

APPENDIX B : Representations

Representations

Amenity Societies/Residents Associations

British Horse Society (dated 16th June 2022)

I am responding on behalf of THE BRITISH HORSE SOCIETY (BHS), the largest equestrian charity in the UK which protects and promotes the interests of horses and the 3.5 million people in the UK who ride or drive a horse-drawn carriage.

The BHS is neutral to this Outline proposal but wishes to draw the Authority's attention to the significant impact that the development would have on the many riders who keep their horses nearby and regularly ride Bridleway IVE/32, which crosses the development site. We have consulted with local horse riders and have the following concerns:

1. Diversion of IVE/32 This bridleway is a wide and well-made track that provides a critical link in the local off-road riding network, connecting several livery yards and private stables south of the A4007 to the wider network and to Black Park Country Park via Sevenhills Road. The open character of the route is appreciated by local riders, having no overhanging trees and being wide enough to ride two abreast. This is relatively unusual in this area, and particularly valued by those escorting children and other novices, who need ideally to ride side-by-side with an experienced rider. The application proposes to divert Bridleway IVE/32 from its route along the east side of the site to the western perimeter, through a belt of planting proposed "...to soften/screen the visual impact of the MSA from surrounding views." (DAS p. 27) This represents a substantial change in the character of the route. It also has implications for the layout and future maintenance of the path as the vegetation will need regular cutting (a) to keep the full width of the track open for use and (b) to keep the surface dry enough to stand up to year-round use as the planting matures (and thus reduces the drying effects of direct sunlight and air movement on the track).

Specifically:

a) For the comfort and safety of all users passing other horses, pedestrians, children, dogs or cyclists, the USEABLE WIDTH of the diversion route should be at least 3 metres over a sound surface all year round (see BHS guidance on Diverting a Bridleway on our website at www.bhs.org.uk/accessadvice). For a route enclosed by vegetation (and shared with walkers and cyclists, including MSA staff walking or cycling to work) we advise a minimum of 5 metres.

b) The SURFACE must be suitable for horses. Tarmac or similar sealed surface should on no account be used on a bridleway as it is often dangerously slippery to horses. The applicant should refer to BHS guidance on Surfaces (see www.bhs.org.uk/accessadvice) in preparing detailed specifications for this path.

c) The DIVERSION ORDER must be legally completed, and the new route established and open to the public, BEFORE the existing line of IVE/32 is closed, to ensure uninterrupted access for walkers, riders and cyclists throughout the implementation of this development. These matters require prior approval of Buckinghamshire Council RoW team, as the Highway Authority for Public Rights of Way.

2. Road safety

Horse riders currently must ride along and across the Slough Road/A4007 between the south end of IVE/32 and IVE/33, to the south of the A4007. At the north end of IVE/32 they cross the A412 to gain access to Sevenhills Road. Recent traffic flows on these are not necessarily representative due to lockdown, nonetheless both are currently busy main roads. The BHS is particularly concerned about the increased risk to riders from HGV movements during the proposed mineral extraction, backfilling and construction of the MSA. We also believe that after completion of the development - regardless of the proposed staff transport scheme - there will continue to be higher levels of traffic in and around the immediate area of the MSA. Provision must therefore be made to ensure that walkers, horse riders and cyclists using IVE/32 can cross these roads safely, preferably by means of controlled Pegasus crossings on both the A4007 and the A412. There also needs to be clarity about alignment of the A4007 crossing point relative to the staff access road to the site, to ensure safe access to and from IVE/32 for walkers, riders and cyclists.

3. Sliproad to MSA from M25 northbound

To the south of the A4007, Bridleway IVE/33 runs close alongside the M25 through to Coppins Lane, Love Green Lane and Langley Park/Bridleway WEX25 via IVE/11. Described by one local rider as "A vital part of a circular route around the Ivers that keeps equestrians off the increasingly busy main roads", this bridleway would be substantially affected by the proposed slip-road to the MSA from the M25 northbound carriageway. This does not appear to have been identified or addressed within the current plans.

