridleway would shade the surface from drying, possibly rendering winter use inconvenient compared to the existing bridleway passing along open, arable field edges. I trust this can be overcome by regular management of an unplanted corridor through the woodland/scrub planting areas to avoid natural seeding; and by securing a generous, unplanted corridor width with detailed plans.

The profile drawing do not seem to demonstrate a good width. For example, the cross-section E – E in the Design & Access Statement [p.48] indicates the bridleway is enclosed tightly by trees in the central section, in contrast to the Landscape Plan which is wider. Therefore, a shadier corridor than existing is indicated [at least on the profile] which doesn't benefit from drying by sunlight and wind, which is a concern.

However, there's no scale bar in this profile and I can't measure off it electronically at 1:100, except to scale from the '30m landscape buffer' width, though this may only be indicative. If not, then the bridleway corridor is only around 3.3m which is far too narrow. The north-western bridleway plan and profile is provided at A – A, but I'm not confident measuring off it accurately on the plan provided. This corridor, and that north of profile A – A, should be at least 4m wide to reflect the existing field edge situation between fence and hedge.

In light of the above I have recommended increasing the unplanted corridor from my previous recommended 6m to a revised 8m through the central and southern woodland sections, which appears achievable for both these areas. Detailed plans illustrating the 8m [central and southern] and 4m [north-western] corridors could be covered by condition, together with a vegetation management plan to ensure they remain clear of natural seeding.

Please also note my previously recommended conditions and informative from 15 APR 2021. [If you agree, Condition 1 will need a slight amendment to remove reference to the '30m-wide green infrastructure and landscape buffer' as I'd not realised at the time it variously measures around 60m in width through the central section and wider, of course, further north-west].

Condition Prior to the commencement of development, detailed plans illustrating provision of a clear, unplanted diverted bridleway corridor of 8m between scrub and/or tree planting through southern and central sections shall be submitted to and approved by the LPA, together with plans illustrating at least a 4m width through the north-western bridleway corridor. This should be accompanied by an annual vegetation maintenance plan to ensure these corridors are kept clear from natural seeding and undergrowth. The plans and maintenance scheme shall thereafter be carried out in accordance with the approved details prior to commencement and during the lifetime of the MSA.

Reason. In order ensure safe and convenient use of the diverted bridleway network through the site, comparable with the existing unenclosed situation which facilitates surface drying, and to ensure the public amenity is protected in accordance with Local Plan Policy CP7 and para 100 NPPF 2021.

Buckinghamshire Council Strategic Access (dated 15th April 2021)

The overall sustainability of the site in transport terms against NPPF and Local Plan Policy CP7 will be assessed by Highways Development Management. I will comment only on routes that contribute to active travel for MSA employees along the rights of way network, but might also provide mitigation to improve recreational provision into the greenbelt and improve sustainable transport options for local residents in the form of walking and cycling.

Nevertheless, Highways Development's comments are noted, which conclude the need for:

“...a full set of proposals for improvements to the sustainable travel network that will be required to deliver the Framework Travel Plan objectives.”

I have outlined the site's red edge onto the Ordnance Survey base map in Plan 1 to illustrate Bridleway IVE/32/1 directly affected and the surrounding rights of way network between the London Borough of Hillingdon, Iver Heath and Pinewood Studios, situated to the north-west.

M25 works - the 'Extent of Proposed M25 Improvement Works' drawings are noted. I have assumed all works lie within existing Highways England boundaries and do not physically affect any public rights of way. Footpath IVE/7A/1 (see south-eastern part of Plan 2, off Slough Road, and Plan 3) will be impacted partly by the M25 Smart Motorway proposals (red arrow), which will become a new lane on the M25 and a new accommodation bridge (green) will replace it (blue arrow). A de facto route exists for pedestrians under the M25 alongside the Colne Brook, but users have to stoop under the bridge to make onward connections.

A length of Footpath IVE/1/1 (green dashed line on Extract 1) lies north of Sevenhills Road and within a red edge indicating Highways England's land control, but this appears to be unaffected by the proposed M25 works.

Bridleway IVE/32/1 is proposed to be relocated to the west of the MSA, largely following a linear route inside the red edge shown highlighted yellow in Extract 2. I understand most of the land this side of the M25 falls, north of Slough Road and south of Denham Road lies within Buckinghamshire council's control as landowner for the application.

The character of the existing bridleway and farm vehicle access is illustrated in the Design & Access Statement (Extract 3). This appears to be a slightly raised, loose stone track with grass growing in the middle, surfaced to perhaps 3m, set within a corridor of approximately 5m between hedges (including verges).

The new alternative bridleway is longer than the original (1,136m vs 968m), but not to the extent of overly inconveniencing users, I would suggest, and benefits from being further away from the M25 traffic noise. The new route is proposed to pass through a wide, green infrastructure (GI) corridor (30m wide) where users would be largely unconstrained by fences. Presumably further GI details will follow at detailed design, and I assume the 30m GI corridor will be conditioned as necessary and appropriate by others, but I would suggest a bridleway corridor of at least 6m-wide to be unplanted within that buffer. I would not consider this bridleway (Denham Lane and Sevehills Road to Slough Road) likely to be overly popular for walking or cycling to the MSA by employees so would not consider it necessary to upgrade the surface for commuting, e.g. bitumen. The A412 Denham Lane has high vehicular use likely to discourage all but the most confident cyclists and although there is an offroad bridleway connection to Sevenhills Road, this doesn't connect directly to large areas of residential population. Nevertheless, I would consider the diverted route surface conditions should be replaced like-for-like with the existing track illustrated above in Extract 3, that is surfaced with a loose stone material to 3m width, set within a generous, unplanted corridor. The bridleway might double-up as farm vehicle access (there are no details) so may need additional depth of construction to withstand farm machinery, but otherwise there are standard depths for bridleway construction that can be covered by condition.

I have received correspondence from concerned local horse riders and the British Horse Society central office since the application was submitted. However, overall, and subject to replicating the existing track and surface conditions, I consider the alternative would be suitable and attractive for equestrians, cyclists and pedestrians, with no loss in amenity; perhaps an improvement on the existing situation being some distance from the motorway noise pollution which detracts from quiet enjoyment of the countryside.

Further details will need to be included at detailed design on the bridleway's connection onto the publicly maintained highway along Slough Road A4007 and possible safe negotiation of employees being dropped-off. Mindful of Highways Development Management's comments regarding the proposed staff/emergency vehicular access this area may be subject to amendments, but certainly removing full employee vehicular access here would greatly benefit rights of way users by improving safety and amenity, including access south across Slough Road to Bridleway IVE/33/2. Nevertheless, I have included an informative to cover the legal diversion process under s257 TCPA 1990.

