

For thirty years Iver Environment Centre; a partnership between National Grid and Groundwork south, has connected people to nature from our site in between the National Grid Substation and Mansfield farm. We deliver inspiring ecology-based sessions to primary school pupils alongside exciting nature based family learning activities. Our volunteering programme enables skills development whilst improving mental health and we provide specialist access to purposeful activity for adults with additional needs.

We connect around 10,000 people to nature each year and in 2020 our impact went national as we took Iver Environment Centre into people's homes through our Facebook live Nature Sessions, reaching primary school pupils from Liverpool to West Wales.

As part of the Colne Valley Regional Park, Iver Environment Centre has been involved in the HLF funded Landscape Partnership project; delivering assemblies to schools to engage pupils with the natural heritage of the CVRP, as well as installing landscape and ecological interpretation and hosting a summer school focussed on water protection.

### **A MSA will have extensive negative impacts on our Centre.**

Although we were not mentioned in the access plan submitted as part of the proposal the slip road from the M25 will come right past the entrance to the centre, overshadowing our sole access route. Below is a copy of the map submitted in the report: we have added a green line to show where coaches unload primary school pupils on a daily basis in the summer term. It is concerning that the feedback from the Highways Agency questions the size of the loop. If it needs to become bigger it will come even closer to us.



Figure 1 Submitted plan of MSA site. Green line shows where visitors to IEC are greeted

The noise and air pollution caused by the development will have significant detrimental effects on our ability to greet students at the front of the centre. The area surrounding our small car park is used by volunteers, including regular groups of adults with learning disabilities and their carers to grow food. The sensory garden in front of the building is an important teaching space. This entire space may not be able to function with the increased noise coming so close.

The noise from the MSA itself is also likely to be an issue, especially at night when sound travels further. People come to the centre for peace and events such as bat walks will not be possible with the 24 hour noise and light pollution from the MSA. One of the key attractions of Iver Environment Centre (for schools, adults with learning disabilities and volunteers) is its rural situation surrounded by green fields

Another big concern for us is security. We have several site users who run when alarmed. We are also extremely worried about the danger posed to our centre by 24 hour visitors so close to an outdoor learning site that is only manned during the day. The increased footfall nearby would inevitably lead to some foot traffic accessing our site and causing damage or theft. People may attempt to gain entry to the facilities of Uxbridge town centre from the MSA which could potentially bring them to our site.

The construction of the MSA would also limit centre operations and threaten the long-term sustainability of the Environmental Education Centre. In the past Iver Environment Centre has used some of Mansfield farm's land on occasion for parking. Without this possibility we are extremely limited in what we can do as our small car park only holds 20 cars. Without commercial activity such as private hire to subsidise our education work it cannot succeed. For larger family learning events we have to restrict car numbers. The single track from Slough Road to the centre with no path dissuades many local families from risking the walk with young children.

The quality of the experience will also be threatened by the proposed development. It would be ironic that a centre teaching people about the need to protect the natural world is approached via a unnecessary development on Green Belt land if it wasn't so sad. We do a lot of invertebrate surveys, plant recording, birdwatching and pond dipping on site. The local damage caused to woodland and hedgerows will impact on the biodiversity found on our site. The ecologists report submitted with the proposal states that there are no Great Crested Newt records within 2km of the site. I have an eDNA survey carried out by Jacobs in 2016 indicating the presence of GCN in our ponds as well as photos from 2020 of a GCN egg. Such an obvious error leads me to doubt the accuracy of the rest of the report.

Children and adults at Iver Environment Centre love watching Kestrels feeding on site. As a bird of prey, fluctuations in the number of smaller species will impact its survival. The loss of hedgerows and farmland habitat will threaten overall bird numbers. Visitors also enjoy discovering common toads, stag beetles and cinnabar moths, to name just a few of the BAP priority species that we have on our site adjacent to the proposed development. A decline in the quality of local habitats and destruction of critical green belt land will make it difficult for the remaining fragments to thrive. This will damage the experience of visitors; many of whom

come from urban areas that are amongst the 20% most deprived in terms of access to green space (IMD 2019).