Conclusion

This proposal would have substantial adverse impact on the local bridleway network which has not been addressed in the current Outline application. Any Full planning application for this development must include detailed specifications and plans for:

- a) Design and implementation of the diversion route for bridleway IVD/32, including alignment, width, surfaces, signage, timescales and phasing of the Diversion Order.
- b) Provision for ongoing maintenance of the path, given that it will be enclosed by vegetation.
- c) Safe pedestrian/horse/cycle crossing of the A4007 between IVE/32 and IVE/33 - showing how the diverted line of the bridleway is aligned relative to the proposed staff access road.
- d) Safe pedestrian/horse/cycle crossing where IVE/32 crosses the A412.
- e) Diversion of IVE/33 to accommodate the northbound slip road on the new junction. The BHS is happy to discuss any of the points above with the Authority and/or the applicant.

PLEASE NOTE that the BHS is a Statutory consultee for Public Path Orders, including Diversion of Rights of Way. The Society should be notified of all future consultations regarding this proposal.

Iver Environment Centre (dated 16th June 2022)

Having reviewed the updated documents I would like to reiterate that on behalf of Iver Environment Centre, situated directly next to the site, in the heart of Colne Valley Regional

Park, I strongly oppose this inappropriate development of green belt land. All of the previous comments we made on the planning application still stand and I would like to draw attention to the fact that despite being informed of factual inaccuracies in their ecology report no effort has been made to correct these inaccuracies or clarify the design of the boundary abutting our premises as requested.

Since the initial planning application was submitted Great Crested Newt Surveys have been carried out (funded by the substation, so completely independent of and unrelated to this planning application) which provide up to date evidence of the continued existence of Great Crested Newt on our site next door to Mansfield Farm. It's hard to see why records and GCN licences have been disregarded in volume 6.

We are seriously concerned by the ecological damage that the development will have on this area through habitat destruction, watercourse culverting, light pollution, air pollution and noise pollution. We have no confidence in the conclusions stated in the ecologists report. We do not agree that stated mitigation measures approach the level required for a development of this nature.

We would also like to reiterate the devastating impact that this development will have on the existence and operations of Iver Environment Centre. Iver Environment Centre (formerly Iver Nature Study Centre) is a community resource that has been connecting local residents, and those from built up areas in London and Slough, to nature for over thirty years. We enhance the beneficial use of green belt land not only through providing opportunities for people to spend time outdoors, but also through maintaining and enhancing biodiversity. Since the initial planning application we have continued to do that through creating meadows, refurbishing ponds and engaging volunteers in diverse planting projects across our site. The slip road next to our entrance is a significant threat to us.

We teach right by our gate. The noise pollution will make that really difficult. The air pollution of constant cars coming right up to our site will disproportionately affect our audience; comprising of children with developing lungs, elderly people and people who have disabilities which make them especially vulnerable to breathing issues. The general experience of our visitors will be negatively affected as we lose the open outlook they seek when visiting the Colne Valley Regional Park. The biodiversity found on site will decrease as wildlife corridors are destroyed as well as due to around the clock pollution. The viability of the centre will be challenged as our audience will be severely limited when a slip road is built on fields which are our only option for overflow parking (albeit a seasonal option due to regular flooding in these fields - contrary to what is incorrectly stated in the application).

It is an unnecessary and inappropriate development.

Response dated: 07 July 2021

The updated ecological report states "With respect to great crested newts, the ecologist undertaking the water vole survey visited Iver Environment Centre in May 2021 and discussed the egg record with staff. No further corroborative evidence exists of larvae or

adult newts from the pond, and no other ponds have been identified within 500m of the boundary of the Proposed Development.”

The unannounced visit involved the ecologist speaking to the only person onsite at the time - a junior member of staff who said that they didn't know about newts and that the ecologist needed to speak to the Centre Manager. The ecologist did not contact the Centre Manager. Attached is an eDNA report confirming presence of GCN in ponds onsite. I would recommend that another survey is carried out now that the main pond restoration is complete and that more details are submitted on the boundary between the slip road and the Environment Centre. Unfortunately this isn't the best time of year for GCN surveys.

I would also like it noted that there are in fact four external ponds on site (within 500m of the proposed MSA site) as well as another in a polytunnel. A cursory look at the site would have revealed that fact as two are abutting the car park.

In addition to the above I would like to share my disappointment that despite submitting new plans for habitat enhancement works there has been no mention of mitigation for the detrimental effect the development will have on Iver Environment Centre - a key local community resource which actively manages a variety of habitats as well as connecting people to nature. I note that despite feeding back into the initial planning application there has still been no effort from the planners to open a dialogue with us (excluding the ad hoc visit from the ecologist whilst he was nearby).