Footpath IVE/5/1 passes generally east to west between Bangors Road North and Slough Road. In the existing situation it is characterised as a rural, arable field edge path, before

running through a strip of woodland (beside and to the rear of properties, e.g. The Elms) leading to Bangors Road North. In the development situation this would serve as a useful and attractive commuting route for walkers and cyclists from the Iver Heath area, avoiding the busy Slough Road A4007, which has high vehicle flows and no formal segregated facility for cyclists.

I would suggest the surface of this route is upgraded suitable for walking, cycling and horse riding and suggest a rubber crumb design which similarly reflects the solution reached for equestrian and cycling access to the Chalfont St Peter MSA. In addition, upgrading the legal status to bridleway enables cycling for MSA staff wishing to commute to work without committing trespass, and compliments the existing bridleway network in the area. This would be a benefit of the scheme both for existing recreational users and those wishing to commute between Iver Heath and Uxbridge by non-car modes. Two conditions are recommended.

Future-proofing the Colne Valley Regional Park's (CVRP) Route MC101 – Extract 4 illustrates the development allows for the future provision of the strategic walking and cycling ambition set out by the CVRP (my yellow highlighting).

More widely this aims to connect Uxbridge train station and NCN 6 along the Grand Union Canal with Iver Heath and Pinewood Studios. I would hope wording can either be included in any s.106 agreement that secures provision of a route in perpetuity from Bridleway IVE/32/1 and over the M25 Mansfield Farm bridge to the council's land holding east of the M25, as broadly illustrated on Extract 4. Alternatively, if not included in the s106 Agreement, I have suggested a condition (No. 4). Existing farmland on both sides is in public ownership (between Bangors Road North and A4020 New Denham), so potentially an achievable ambition in the medium to long term and complimentary to the proposed new public access provision within the restored New Denham Quarry (CM/0004/21).

I would not seek formal dedication of a bridleway now as it would be sensible to wait until eastbound connections to New Denham and NCN 6 can be achieved and agreed, but securing a connection in principle within the s.106 Agreement or by condition provides the necessary assurance and legacy from the development and should be considered a benefit to the application in terms of future active travel options and enhanced recreational access to the greenbelt and CVRP from the London Borough of Hillingdon and Iver Heath.

Additional enhancements – in Extract 2 above the application suggests an additional connection south-west from the new bridleway diversion (east of the property Ensby's, SLO 0BJ) to Bangors Road North. The council's Property Services, as landowner of the application, is content with this proposal as a new bridleway provision dedicated under s25 Highways Act 1980, as I've sketched orange in Plan 4. I would welcome this addition to the network as part of the overall mitigation package: it offers an additional convenient connection to Sevenhills Road avoiding the busy Denham Road A412 and a circular walking, cycling and horse riding opportunity for Iver Heath residents. This can be secured within the s106 or by condition, but I would request an additional blue edge plan covering this linear route in order the improvements can be conditioned.

A4007 link into Hillingdon - conversations have taken place between Buckinghamshire and Hillingdon council highway authorities regarding a possible contribution from this application to the provision of segregated cycling facilities alongside the A4007 Slough Road between the MSA's new junction and Hillingdon borough. Unfortunately, no feasibility study currently exists, but this is something I would fully support as it provides a useful strategic connection: both east to west (Hillingdon to Iver Heath/Pinewood/Black Park) and includes north to south onward links (NCN 61/B470 to Sevenhills Road). However, as this is on the vehicular highway network it's not something to which I can comment upon further, other than to offer support.

In light of the above, the following is recommended.

Condition 1

Prior to the commencement of the construction, a scheme for the resurfacing and provision of the alternative route for Bridleway IVE/32/1, shown indicatively on the Illustrative Masterplan passing from the M25's western boundary, through the 30m-wide green infrastructure and landscape buffer to the A4007 Slough Road, shall be first submitted to and approved in writing by the LPA, in consultation with and to the satisfaction of the highway authority. The bridleway shall subsequently be resurfaced and upgraded with Breedon gravel, to manufacturer's recommendations appropriate for bridleway and/or agricultural use, in accordance with the approved details, prior to the first occupation of the MSA hereby approved.

Reason 1 To ensure the bridleway is provided in a suitable condition to replicate the existing recreational amenity lost within the development and to encourage and promote sustainable access to and enjoyment of the greenbelt from surrounding communities; and to comply with guidance in the National Planning Policy Framework and Local Plan Policy CP7.

Condition 2

Prior to the first occupation of the MSA hereby approved two new bridleways shall be dedicated under Section 25 Highways Act 1980, to the satisfaction of the highway authority, across land within the control of the owner for the application. For the avoidance of doubt this shall include: 1) the whole of Footpath IVE/5/1; and 2) a route between Bangors Road North and the newly diverted Bridleway IVE/32/1, either at a point 164m east of the property Ensbys, SLO OBJ or otherwise along a route in agreement with the highway authority.

Reason 2

In order to enable cycling as a means of active travel for employees to access the MSA; to provide a lasting recreational legacy for the local community and Colne Valley Regional Park; to contribute to wider strategic aims to improve cycling connectivity between Pinewood Studios, Iver Heath and Hillingdon Borough residential areas, Sustrans NCN networks and Uxbridge train station; and to comply with guidance in the National Planning Policy Framework and Local Plan Policy CP7.

Condition 3

Prior to the occupation of the MSA hereby approved, a scheme for the resurfacing and provision of Footpath IVE/5/1, with status upgraded to bridleway, shall be first submitted to and approved in writing by the LPA, in consultation with and to the satisfaction of the highway authority. The bridleway shall subsequently be resurfaced and upgraded with rubber crumb, to manufacturer's recommendations appropriate for bridleways, in accordance with the approved details.

Reason 3 In order to allow cycling as a means of active travel for employees to access the MSA; to provide a lasting recreational legacy for the local community and Colne Valley Regional Park; to contribute to wider strategic aims to improve cycling connectivity between Pinewood Studios, Iver Heath and Hillingdon Borough residential areas, Sustrans NCN networks and Uxbridge train station; and to comply with guidance in the National Planning Policy Framework and Local Plan Policy CP7.

Condition 4

At the timing of the LPA and Highway Authority's choosing, the landowner for the application shall dedicate a new bridleway under s25 Highways Act 1980, between Bridleway IVE/32/1 and a point east of the Mansfield Farm M25 agricultural access bridge along an alignment which generally follows the alignment in 2021 of the existing agricultural track up and including to the aforementioned M25 accommodation bridge.