The reduction in air quality due to the proposed development is not only a worry for children's developing lungs but the nitrogen deposition will negatively affect our plants and so the quality of the habitats that we have created here. We showcase a variety of different native and non-native habitats and the damage to their structure, along with the 24 hour noise and light pollution will cause harm to a variety of creature, not least our nocturnal small mammals and owls.

We do not have confidence in the promise to exceed the 10% biodiversity enhancement detailed in the proposal. The measures put in place are insufficient to do so and thorough investigation into the area has not been carried out to enable strategic planning. The increased air pollution will hamper the outlined efforts and there is a lack of consideration for long term habitat management in the planning application.

Another significant concern is access during the building work. The application states that a temporary entrance to slough road will be constructed to build the slip roads but gives no detail regarding where that access will be. Currently the only access to the fields where the slip road is proposed to be built is via gates from a lane leading from Slough Road to Mansfield Farm. This narrow, single lane is currently the only access to Iver Environment Centre. Use of that access route will cause significant disturbance to our operations as well as damage to that lane. The area where the lane meets Slough Road is already vulnerable to flooding and erosion and that would be permanently exacerbated by construction traffic.

The field where the slip roads are proposed to be built is under water seasonally. Building on flood plains is never wise and we are concerned about what would happen to that water after construction. As well as being a potential hazard for MSA road users, displacement of that water might threaten our site and access to it. Part of the Alder Bourne is situated in that field and I am not sufficiently reassured by their plans detailing how they will manage that. They intend to extend the culvert, an action specifically advised against by the Environment Agency as culverting increases flooding and destroys the value of the river habitat. I am also concerned about the possible pollution events that might occur as a result of these works and the likelihood of run off or displaced water bringing pollution and possibly even invasive species towards our Environmental Education Centre.

The visual impact of the slip road will be immense and will be visitors to the centre's first impression. It is not clear from the plans how the planting will work or whether it will be sufficient in winter. There will be a considerable period before the new planting matures when it is not only an eyesore but offers no protection against noise. We cannot teach effectively next to speeding cars.

Other concerns include the increased risk to wildlife from litter being blown onto our site and the destruction of wildlife corridors which currently bring animals to our site. There were no notices put up near the entrance to Iver Environment Centre and no leaflets posted to us notifying us of the works. The initial website from the developers was not the easiest to find even with good knowledge of search engine optimisation. As a clearly interested stakeholder it

feels as if it has been deliberately hidden from us, with no attempt to involve us in any consultative activities even after we registered our concerns on their website and asked to be kept informed.

### **Wider negative impact.**

As an Environment/Nature Studies Centre we have concerns beyond the immediate threat of development on the sustainability and functioning of our community resource. This is not the right place for a development of this type and the effects on woodland, hedgerows, waterways and biodiversity will be severe.

The farmland habitat that it would replace is part of the Colne Valley Regional Park, whose objectives include:

- To maintain and enhance the landscape, historic environment and waterscape of the park.
- To safeguard the countryside of the Park from inappropriate development.
- To conserve and enhance biodiversity

This unnecessary development goes against these listed objectives. They also encourage community participation and recreation in the countryside, which is being curtailed by the disruption of access around the proposed site. I feel for the riders who chose to stable their horses here and for the residents who chose to live here for the countryside trails. Who wants to ride around a motorway service area with all the antisocial behaviour that goes with such places? The mental health benefits to being in nature are well documented and removing access to nature at a time when people need it most is not responsible planning.

The final objective of the CVRP is to support the rural economy. This development and the resulting loss of yet more land from Mansfield Farm means that it is unlikely to be able to function as a farm in the future. Once the open outlook is lost, our 2.4 acres will feel a lot smaller.