Response dated: 11 February 2021

I am the centre manager of Iver Environment Centre, a partnership between National Grid and Groundwork South Trust. We have been based here for 30 years and are located between Mansfield Farm and the substation - adjoining the proposed development site. Each year we connect around 10000 people with nature including schoolchildren, families, and volunteers. We have a longstanding history of working effectively with adults with learning disabilities. We strongly oppose the development due to the threat it will cause to the successful function of our Environmental Education Centre as well as the damage it will cause to the local natural environment.

We have written a response to the planning application. This statement can be found on our website www.IverEnvironmentCentre.org and we have emailed it to planning.comments.csb@buckinghamshire.gov.uk

Our main points are

- We as one of the nearest neighbours, whose purpose is connecting people to the environment should have been contacted and involved in the consultation.
- The noise pollution, especially from the slip road in the fields by our front gate will interfere with speaking to visitors outside.
- The increased air pollution as a result of the development is unacceptable for a place where children are coming to spend time outdoors.
- The increased air, noise and light pollution will have a detrimental effect on biodiversity, which will have a knock-on effect on the experience of our centre users.

- There is a security risk to our site from a 24-hour service station and bringing the slip road close to our gates is a safety issue, especially for adults with learning disabilities who may run when scared.
- It removes our only option for overflow parking, limiting our ability to hold fundraising or larger public engagement events here, threatening our continued success.
- The first stage works may threaten our sole access route.
- The slip roads are being built on an area that experiences seasonal flooding and their proposal to culvert the Alderbourne increases flood risk further as well as destroying the habitat.
- The land they are proposing to build on is part of Colne Valley Regional Park and the Green Belt. Developing countryside is against the objectives of the CVRP and Green Belt land is only to be built on in exceptional circumstances.
- This area of Green Belt is particularly fragile due to its narrow nature and other developments on it. It will not be able to fulfil its function of preventing urban sprawl and stopping Iver heath being subsumed by surrounding settlements.
- The National Planning Policy Framework does not support development on sensitive Green Belt land.
- There is not a need for a service station as there is one 8 miles away in Beaconsfield and the services of Uxbridge are only 8 minutes' drive (5 miles) via J16 from that part of the M25. It may lower the safety of that section of motorway due to weaving near a junction.
- Additional service stations do not fit with the government commitments to change the way we travel.
- The ecology report appears superficial and omits the presence of Great Crested Newts on our site.
- We do not have confidence in their stated mitigation measure and do not believe that it will result in a 10% gain in biodiversity as asserted by the developers.

Campaign to Protect Rural England (CPRE)

We are writing to object to the above referenced Outline Application for a Motorway Service Area between M25 junctions 15 and 16 near Iver Heath with all matters reserved.

The Buckinghamshire branch of CPRE, The Countryside Charity, as a long standing charity, has a role to protect the countryside from developments that do not meet acceptable planning guidelines. We would like to register CPRE Bucks' opposition to the above planning application for the reasons below:

1. The site is in the London Metropolitan Green Belt
2. The site is also within the Colne Valley Regional Park
3. It is not necessary.

We deal with these principal points below:

The site is in the London Metropolitan Green Belt

This site is within the London Metropolitan Green Belt. The fundamental aim of Green Belt policy is to “prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (Para 133 of the NPPF). This area of land is characterised by its openness and obviously cannot be permanent if applications such as this are granted. And, because there is no up to date Local Plan for South Bucks (Para 11 d)), Paragraph 11) d) i applies: “the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”. In this case, it is Green Belt land so refusal would be in line with the NPPF.

The site is also within the Colne Valley Regional Park

The Colne Valley Park CIC exists to maintain and enhance the Colne Valley as the first taste of countryside to the west of London for the benefit of more than three million people who live within ten miles of the Park. The Park has six stated objectives (see https://www.colnevalleypark.org.uk/whats_special/#:~:text=The%20Colne%20Valley%20Park%20will,for%20recreational%20and%20cultural%20pursuits). The whole of this application site is within the Regional Park.