Reason 4

To provide a lasting recreational legacy for the local community and Colne Valley Regional Park; to contribute to wider strategic aims to improve cycling connectivity between Pinewood Studios, Iver Heath and Hillingdon Borough residential areas, Sustrans NCN networks and Uxbridge train station; and to comply with guidance in the National Planning Policy Framework and Local Plan Policy CP7.

Natural England (dated 4th August 2021)

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Natural England's further advice and recommendations on designated sites/landscapes and advice on other natural environment issues is set out below. We have made recommendations for appropriate planning conditions or obligations that could be attached to any planning permission to secure the measures discussed below.

Kingcup Meadows and Oldhouse Wood SSSI and Black Park SSSI

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

Local sites and priority habitats and species

A condition stipulating the implementation of a Construction Environmental Management Plan (CEMP) as detailed in Table 6.4 of the Environmental statement chapter 6 dated December 2020 should be implemented to prevent disturbance or damage to ecological assets.

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the MAGIC website or as Local Wildlife Sites. List of priority habitats and species can be found here ([weblink](#)). Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here ([weblink](#))

Biodiversity Net Gain

We welcome the use of the Biodiversity Metric 2.0 and the aspiration to provide biodiversity net gains in excess of 10% as stated in section 6.7.1 of the Environmental Statement (chapter 6) dated December 2020.

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. Planning Practice Guidance describes net gain as an 'approach to development that leaves the natural environment in a measurably better state than it was beforehand' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the Biodiversity Metric 2.0, can be used to measure gains and losses to biodiversity resulting from development. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain.

Ancient woodland, ancient and veteran trees

The proposed development is located adjacent to a patch of ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications.

Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Forestry Commission (dated 3rd August 2021)

Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on Ancient Woodland. As a non-statutory consultee, the Forestry Commission is pleased to provide you with the attached information that may be helpful when you consider the application:

- Details of Government Policy relating to ancient woodland
- Information on the importance and designation of ancient woodland

As well as our standard advice below, we would like to add the following comments in light of the amendments to the application.

SUMMARY: We are encouraged that the development has taken into consideration our previous comments, and has applied Biodiversity Net Gain principles to this project.

We are pleased to see the off-site mitigation is directly adjacent to the site, helping to develop and maintain links between woodland habitats. The diverse mix of species is appreciated, as is the width of the shelter belts, which will help the woodlands operate as a functional habitat unit.

We also appreciate the strong use of trees within the red line boundary, both as buffering areas for the ancient woodland, as habitat creation, and as landscape trees within the car park, dog walking and other landscaped areas. We would recommend that areas buffering the ancient woodland be planted with some similar species to those already found, while keeping the mix diverse to ensure future resilience to climate change and pests and diseases.

We recommend that for all woodland areas a ten-year management plan be created to ensure the successful establishment of the new woodland, setting out the regime for weed and pest management, replacement of any failed trees and removal of tree guards once established, and a further plan for its ongoing maintenance and management once established. The Forestry Commission would be pleased to offer further advice in both of these regards to the applicant.

Colne Valley Regional Park -

Response dated May 2023

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 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.

This paper sets out the justification for possible mitigation if the application for the Motorway Service Area is to be recommended for approval.

1. Description of the Site The site is divided by the M25 motorway. To the eastern side is the road access to the Iver Environment Centre and Mansfield Farm together with an area of land with a tributary of the Alderbourne running through it which is liable to flood. This land is where the southbound access slip road to the MSA will be located. To the west is farmland in connection with Mansfield Farm accessed by a farm track over the motorway. The land is owned by Buckinghamshire Council and was part of the public landholding to keep the Green Belt open. There is a bridleway and footpath passing through the land. The land is mainly flat but slopes down towards the motorway, particularly in the southeast corner. The motorway is in cutting and passes under the A4007 Slough Road. There is one property along Slough Road and adjacent Ancient Woodland which are both excluded from the application site.

2. The Applications There are two applications, the first for the extraction of gravel from the site which will if approved, will lead to some reprofiling of the landscape. The second for the Motorway Service area (MSA) which includes parking for lorries, a central service building and car parking. The hotel which formed part of the original application has now been deleted. The application also includes landscaping and a diversion of the bridleway around the edge of the site. The application has been delayed in its determination by National Highways who blocked consideration until they resolved policy on Smart Motorways and slip road access. The application has also been significantly revised in 2022 including the removal of the hotel proposal.

3. Policy Implications

The site is located within the Green Belt and in public ownership. Unfortunately, although this is a significant factor in determining the application – in government policy terms it must be recognised that National Highways must take into account the government Circular on MSAs which determines the frequency of MSAs and in this case has determined that there needs to be an MSA in this sector of the M25. There have now been four proposals by private operators, including this one, between Junctions 15 and 18 of the M25. Of these 4, one has been refused by Three Rivers District Council at junction 18; one has been refused following an appeal between Junction 16 and 17 and there are two outstanding applications – both to be determined by Buckinghamshire Council both on this site and one between Junctions 16 and 17 but opposite the location of that refused on appeal. This site is the only one on land owned by Buckinghamshire.

A number of national and local policies and guidance detailed below require the provision or improvement of green infrastructure and biodiversity improvements.

National policy in the NPPF refers to mitigation when development happens through VSC in the Green Belt. This paragraph outlines that LPA's should seek mitigation and improvement when opportunities (such as planning applications proposing development in the GB) arise.

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.

In addition, NPPF policy on climate change is relevant.

154. New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

Local Nature Recovery strategies are also relevant. Guidance published in March 2023 states in para. 82

82.If a responsible authority has Green Belt in their area, they should actively seek to target areas that could become of particular importance inside the Green Belt. This supports the government's intention for Green Belts to provide multiple benefits, including nature recovery and increased public access to nature. Similarly, responsible authorities should also look for areas that could become of particular importance near to people's homes to improve public access to nature, biodiversity, and environmental benefits.

This guidance is particularly important in this area near the town of Uxbridge where access to the countryside could be improved.

Since the application has been submitted the Ivers Neighbourhood Plan has been submitted and adopted for policy making. Policy IV 13 is pertinent.https://www.iversparishcouncil.gov.uk/wpcontent/uploads/sites/55/2021/12/IV1_Local-Gaps-scaled.jpg

South Bucks Core Strategy although out of date in terms of Green Belt as it does not refer to the Very Special Circumstances provision within the NPPF, which would allow the MSA in Green Belt terms, also has CP9 which protects to some extent the Colne Valley Regional Park.

The Proposals Map of the Core Strategy also shows the site is within a biodiversity opportunity area.

As the application involves extracting minerals The Buckinghamshire Minerals and Waste Plan policies 24 and 25 seek to enhance the characteristics and qualities of the CVRP when considering the provision of green infrastructure and opportunities for access and recreation.