All of the 46Ha of farmland that will potentially be lost to this development is situated within the Green Belt. This area of Green Belt is particularly important as it is narrow, has already been encroached upon locally and is the only green barrier between the urban sprawl of Hillingdon and that of Iver and Slough beyond. The purpose of Green Belt land is to maintain that barrier and protect the countryside. The characteristics of it according to the National Planning Policy Framework is that it be open and permanent. I do not understand how a proposal to build an unnecessary service area can be passed when it contradicts the NPPF. Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, with all other avenues explored. I challenge the idea that this MSA is exceptional and that this is an appropriate place for it. Removing all the benefits of Green Belt land from the local community whilst building something that will provide no amenity benefits for them is not in the spirit or letter of the framework. The harm caused by building on the Green Belt is not outweighed by benefits on a local or regional level.

NPPF Para 141 calls on local planning authorities when considering Green Belt 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.” This proposal does not enable local planners to do this were they to pass it.

There are specific concerns in the plans themselves. The island of Ancient Woodland within the development is vulnerable to increased air pollution and possible changes to the water table resulting from the development. Damage to Ancient Woodland cannot be mitigated. The wildlife it supports will suffer from the 24-hour lighting and noise pollution. The car park for more than 1000 cars covers an unnecessarily large surface area and the three-story hotel will have a major effect on the landscape as it is out of character with the surroundings even beyond the Green Belt, in Iver Heath.

The harm to recreational rights of way; the harm to watercourses which run through the development and the loss and harm to existing grassland, woodland, hedgerows and their accompanying biodiversity mean that this is not a sensible development and is not in line with the UK Government’s commitment to “A Green Future.”

### **We question the necessity of the MSA in this location.**

We challenge the perceived need for an MSA in this location. Motorists can get food, accommodation and petrol less than 8 miles away in Beaconsfield services. The proposed site is also just an 8-minute drive via junction 16 to Uxbridge town centre, passing several fast food restaurants on the way. Surely, planning should be encouraging people to break up their journey by supporting local businesses – an overnight stay in Uxbridge could have a significant positive effect on the local economy compared with a stop at the services.

The NPPF gives emphasis to minimising waste and pollution, mitigating and adapting for climate change and moving to a low carbon economy. A surplus MSA on Green Belt land in the heart of the Colne Valley Regional Park; containing a high number of HGV spaces and prominent petrol station does not do this.

The strategic Green Belt review published by the former South Bucks and Chiltern District councils in 2018 recognises the sensitivities of this part of the ‘London Fringe’ zone. As mentioned above this area is one of “...a number of narrow bands of Green Belt [that] are vitally important in preventing merging of settlements.” Damage to this strategic open space would compromise its role in protecting smaller settlements like Iver Heath with its unique character. Planners must look at the impact in consideration of the wider landscape; where the Green Belt is being eroded, ancient woodlands are being removed for HS2 works and a number of other planning applications are currently in consideration for Green Belt land. These potential developments threaten its ability to carry out its primary purpose.

The amplified impact of the MSA on such a vulnerable section of greenbelt is huge. If this development does go ahead we would ask as local biodiversity and community engagement specialists adjoining the site, that we be involved in the mitigation discussions, so we can ensure that they are commensurate with the enormous damage caused to the local community and landscape that we care so passionately about.

Furthermore, we are very upset that we have not been involved in any discussion thus far. No one from MSA or the council have contacted us to notify us of the potential development.

### Conclusion

We object to the planning application on the basis that it will have extremely significant detrimental effects on the operations of Iver Environment Centre and will damage our ability to support the local community at a time when improving the environment and connecting people to nature has never been so important. It would cause harm to the Green belt and associated biodiversity when the area is already under threat of not being able to carry out its purpose due to other proposed developments. We object to the loss of farmland, woodland, hedgerows and waterways.

The reduction in air quality is especially concerning for a site metres away from an education centre whose primary audience is children under 11 years of age spending time outdoors.

We disagree with the need for an MSA in this location and reject the idea that it could benefit the local community. We question whether it meets the NPPF requirements. The impact on the Colne Valley Regional Park and Green Belt is unjustified

We do not believe that the mitigation measures outlined in the proposal are sufficient to compensate for the damage done by this development and feel that the impact of the proposed methods are being deliberately overstated by the developers.

We are saddened that Iver Environment Centre has not been contacted by anyone regarding the development and that neither the developers nor the council have sought to understand the impact that the MSA would have on this key community resource.