This proposed development would result in:

- Landscape and countryside impact in conflict with objectives 1 & 2.
- Impact on the attractiveness and setting of the footpath and bridleway that cross the site (presumably requiring them to be re-routed as well) in conflict with objectives 4 and 6.
- The loss of productive agricultural land in conflict with objective 5 and the loss of potential habitat for farmland wildlife in conflict with objective 3.

It is not necessary

We would point out that there are other proposals for service areas on the west side of the M25: Extra wants to build on a site off the M25 between junctions 16 and 17, while Moto have submitted plans for a service station off the A41 between Hunton Bridge and Kings Langley, close to junction 20. With reference to the Extra site, Application PL/19/2260/OA is for another motorway service area just a mile or two north of this site. It was submitted back in 2019 and expired – without a decision as far as we can see – just a few months ago (October 2020). We are not clear what the status of that now is. There were a considerable number of objections to that site which are equally relevant there. We would therefore request that, to save everyone’s time and effort, you fully assimilate all the objections to that proposal and discuss with your neighbouring local authorities to arrive at a properly considered, strategic proposal.

But we would strongly suggest that a more strategic approach is needed to where service areas are located as we are in danger of having THREE service areas within a few miles of each other. Clearly that is absurd. We respectfully suggest that NO applications; either in Bucks or Herts, are considered until a strategy has been developed.

But perhaps even more significantly, the future of road transport, and cars in particular, is undergoing a massive change. The advent of electric cars and driverless cars is almost upon us and we believe this requires a fundamental re-think of transport strategy. In these circumstances, the need for yet another motorway service area needs to be re-considered.

We therefore strongly object to this application and urge the Council to refuse it.

Wildlife Trust (dated 11th February 2021)

We have the following comments on behalf of the Berks, Bucks and Oxon Wildlife Trust. As a wildlife conservation charity our comments refer specifically to impacts on the natural environment which may occur as a result of the proposed development.

BBOWT objects to this application on the following grounds:

- Lighting impact on the woodland to the north; a priority habitat with potential for protected species; bats.
- Culverting of the Alder Bourne watercourse

Light pollution of Woodland and Impact on Bats

The woodland to the north of the site is of priority for nature conservation as identified in section 41 of the NERC Act (2006). The Local Planning Authority has a duty to conserve these habitats in their decision making.

In addition to being a priority habitat, the woodland contains a number of trees along the southern edge which have moderate or high potential to support roosting bats. Emergence/reentry surveys have not been submitted in support of the planning application to evidence whether bats are currently roosting in these trees. A relatively high level of bat activity was recorded along this woodland edge, indicating that the woodland is used for foraging and commuting by a number of different bat species.

The raised ground level and close placement of the HGV park means that the woodland edge will be subject to light pollution, in places the increase will be more than 3 lux. Many bats will avoid areas with more than 1 lux of light spill.

We therefore recommend that the MSA is redesigned to avoid this negative impact on the woodland habitat by the addition of a planted tree belt along the northern edge of the HGV area, at the same ground level as the HGV area, to help limit the light pollution to the woodland edge.

Culverting of Watercourses

The proposed development will lead to the culverting of additional sections of the Alder Bourne watercourse. The watercourse is a priority habitat for conservation and culverting this section is both a direct loss of habitat and negatively impacts the ecological connectivity of the landscape

Woodland Trust (dated 21 August 2021)

Objection – loss, damage and deterioration of veteran trees

The Woodland Trust is the UK's leading woodland conservation charity. The Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

We object to this application on the basis of loss, damage and deterioration of veteran trees, as well as other notable and over-mature trees. We are concerned about the following trees detailed within the applicant's various arboricultural reports.

Tree no.	Species	WT	Categorisation Status
T4	Oak	Veteran	Damage
T11	Oak	Notable	Loss
T12	Oak	Veteran	Loss
T60	Oak	Veteran	Loss
T65	Oak	Veteran	Damage
G6	Alder	Veteran	Damage

Ancient and Veteran Trees

There are a number of trees on this site that we consider to be veteran specimens and are likely to be affected by the proposals with varying degrees of loss, damage and deterioration. While these trees aren't identified on the Trust's Ancient Tree Inventory (this inventory is not a comprehensive record of all ancient and veteran trees in the UK), the sizes and recorded features are indicative of veteran trees. The status of these trees is also supported within Sylvan Consulting's report submitted by Pegasus Group.