4. Colne Valley Regional Park

The 6 objectives of the Park are relevant in terms of mitigation for the MSA if approved. CP9 of the Core Strategy gives policy backing for our mitigation requests as does the Minerals and Waste Plan. The application if approved would involve loss of land within the Park, loss of productive farmland and would impact the existing rights of way across the site. There would also be a significant impact on the landscape, both visually in terms of the built environment, lighting and excessive noise.

5. Colne and Crane Green Infrastructure Strategy

The Mid Colne Section of this strategy <https://www.colnevalleypark.org.uk/wp-content/uploads/2019/10/GI-Strategy-AREA-2-Mid-Colne-pages-42-49.pdf> is incorporated in the Ivers Neighbourhood Plan so is now policy that must be taken account of in the determination of this application. MC101 is the indicative strategic link from Black Park to Uxbridge.

6. Mitigation Request

There main elements for consideration are:

- The potential for either relocation of Iver Education Centre to a location within the development site – preferably in the western section of the site at the expense of the applicants or investment in mitigation, compensation, and extension of current facilities on the north and east side of the centre. The Iver Education Centre is used to educate children about the environment and to this end most teaching takes place outside using the on-site pond and allotments, 6 days a week. This level of teaching once the development takes place would be noisy, harmful, and potentially unsafe. The current site is on National Grid Land and subsidised by them.
- Delivery of Active Travel routes between Uxbridge and Black Park. See map below. This would need to be partly delivered by the developer and partly by Buckinghamshire. A new ROW would be delivered, both a footpath and cycleway running west – east across the site

and over the current farm bridge into land on the eastern side, owned by Buckinghamshire which would feed into routes within Uxbridge. Para 4.18.21 of the supplementary Planning Statement submitted with the application confirms that a new permissive footpath link would be provided using the existing farm bridge across the motorway. Although we query why this needs to be a permissive footpath and why it should not be used by cyclists and horse riders. This is a key aspiration of the Colne and Crane GI study and should be implemented. We recognise however that the eastern side of the motorway (New Denham Quarry), although in the ownership of Buckinghamshire Council currently has no public access and is outside the red line of this planning application. However, Buckinghamshire should accept that when this land is available (after the gravel extraction has finished) this request should be delivered. It should be noted that the existing right of way across the site does not currently cross the motorway via the farm bridge but continues northwards along the edge of the motorway before crossing the motorway on the road. This is currently unpleasant and noisy, and a considerable benefit would be had by crossing the motorway on the farm bridge and would be a more direct route into Uxbridge.

- Mitigation for the Alderbourne along its length but particularly from Fulmer to the motorway in conjunction with local landowners where applicable.
- There should be a Countryside Management approach for the maintenance of the land surrounding the MSA which will continue to deliver the proposed 86% Biodiversity Net Gain by the developers. This could be managed by the CVRP subject to a management fee and ongoing costs for staff, equipment and resources. All to be agreed.

This would include:

- Continued improvements to biodiversity – including the planting and maintenance of hedgerows and woodland,
- management of the Alderbourne and its tributaries
- general landscape improvements.
- The costs of this should be covered by the applicant for a period of at least 25 years.

The Strategic Access Officer at Buckinghamshire has also requested cycling and horse-riding improvements along the south side of the A4007 connecting with Iver and Pinewood. This is supported, although this should not be a permissive path but a designated route.

In conclusion these suggested projects would comply with the requirements of National and Local Policy necessary to mitigate for the considerable harm that this application will cause to the Green Belt and the Colne Valley Regional Park and provide for increased green infrastructure and biodiversity improvements in the long term.

Response dated June 2022

The Colne Valley Regional Park (CVRP) has carefully reviewed the amended submission. We note certain minor, positive changes, but consider that these fall well short of the fundamental change that would have been necessary in order to meet the significant CONCERNS PREVIOUSLY identified. Further, they not address the points raised by the CVRP or the call for mitigation in our responses of February 2021 and August 2021 (we regard this as a missed opportunity and hope that it will be possible to reconsider in the light of the points below). However, in the absence of such amendments the CVRP therefore maintains its position of objecting to this intrusive and damaging development in the Green Belt.

Specific Issues of Concern

Iver Environment Centre Impact

Contrary to what is stated in the ecological report: Great Crested Newts are located at Iver Environment Centre. This has been confirmed in a study by Wildwood Ecology and should inform the ecology report, site design and mitigation. In addition, there is no reference to the impact of the slip roads on Iver Environment Centre. Mitigation for the Centre is critical as part of a package to address the direct and significant impact the development would have on the Green Belt (GB) and Colne Valley Regional Park.

Insufficient consideration of biodiversity needs

The developer pledges to provide new woodland and wildflower meadows to contribute to Biodiversity Net Gain. It should be recognised that this planting will not contribute positively to biodiversity and screening from Iver Heath for a considerable time. There must be a clear plan and appropriate resources for its management in perpetuity, ideally allocated to a local environmental or community organisation.

The need for less intrusive development

If the scheme is to proceed further, its layout and building design must be modified to create a 'greener' less intrusive, development. This needs to incorporate excellent permeability across the site as part of an off-road green link between Uxbridge and Iver Heath/ Black park/Pinewood for walking and cycling, set within generous infrastructure corridors. We welcome proposals for public access over the motorway contributing a link between Uxbridge and Black park, albeit that this is still on a permissive basis.

Flooding Issues and the proposed culvert of the Alderbourne

We agree with the Environment Agency's objection to the proposed culvert of the Alderbourne because of the impact this would have on the biodiversity of the river, and that it would not be compatible with the Water Framework Directive.

The application states – wholly incorrectly- that there is no flooding on the east side of the motorway. In fact, the field beside the Alderbourne regularly floods throughout winter. The Council and the developers must also consider what impact the removal of the

huge quantities of sand and gravel from the main site will have on the hydro geology of the wider area.

Warren Farm MSA Inspector's report and the Green Belt

The Warren Farm appeal decision is quoted extensively in the developer's amended submission, where the inspector felt that Iver Heath was a better site than Chalfont St Peter) for an MSA.

In Green Belt terms – somewhat surprisingly – the inspector does not regard Iver Heath as a built-up area, concluding the impact on Green Belt between Uxbridge and Iver Heath would be minimal. We consider this to be fundamentally wrong, not least because it is directly contrary to the 2018 Arup Strategic Green Belt Review for the former South Bucks and Chiltern Councils. This area was categorised as part of the coherent 'London Fringe' zone. The report highlighted the characteristics and sensitivities of the part of that zone including the application site, referring to:

...a strategic arc of open spaces separating large built-up areas of Greater London and Slough, and smaller settlements such as Iver and Iver Heath...

...a number of narrow bands of Green Belt are vitally important in preventing the merging of settlements'

...these gaps are essential in protecting the merging of the major urban settlements of Greater London and Slough..

...any change within this area could act to significantly compromise the role played by the Green Belt in maintaining separation between these two large urban settlements.

We agree with the report's assessment in 2018 and see no reason to depart from it in the context of the proposed MSA.

Cumulative impact on the Green Belt.

The CVRP is conscious the development demands being placed on the Green Belt in this part of the Regional Park are both individually, but also cumulatively, very significant. Unless government policy reversed – and there is currently no prospect of that happening – the Green Belt remains a core tool of the country's planning system, particularly in the absence of a Buckinghamshire Local Plan and a positive vision for the future of this increasingly threatened part of the Green Belt.

It is essential that the current application is seen in the context of the cumulative, substantial proposals submitted for the area including Pinewood expansion, Data Centres and battery storage areas. A cumulative impact assessment must be carried out. We recognise that different proposals at different stages of the planning process it is challenging, but the Council must rise to that challenge, be proactive and implement a positive vision for the future of this increasingly threatened part of the Green Belt, even if through its handling of individual applications, rather than through a Local Plan. The Colne

Valley Regional Park is important for people, wildlife and food production. It is an area of the Green Belt that must not be whittled away by a series of ad hoc decisions.

Our strong view is that with each significant incremental step to develop land in the Green Belt, the harm caused to it overall increases rapidly. In this case, while the proposal itself is very substantial and will have a significant impact, it must also be assessed as part of the cumulative changes to date that have led to the deterioration to the Green Belt from the baseline set when it was designated. Should the Green Belt become so urbanised compared with the baseline, its integrity will be seriously – quite possibly fatally – compromised. The Iver Heath area is at that turning point.

Mitigation and the Green Belt.

Once Green Belt is defined, NPPF Para 145 requires local planning authorities to ‘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.

It is well established that the natural environment and recreation opportunities provided by the Green Belt offer a critical physical and mental health resource for the wider population, as well as being important for wildlife and food production. Its protection and enhancement for the long term is fundamental to the role of the CVRP. Once that resource is lost to development, it is lost forever. This flags the importance of there being a scale of mitigation proportionate to that of the development and the harm arising from it.

NPPF Para, 142 includes the following (our underlining):

‘Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by transport. They should also set out ways in which the impact of removing land from the Green Belt can be off-set through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.

We argue if (contrary to the points set out in this and our previous submissions, and in the fundamental changes to address them) Buckinghamshire Council is minded to accept the Very Special Circumstances for such a huge development, it is incumbent on the authority to consider how to foster the beneficial role of the (remaining) Green Belt as part of the Off-setting the harm associated with the development. NPPF para 142 provides a framework for that in a manner consistent with the positive approach to existing Green belts by local planning authorities, called for by government NPPF para. 145.

Good planning must prevail: even if the decision-maker considers there to be a persuasive case for the development, the level of mitigation proposed falls a long way short of what would be needed to outweigh the harm identified arising from the fundamental inappropriateness of this large development. Application like this require a total change of approach, until that is achieved, we cannot see that on any reasonable view the ‘very special circumstances’ test could be considered to be satisfied.

In this context we would refer the local authority and the developer to the call in our submission of February 2021 for mitigation to address the impact of this development on the Green Belt.

- Area-wide improvements, informed by the Colne and Crane Valleys Green Infrastructure Strategy (including at Iver Environment Centre as part of a wider landscape-focussed approach)
- Area-wide management and maintenance, including a Countryside Management Service to operate in the areas of the Colne Valley Regional Park around the development.

Response Dated August 2021

Firstly we note that many of the issues regarding the need for the facility and Green Belt are being discussed at the Public Inquiry on Warren Farm MSA. It is vital therefore that no decision is taken until the appeal has been determined.

Secondly we note the intention to submit a separate full application for the mineral extraction (in July 2021). This will be determined at the same time, as each application is dependent on the other. This will further significantly delay this application's determination.

With regard to the additional information, although we still object fundamentally to the application, in particular the harm it causes to the loss of land from the twin designations of the Colne Valley Regional Park and the Green Belt, we welcome the attempt at addressing many of ours and other parties objections.

We note that the hotel has now been omitted; there is less parking and no drive thru facility. Hardstanding has been substantially reduced from 14.7 Ha to 10.9Ha and the building volume from 12,800 sqm to 5300 sqm.

We also note the significant increase in net gain to biodiversity to almost 52%, mainly through increasing the off site enhancement works. It should be recognised though that the proposed works including planting will take a considerable amount of time to establish. However as these are outside the red line a legal agreement will be required to deliver and hopefully maintain in perpetuity. However we are still concerned about the impact of the development on existing wildlife and woodland including the ancient woodland.

We welcome the more sympathetic approach to the watercourses but still object to building the slip roads on the flood plain . The flooding of the land this winter demonstrates how unsuitable any building work would be on this land.

No mention has been made regarding the considerable impact of the slip-roads on the operation of the Environment Centre adjacent to the site or recognition of the valuable work the centre does working with deprived children who would be severely affected by the development.

We also note the intention to increase the footpath network and create a route between Iver Heath and Uxbridge as suggested by us in our earlier response. However, a development on this scale should mitigate its impact on the green belt and Colne Valley Regional Park in a more strategic way. We refer the Local Authority and Developer to the call in our February 2021 submission for a Countryside Management Service to operate in the areas of the Colne Valley Regional Park around the development.

We would welcome the opportunity to discuss this with the applicants.

Response Dated February 2021

This application falls within the Colne Valley Regional Park (CVRP) and the Green Belt. Buckinghamshire Council and the former Chiltern and South Bucks Councils have been supporters of the CVRP since its inception. We hope the Council will continue to uphold the six objectives of the CVRP since this application represents the loss of farmland; the loss of 46 Ha of the CVRP and the Green Belt in a sensitive location; harm to recreational rights of way; harm to watercourses which run through the development, and the loss of, and harm to, existing grassland, woodland, hedgerows and their accompanying biodiversity.

- This response to the planning application also looks at the case for the Motorway Service Areas affecting the CVRP, including the one in this location
- The strategic planning context and the impact on the Green Belt
- The extent of the harm arising from the scheme and
- The scale of mitigation that should accompany the development if the very special circumstances' (VSC) were to be accepted by the decision maker (whether the Council or Secretary of State).

The case for an MSA in this location

This application for a motorway service area is one of three currently being considered by local authorities along the north-western edge of the M25. All the operators state that there is a need for an MSA on this stretch of motorway between the existing Cobham and South Mimms MSAs. This proposal is, however, less than eight miles from the existing Beaconsfield services on the M40, and is in the same district. How many other districts have two MSAs?