Planning Policy Guidance (PPG) for the 'Natural environment', which is intended to clarify and interpret the NPPF, and was updated on 21st July 2019, states¹ : "Veteran trees may not be very old but exhibit decay features such as branch death or hollowing. Trees become ancient or veteran because of their age, size or condition. Not all of these three characteristics are needed to make a tree ancient or veteran as the characteristics will vary from species to species."

Natural England's standing advice for ancient woodland, ancient trees and veteran trees² states: "Ancient and veteran trees can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are irreplaceable habitats with some or all of the following characteristics."

"An ancient tree is exceptionally valuable for its: great age, size, condition, biodiversity value as a result of significant wood decay habitat created from the ageing process, and cultural and heritage value." It states further: "All ancient trees are veteran trees, but not all veteran trees are ancient. A veteran tree may not be very old, but it has decay features, such as

branch death and hollowing. These features contribute to its biodiversity, cultural and heritage value.”

Veteran features are not necessarily a product of tree age or size; they also develop as a result of a tree’s life or environment. This is particularly emphasised within the PPG, in which the key characteristics of size, age or condition are considered separately. A key function of the term ‘veteran’ is to capture trees that have exceptional habitat value as well as those with cultural and heritage value. The term is not a true ecological grouping, and serves to help us to identify trees which are important for biodiversity in their own right, and as part of a wider assemblage; veteran trees are important for the accumulation of features that are unable to be replicated within our lifetime. Identifying and evaluating veteran features requires the application of knowledge, experience and judgement. We acknowledge that government definitions do not provide precise, measurable parameters against which to easily recognise veteran trees. However, Natural England’s standing advice, planning policy guidance, and expert reference texts do provide clear instruction that tree girth should not be used as the main qualifier for veteran classification.

Planning Policy National Planning Policy Framework (NPPF), paragraph 175 states: “When determining planning applications, local planning authorities should apply the following principles:

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;”

Exceptional reasons are defined in Footnote 58 as follows: “For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”

We consider that the impact of the development on veteran trees does not fit these criteria and should be refused on the grounds it does not comply with national planning policy.

‘Core Policy 9: Natural Environment’ of the Core Strategy in Buckinghamshire Council’s South Bucks Area Development Plan should also be considered. It states: “More generally, the landscape characteristics and biodiversity resources within South Bucks will be conserved and enhanced by:

- Not permitting new development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided, resulting in a net gain in Biodiversity.
- Seeking the conservation, enhancement and net gain in local biodiversity resources within the Biodiversity Opportunity Areas, on other non-designated land, on rivers and their associated habitats, and as part of development proposals.’

Impacts on Veteran Trees Ancient and veteran trees are a vital and treasured part of the UK's natural and cultural landscape, representing a resource of great international significance. The number of veteran, notable and over-mature trees on this site holds significance for local biodiversity. The existing values will not be sustained if the site is developed as proposed. We consider that there would be loss and deterioration of existing veteran trees and it will not be possible to provide for the continuity of appropriate trees that could become veterans of the future. In respect of the specific trees affected, we hold concerns for trees T4, T11, T12, T60, T65, as well as a collection of veteran trees within group G6 (as detailed in the table above). While the Trust has not undertaken any site-based assessments of such trees, using information provided within the applicant's various arboricultural documents and the findings presented in Sylvan Consulting's submitted report we have assessed that the listed trees fall within the category of veteran (other than T11 which we would consider is likely to be notable) and must therefore be treated as such. The loss of trees T11, T12, T60 and trees within G6 is unacceptable and the proposed management methods and unsuitable protections afforded to trees T4, T65 and G6 would lead to inappropriate and avoidable deterioration of the trees and their habitat value.

Unfortunately, the applicant has not recognised many of these trees as veterans and therefore pushed forward with designs that would either result in their loss or continued deterioration through inappropriate buffer zones/management. While loss must be avoided, affording suitable space for the maintenance of a tree's vitality is also of great importance to ensure a tree's continued survival. To this end, Natural England's standing advice for veteran trees must be considered; this guidance states that veteran trees should be afforded a buffer zone of 15 times the stem diameter or 5m beyond the crown, whichever is greater.