The application requires the Smart Motorway in this part of the M25 to go ahead. Due to several deaths on other parts of the network which have already become Smart Motorways, there must be some uncertainty as to whether this upgrade will go ahead.

The Circular which guides the provision of MSAs is out of date. It precedes the National Planning Policy Framework which gives considerable emphasis to environmental objectives; biodiversity protection; minimising waste and pollution; mitigating and adapting for climate change and moving to a low carbon economy. Does this proposed development for an MSA meet these requirements? Our argument is that it does not.

The government has committed to bringing all greenhouse gas emissions to net zero by 2050. All new cars will be electric within five years of this facility opening (2030). MSAs not only attract motorway users, but also those who see it as a destination either for food or

accommodation. Are these journeys necessary when facilities already exist nearby? Uxbridge Town Centre, for example, is a very short distance away, and, as stated above, the Beaconsfield MSA is less than eight miles away.

Is a surface level car park for more than 1,000 cars a good use of the land in a GB? A two-storey car park sunk into the landscape on half the land would have a lesser impact on the openness of the GB. Why does the hotel need to have three storeys? There are no three-storey buildings of this height anywhere nearby in the open countryside.

The provision of a large expanse of parking for HGVs seem at odds with government proposals for platooning lorries already approved by the UK government. Noise and light pollution will have an enormous impact on the quality of life for both humans and animals alike in this rural area. The location of HGV parking next to a large area of woodland will have a direct and significant negative impact. It will be in constant use 24hrs a day, with all the attendant light pollution and noise from engines, air conditioning units and human activity. Air quality will be worsened in this AQMA and Clean Air Zone for Iver Parish (something we note is not mentioned by the applicants). Additional HGV traffic during removal of winnable sand and gravel, and during construction, will negatively impact the local road network.

Strategic Planning Context

The beneficial side of the Green Belt and the CVRP's role in that Once GBs are defined, NPPF Para 141 calls on local planning authorities to "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."

The CVRP was established in 1965 with the support of a consortium of Local Authorities (including the predecessors of Buckinghamshire Council) to protect and improve this part of the Metropolitan GB, so partly fulfilling the Council's role as set out in Para 141. The CVRP's six objectives (set out in full in our website) effectively mirror Para 141 and how proposed developments 'perform' against those objectives is a relevant consideration.

It is now well established that the natural environment and recreation opportunities provided by the Green Belt offer a critically important physical and mental health resource for the wider population, as well as its obvious benefits to wildlife. The protection and enhancement of this resource for the long term is fundamental to the role of the CVRP. Once that resource is lost to development it is lost forever. This flags the importance of there being a scale of mitigation proportionate to the scale of the development and the harm that flows from it, something we explore below.

The particular sensitivity of this part of the Metropolitan Green Belt

The tests for assessing the potential acceptability of 'inappropriate' development in the GB may be the same wherever its location, but the spatial context of the part of GB in which the site is located must also be factored into decision-making. It should also inform the nature of mitigation if development is to be countenanced.

In the strategic Green Belt review undertaken by Arup and published by former South Bucks and Chiltern District Councils in 2018, this zone was categorised as part of the coherent 'London Fringe' zone. The report highlighted the characteristics and sensitivities of the part of that zone around the application site, referring to:

"... a strategic arc of open spaces separating the large built-up areas of Greater London and Slough, and smaller settlements such as Iver, Iver Heath"

"...a number of narrow bands of Green Belt are vitally important in preventing merging of settlements"

These gaps are essential in preventing the merging of the major urban settlements of Greater London (London Borough of Hillingdon) and the smaller settlements of Iver and Iver Heath. Any change or development in this area could act to significantly compromise the acknowledged role played by the Green Belt in maintaining separation between urban settlements.

This proposed development falls within the narrowest part of the Green Belt separating the urban areas of Uxbridge and Iver Heath, only 1.7km wide. The presence of the M25 and the existing electricity substation on the eastern side of the M25 narrows this important gap of undeveloped land further.

It is no coincidence that the extent of the CVRP significantly coincides with the 'London Fringe' zone – an area that needs particularly careful attention and planning. The Park provides an important area of countryside to the west of London.

To promote that careful attention and planning, the CVRP CIC collaborated with a number of other organisations, including the relevant local authorities, to produce the "Colne and Crane Green Infrastructure Strategy" during 2019. The Strategy provides useful guidance on how to address the many challenges facing the area. It is intended to be used alongside, and to inform Development Plans as well as to " ... inform both the design of development proposals and their comprehensive mitigation and planning obligations." It can be found here: <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-andcrane-valleys/>

It should also be noted that the impact on the CVRP and the Green Belt is not confined merely to this development but by other proposals nearby. Currently there is an application to extend Pinewood Studios on the western side of Iver Heath, and if implemented, it will mean further removal of a large area of Green Belt in favour of intensive – and in our view inappropriate – development. See plan overleaf. HS2 is taking a significant amount of land out of the GB and CVRP north of the M40 and as previously noted there is another proposal for an MSA on the western side of the M25 near the main HS2 construction site. To the south, the proposed expansion of Heathrow Airport will remove 1,300 acres of land from both the GB (900 acres of it directly from the CVRP). The strategic function of the GB in separating Greater London from smaller settlements in this western sector is being eroded by cumulative developments and will threaten the purposes of the Green Belt to the detriment of its fundamental function.

In terms of the impact on the openness of the Green Belt, consideration should be given to reducing the size of the sprawling car park and if necessary, halving its size and creating a two-storey car park sunk into the landscape. Thus, the overall site area can be reduced, and its impact on the openness of the countryside substantially mitigated.

The scale of land-take of 46 hectares is significant.

NPPF Para, 138 includes the following (our underlining):

“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

We argue that if the decision maker in this case is minded to accept the Very Special Circumstances for such a strategically significant development, it is incumbent on that decision maker to consider how to foster the beneficial role of the (remaining) GB as part of offsetting the harm associated with the development.

Notwithstanding that view, we are in no doubt that national and local planning policy require that, if approved, a wide approach to mitigation is necessary to offset the harmful impact and conflict with GB policy caused by the sheer scale and nature of this proposed development.

The CVRP plays a critical role in promoting the beneficial use of the GB in this area, hence its desire to be party to any mitigation package that would come into play if permission is granted.

Good planning must prevail and key issues relating to the beneficial future of the GB and CVRP not overlooked when an ad hoc planning application for such a major development is submitted.

The extent of the harm arising from the scheme

This development will have a significant impact on rights of way, loss of woodland, hedgerows and biodiversity. Replacement takes years and is likely to fundamentally damaged by the proximity of a noisy 24-hour facility as proposed. The visual impact will remain for a considerable period before the new planting matures, to the detriment of local residents and users of the countryside and, of course, it will be worse in winter. Security fencing will further harm connectivity for wildlife.

Paths Iver FP5 and Iver BW32 as they currently exist constitute the only north-south countryside recreational route in the immediate vicinity of Iver Heath. The proposed development would destroy it – the suggested diversions would be unattractive and unpleasant. The permissive right of way for pedestrians, cyclists and horse riders over the

motorway on the existing farm bridge is welcomed, since it would improve connectivity between Uxbridge and Iver Heath. There will, however, be uncertainty because of its permissive nature. A high-quality mitigation package of additional walking and cycling routes should be integral to the development. Use of the farm bridge could create a cycling and walking route stretching from Uxbridge towards Black and Langley Country Parks through the countryside.

There will be a reduction in air quality leading to nitrogen deposition adversely affecting the health of vegetation; 24-hour lighting and noise will cause harm to birds, bats and small mammals. The development will have an impact on biodiversity – Great Crested Newts and a range of other species such as Common Toads are located at Iver Environment centre immediately adjacent to the development.

Replacement of woodland and hedgerows is only as successful as its regular maintenance, and will require supervision and commitment to ensure its success. Many schemes such as this have failed due to inadequate watering and maintenance. This, together with factors such as reduction in air quality, noise and lighting, will make the promise to exceed the 10% biodiversity enhancement requirement difficult to fulfil.

Part of the Alderbourne catchment flows under the motorway west to east. On the eastern side of the motorway it is proposed to extend the culvert where the access slip roads will be built. In the current wetter winter conditions the stream has flooded most of this site. This is not an unusual occurrence. Culverting will exacerbate this flooding. The Environmental Statement reports concerns that the stream will also be vulnerable to pollution events from run-off, siltation and invasive species. It is good practice to avoid additional culverting, and buffers should be provided between the development and watercourses to avoid damage from run-off. The green roofs and commitment for on-site electricity generation through solar panels is welcomed. However, grey water recycling for toilet flushing and irrigation should be used together with other green measures and tools.

This application involves the loss of 46 Ha of productive farmland. This will have a significant impact on both the operation and viability of the existing farm.

The impact on Iver Environment centre alongside this development will also be severe. Potentially impacting their access road and their ability to run courses for children and adults with learning difficulties on this valuable community facility. The application does not recognise any impacts on this facility.

Buckinghamshire Council Environmental Health – Noise dated 26th May 2021

I have no objections to make on environmental noise grounds. This is largely because the site noise climate is dominated by the contribution from vehicle movements on the M25.

I've read through Chapter 7 of the noise and vibration report several times and broadly agree with the assessment (Summarised at Para 7.6.12 Table 7.29). Should likely significant adverse noise impacts be identified during the detailed design stage we would seek to mitigate them by recommending appropriate conditions. It is noted that construction

impacts will be controlled through a CEMP (Para 7.5.2), I would recommend that the Council be consulted on the production of this document with a view to at the very least agreeing core working hours.

The scale of mitigation needed

We summarise below the categories and general scope of mitigation needed, but these should be taken only as headlines. We have heeded the tests of mitigation being:

- a) Necessity to make the development acceptable in planning terms
- b) To ensure they are directly related to the development; and
- c) They are fairly and reasonably related in scale and kind to the development

The sheer scale of this scheme and its impact on the GB and CVRP means that mitigation must be commensurately significant and extensive.

But, before this comes into play and if the scheme is to proceed further, its layout must first be modified to create a 'greener', less intrusive, development reducing its impact on the openness of the GB.

The categories and scope set out below have, in part, been informed by the 2019 Colne and Crane Green Infrastructure Strategy – where this applies appropriate letters in Blue are included to cross-reference (found on pages 28-30 of the Strategy).

Area-wide Improvements to promote active travel and biodiversity

a) A blend of identified projects and a substantial fund (at least £2m) to be applied within 3km as the crow flies from the development.

b) Projects to include are ones aimed at - Improving active travel links, enhanced walking and cycling links in the local area including the Colne Valley Trail (A,MC101) - Reinstating a productive landscape (Y) in this area, - Farmland biodiversity enhancement (S) - Developing links with the education sector with links to the Iver Environment Centre adjacent to the eastern side of the site (Q, MC001) - Water quality and river habitat improvements (L, LN, MC201)

Area Wide Management and Maintenance

c) An annual fund of £25k for 25 years from commencement of the development, to fund a CVRP Countryside Management Service (P, R, X), to care for the area around the site whilst fostering community engagement. For example, on land outside the red line including woodland and ancient woodland mentioned in the application where enhancement measures are proposed.

d) This could link to a 'green team' to add an employment/training angle (Q) and deliver on other objectives e.g. Biodiversity and link with partner organisations (such as Black Park, Iver Parish). It would assist with the improvement of road corridors to retain and re-create the countryside feel (Z).

Biodiversity Net Gain of in excess of 10%

e) Details as agreed with the Council's Ecology Officer

Conclusion

The CVRP fundamentally objects to this application on the basis of the considerable harm it would cause to this part of the Green Belt and the Colne Valley Regional Park. It considers the cumulative impact of this and other schemes will have a detrimental impact on the strategic Green Belt at the narrowest part of the designation, harming its very purpose.

The CVRP questions the rationale of locating the development in this highly sensitive area.

The CVRP questions whether the application meets the NPPF requirements and those of Climate Change legislation.

The CVRP notes this is one of three current proposals for MSAs in this quadrant of the M25. If this development is approved, it will petition to have the applications called in by the Secretary of State for decision.

The CVRP objects to the loss of productive farmland, and the harm caused by the loss of significant amounts of woodland and hedgerows to local biodiversity.

If approved, the scale of mitigation required for this MSA would be far in excess of what is proposed in the planning application.

All these issues indicate this is the wrong development in the wrong place.

Buckinghamshire Council Environmental Health – Contaminated Land dated 29th July 2022

I have reviewed the addendum to Chapter 11.0 Ground Conditions of the ES and the additional information that has been submitted.

I have no further comments to make with regards to land contamination.

A ground investigation should be undertaken prior to the commencement of the development

Buckinghamshire Council Environmental Health – Air Quality dated 18th February 2021

With reference to the Air Quality section of the Environmental Statement submitted as part of the planning application outlined above, I have the following comments to make

1. There is a dedicated and controlled means of access via the A4007 (Slough Road) for staff and emergency access to the MSA from Local Road Network in the plan. The Strategic Environment Team supports Highways England's request to place a physical barrier between the staff side of the MSA and areas where members of the public can enter. In HE's experience although the means of access to the MSA from local road network is controlled it is still open to abuse and is often used as an easier access on to the Strategic Road Network from the Local Road Network.