Trees can be vulnerable to the changes caused by nearby construction/development activity. Development within the RPAs and/or canopy of ancient and veteran trees can result in adverse impacts as the tree's root system is adversely affected by soil compaction and direct root damage. The potential direct and indirect impacts of development on ancient and veteran trees are clarified in Natural England's standing advice, including:

- damaging roots and understorey (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- increasing the amount of pollution, including dust
- increasing disturbance to wildlife from additional traffic and visitors

Furthermore, new development close to such trees increases the targets and risks associated with people and property in proximity to them, thereby compromising their long-term retention.

The British Standards guidelines 'Trees in relation to design, demolition and construction (BS5837:2012)' clarify that construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction works. Root systems, stems and canopies, all need allowance for future growth and movement, and should be taken

into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard. However, it is important to also consider the guidance within Natural England's standing advice when specifically taking the protection of ancient and veteran trees into consideration. This standing advice identifies mitigation measures that can be implemented where nearby development may result in impacts on ancient and veteran trees, including:

- “putting up screening barriers to protect woodland or veteran trees from dust and pollution
- a buffer zone at least 15 times larger than the diameter of the tree, or 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter
- protecting veteran trees by designing open space around them
- identifying and protecting trees that could become veteran trees in the future”

The need to ensure that ancient and veteran trees are afforded appropriate space for their long-term health is supported by the BS5837 guidelines which states in paragraph 5.2.4 that “particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development” and that “adequate space should be allowed for their long-term physical retention and future maintenance”.

Veteran trees typically feature significant deadwood habitat of great value for biodiversity, e.g. retained deadwood in the crown, broken/fractured branches and trunk cavities/wounds. The level and type of usage of such a high density residential development will increase the health and safety risks associated with these trees leading to a requirement to manage them more intensively resulting in loss of habitat and/or consequential decline or removal.

Our concerns regarding the increased risk that veteran trees can pose when more exposed to human contact is supported by the guidance within David Lonsdale's 'Ancient and other Veteran Trees: Further Guidance on Management' (2013), which states in paragraph 3.5.2.1 “...avoid creating new or increased targets: as happens for example following the construction of facilities (e.g. car parks or buildings) which will bring people or property into a high risk zone. Not only does this create targets, it also harms trees and therefore makes them more hazardous”.

The Trust requests that the council's tree officer and planning officer take our comments and government guidance into consideration and ensures that the applicant is avoiding loss of any veteran trees and applying suitable buffers to retained veterans. Where development encroaches on the RPAs of these trees the layout of the development should be altered to prevent such impacts. If this is not possible then the proposals should be refused planning permission as the loss of trees and encroachment and subsequent impact of the development on the trees' root systems would directly contravene local and national planning policy and government guidance.

The significant concentration of veteran, notable and other over-mature trees displaying important habitat features within the development site means that the loss and damage of such trees would ultimately lead to a reduction in the available habitat for species reliant on

dead and decaying wood habitat, i.e. saproxylic invertebrates, bats and certain species of birds. In its current form the development would result in damage to a number of veteran trees on the site, which would be highly deleterious to the wider environment of mature and veteran trees that may harbour rare and important species.

Conclusion

Ancient and veteran trees are irreplaceable; the habitat that they provided cannot be re-created. Development resulting in the damage or long-term deterioration of such trees is unacceptable and contrary to national and local planning policy.

In summary, the Woodland Trust objects to this application on the basis of damage and deterioration of several veteran trees.

While the applicant has recognised some trees on site as being veteran and/or having veteran features, we do not consider that they have fully recognised the qualities and importance of all the trees on site and appropriately categorised them as veterans. As such, a number of trees have not been afforded the suitable RPA that their veteran status warrants or are due to be removed despite our assessment of them as veteran specimens. As such, we consider that this application should be rejected in its current form.

Chiltern Society dated 23rd April 2021

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

The application site is located in the Green Belt, but just outside the Chiltern Society boundary. As it is beyond our normal geographical area of concern, we don't intend to submit any detailed comments on this application.

However, we are aware that there are 3 separate applications on this stretch of motorway with the one at Chalfont St Peter going to appeal and the one at Kings Langley to be determined by Three Rivers. We have been in touch with MHCLG to request a call in for all 3 applications, so that they can be considered together. Given that all the sites would have a significant impact on the Green Belt, it is essential that no more than one is approved and that very special circumstances can be clearly demonstrated.