2. It is understood that permission has not yet been given by Highways England to build haul routes to enable all construction traffic to access the site from the M25. Should permission not be provided the possible impact of construction traffic on local roads should be revisited.

3. The following diffusion tube monitoring locations were found on the map but not mentioned in table 8.7: Nearby NO₂ Diffusion Tube Monitoring Locations. Diffusion tubes located further away from the MSA have been included. a. 28/29 Outside the Swan Pub Iver 503899 181199 b. 30/21 6 Thorney Lane North 503924 181127

4. To evaluate model performance and uncertainty, the Root Mean Square Error (RMSE) for the observed vs predicted NO₂ annual mean concentrations is calculated, as detailed in Technical Guidance LAQM.TG(16). There is no reference to a RMSE in the assessment.

5. There are concerns about the potential air quality impacts of cumulative developments in the Ivers as many individual schemes, deemed insignificant in themselves, are potentially contributing to a "creeping baseline". There is a concern that in combination the emissions of local planning developments and the National Infrastructure Projects could result in a significant increase in NO₂ concentrations in Iver and also contribute towards an increase in particulate matter. The Air Quality Action Plan for the Iver contains a number of measures that should reduce NO₂ concentrations in Iver Parish. The council are requesting a financial contribution from all developments that increase concentrations within the Iver area regardless of magnitude to offset the increase and prevent baseline creep.
Buckinghamshire Council Ecology dated

Buckinghamshire Council Economic Development – dated 31st March 2021

Strategic Fit

It is good to see reference made to the strategies of the Local Enterprise Partnership, although as the most up-to-date documents, it is surprising that more emphasis is not placed on the Local Industrial Strategy and the Economic Recovery Plan rather than the Strategic Economic Plan.

Disappointingly, it has not been clearly articulated how this proposal will support the priorities in the three strategies identified. For example, reference is made to the priorities around skills and talent and the need for collaboration between education and employers. It is not clear though from the information that follows how this application would support the development of skills.

Local Economic Benefits

Quite a detailed explanation is given as to the types of economic benefits that such applications can bring, the methodology applied and the existing economic baseline. How they have arrived at their “study area” through assessing travel to work patterns is logical but in including Hillingdon and Slough, there is not a clear picture of the benefits this proposal will bring to Buckinghamshire. As such, when the benefits to the study area are referenced, it needs to be kept in mind that these are benefits for Slough and Hillingdon too, and not just South Bucks.

It is disappointing that the level of detail, particularly on the economic baseline, is not matched by the same level of detail on how the local benefits could be maximised.

Paragraph 12.4.3 states that “a maximum of approximately 300 people are likely to be employed in construction, with up to approximately 250 people likely to be on Site at any one time”.

Paragraph 12.4.5 then makes reference to 552-553 jobs being supported, generating approximately £29.2 million in GVA. Clarity on the number of jobs to be created in the construction phase is therefore required.

Paragraph 12.4.6 includes some encouraging statements around local procurement and local employment. There is no indication though of any efforts to be made to ensure either. Likewise, paragraph 12.4.8 states “The effects, which would be temporary, could be significant for individual businesses and workers, particularly for those based locally. Additionally, the generation of construction activity and employment associated with the Proposed Development has the potential to lead to further opportunities for both businesses and individual workers, due to the development of skills and experience.” The use of the words *could* and *potential* imply there are no guarantees that such benefits will be felt locally.

Paragraph 12.4.10 refers to non-local workers who require accommodation close to the site. The availability of local, affordable accommodation may be a challenge in South Bucks and therefore it is questionable how much of this benefit will be felt in the local area. It is also acknowledged in the report itself that many of the benefits will be felt outside of the study area.

In the operational phase, it is estimated that in the first year after opening, 311 FTE jobs would be created. This figure would rise to approximately 453 FTE jobs by the

third year after opening and when operating at full capacity. As a number of the jobs will be part time, the total number of workforce jobs will be higher than these figures (estimated at 552-553).

The creation of employment, particularly in light of the COVID-19 pandemic, is to be welcomed. Traditionally, South Bucks has been a district of relatively low unemployment and high levels of skills and qualifications. It is therefore welcoming to see that approximately 25% of employment is anticipated to be in managerial and senior official, professional occupations or associate professional and technical roles. Some of the sales and customer service roles may be beneficial for those affected by changes to town centres and the impact on retail employment.

However, based on commuting patterns, it is estimated that over 46% of the employment would be taken by individuals outside of the study area. Based on total workforce jobs of 552, this equates to around 300 jobs being filled by those in the study area. However, the study area includes areas outside of Buckinghamshire and so only a proportion of the 300 will actually be filled by residents of South Bucks.

Paragraph 12.5.1 makes reference to the increased employment and GVA associated with the proposed expansion of Pinewood. The benefits of Pinewood are separate to those resulting from the MSA application. It is unclear from the socio-economic information how the two schemes are linked.

Section 12.6 touches upon local recruitment and local procurement and outlines some of the measures that can be taken to enhance local benefit. Whilst there are some encouraging suggestions, this section would benefit from further detail and I would suggest that the applicant is asked to provide more information on the efforts to be undertaken to maximise local benefit. Ideally, in addition to reference to local recruitment, it would be good to see reference to apprenticeships, links with schools, work experience, progression opportunities, links with other employment support schemes, links with other construction/infrastructure projects for those completing their time on the build; tendering information for local businesses, and so forth. This could be articulated in an employment and skills plan and local procurement plan which would also strengthen the economic argument for the proposal.

In addition, and this may be covered in other information submitted by the applicant, the accessibility of the site for employees, needs to be considered and methods to ensure accessibility by a range of means across a range of potential shift patterns, should be articulated.

Summary

To summarise, from an economic development perspective, investment in the area and the creation of employment is to be welcomed. Whilst the socio-economic information provided gives an overall indication of the expected benefits, more detail is required on the efforts that will be undertaken to maximise the benefits to Buckinghamshire residents and

Buckinghamshire based businesses. The submission of an employment and skills plan and a local procurement plan, including local targets as appropriate, should be encouraged.

National Planning Casework Unit dated 14 January 2021

I acknowledge receipt of your email and the environmental statement relating to the above proposal. I confirm that we have no comments to make on the environmental statement.

Affinity Water dated 18 February 2021

Thank you for consulting Affinity Water on this application. We have no substantive comments to make. The development will likely mean a number of changes to our services here and we would ask that the developer engages with our Developer Services section as soon as possible. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com.

Thames Water dated 13 June 2022

Waste Comments

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection

to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.