However, now the application at J16 and 17 has been appealed, we are requesting that this is recovered by the Secretary of State and considered alongside the other applications. It is only by considering all 3 applications together that an informed decision can be made on the need for a new service station, and if so, which of the three sites would have least impact on the Green Belt and the surrounding landscape.

We, therefore, object to the determination of this application unless and until all three applications have been assessed together and an agreement reached on the best option.

Should the Iver Heath site be chosen, we would expect significant landscape enhancement and biodiversity net gain to form linkages with other habitats to form an ecological network in the surrounding area and linking into the Chilterns.

Representations on behalf of Extra (CSP1 & CSP2)

15th April 2021, 10th July 2021, 26th July 2021, 19th August 2021, 15th September 2021, 23rd September 2022 and 7th November 2022

Summary of representations:

- Details of proposed access have been reserved. Absence of such fundamental detail in this location is improper considering the scale and nature of proposal
- The application is not supported by a flood risk sequential test
- Methodology of Alternative Sites is flawed and does not take into account wider sites beyond that of Junctions 15 and 16
- Significant impacts on the Iver Environment Centre
- Subsidiary access is contrary to the DFT circular 02/2013
- Formal EIA Scoping process has not been carried out
- M25 improvement works should be seen in combination with the proposed development
- Future baselines are not sufficiently defined in terms of the ES
- Insufficient topic based information in relation to Minerals, Traffic, Transport and Access, Ecology, Drainage and Flood Risk
- Insufficient pre-application engagement
- Loss of four veteran trees
- Loss of an area of ancient woodland
- Significant harm to biodiversity impacts on the River Alderbourne
- MSA and access do not fall within the definition of 'essential infrastructure' in terms of flood risk vulnerability
- Proposals would require several departures from standards.
- No impacts carried out on the M25 and Smart Motorway infrastructure
- Flaws in the Flood Sequential Test.
- Concerns regarding impact on traffic flows, motorway infrastructure, mining and minerals traffic and timelines for construction.

Other Representations

125 third party or local representations have been received, which includes some instances where the same contributor has submitted more than one representation, and /or where more than one representation has been received from the same address. The grounds of objection are summarised as follows:

Green Belt

- Loss of green space buffer surrounding Iver Heath
- Loss of valued Green Belt land
- Inappropriate development in the Green Belt
- Loss of the green buffer between Iver Heath and Uxbridge
- Erosion of the Green Belt
- Iver Heath has already been subject to Green Belt destruction
- Cumulative impact on Green Belt as a result of large scale development in the area
- Buckinghamshire Council should be committed to retain Green Belt land
- NPPF does not support development on sensitive Green Belt land
- Green Belt should be a safety net against incursion of surrounding countryside
- The Ivers is losing much of its Green Belt land
- Developments on Green Belt area have to be clearly necessary and other avenues have to be explored. There is no evidence that the proposal is necessary.
- Green Belt provides a strategic function for the Ivers by preventing sprawl from Greater London
- The proposal does not benefit from very special circumstances.
- Development would result in encroachment into the Green Belt
- Urban sprawl

Character/Heritage

- Impact on the character of the village of Iver Heath
- Increase in urbanisation within the Ivers
- Proposal would dwarf the local area
- Development would cause urban sprawl
- Iver Heath would be ruined by increase in industrial and commercial activities
- Proposal will change the nature of the semi-rural location

Amenity

- Interference with adjoining properties
- Loss of view
- Visual impact of the proposed development would be detrimental
- Views from the bridleway will be lost
- Proposal is close to many residential properties
- Light pollution into residential properties

Landscape/Ecology

- Impact on wildlife
- Harm to Iver Environment Centre
- Potential water pollution
- Loss of green landscape
- Loss of trees and plants
- Detrimental impact on Colne Valley Regional Park
- Contrary to the Colne Valley Green Infrastructure Plan
- Loss of Countryside
- Colne Valley Regional Park is being decimated by local infrastructure projects (Pinewood, HS2 and MSA)
- Destruction of good quality farmland
- Destruction of natural habitats
- Ecology report in terms of mammals is lacking
- Proposal will have a detrimental impact on local biodiversity
- Pollution will have effect on local wildlife
- No valid reason for destroying good quality farmland
- Colne Valley Regional Park already under threat from HS2
- Impact on the adjacent Ancient Woodland
- The local area supports a number of rare animals
- Small local roads unable to support traffic
- Disturbance of amphibian habitats
- Impact on nearby Sites of Special Scientific Interest

Highways/Parking

- Traffic congestion
- Increase in local traffic
- Local roads unable to cope with the extra traffic
- Impacts in terms of staff and delivery traffic
- Slips roads to the motorway service area too close to M40 junction, causing potential danger to highway users
- Traffic safety impacts on M25
- Impact on this busy section of the M25
- Impact of traffic diverting onto local roads
- Impact of construction traffic on the Slough Road (A4007)
- Impact of Heavy Goods Vehicles
- HGV traffic already has a detrimental impact on the Ivers and Denham
- Local road services are already in a poor state

- The Council should be giving the go ahead for a by-pass road around Iver Heath
- Potential of traffic using the proposed staff access onto the Slough Road
- This section of the M25 is already congested, a more suitable site should be identified
- Existing bus service along Slough Road is infrequent making it unattractive option for shift work at the proposed service station

Environmental Health

- Light pollution
- Noise impacts
- Traffic pollution
- Air Quality
- Impact on the Air Quality Management Area
- Noise and disturbance when facilities are in operation
- Impact of the proposal in terms of ground pollution
- Impacts of the proposal in terms of climate change
- Impact of noise and pollution on Iver Environmental Centre
- 24 hour opening will result in unacceptable light pollution
- Mitigation measures are required to reduce air pollution
- The area already has one of the highest pollution rates in the UK, the additional traffic from the proposal will increase this
- Noise impact from building works
- Impacts in terms of construction dust and noise
- Cumulative noise and air pollution from M25 and Heathrow
- Traffic emissions and poor air quality
- Smells from restaurant and fast food providers

Other

- Impact on access and visitors to Iver Environment Centre
- Impact on well-being
- Cumulative impacts of proposed Motorway Service Area and other major projects located in and around Iver
- Impact on local infrastructure
- Service area is not needed
- Increase in crime
- Littering
- Impact on house values
- M25 is already well served by service areas at Clackett Lane, Cobham and South Mimms
- Impact on the local community
- Flooding concerns
- Impact of development on adjacent flood plain
- Services would compete with local services
- There are other services nearby
- M25 has been operating for a number years without the need for an MSA in this location

- No demonstration how this proposal would meet sustainable development principles
- Services at Beaconsfield already serve the local area
- Impact on local footpaths
- No permanent police presence nearby
- Poor water and sewage infrastructure to serve the proposed development
- Proposal will impact on the already high water table
- Replacement bridleway needs to factor in all path users
- Safety of other road users needs to be taken into account
- Impact on the users and education of visitors using Iver Environmental Centre
- Concerns regarding public safety
- Adjoining roads to the M25 are already well served by Petrol Stations
- Similar proposal for Motorway Services was turned down at Elk Meadows
- There are already proposals for similar MSA's within the area
- Planners need to take a holistic view to all planning applications put forward to the Ivers
- Bridleway provides a vital circular link around the Ivers. The replacement bridleway needs to be provide prior and in a useable state.
- Ivers are under pressure from significant infrastructure projects such as Heathrow expansion and Pinewood Expansion.
- Impact in terms of crime as experienced already by Beaconsfield services
- Proposal would bring no benefits to the local area
- Uxbridge Town Centre already provides services for commuters and travellers
- Loss of vegetation will increase flood risk
- Impact of bridleway disruption on horses
- Impact of service station users on horses/bridleway users
- Concerns regarding disruption to bridleway and impact on its users from heavy traffic
- Application site is designated as a flood plain
- Hotel on the site is not justified
- Bridleway needs to be protected for local riders and walkers
- Land adjoining Iver Environment Centre suffers from frequent flooding
- MSA will become a free waiting area for those picking up from Heathrow Airport
- Previous attempt for an MSA in the Iver area was presented at public Inquiry and deemed inappropriate
- Extraction of gravel is an non-renewable resource and should not be removed
- Located on Council owned Green Belt should be protected and not as a money making opportunity by the Council