

Iver Parish Council,
45B High Street,
Iver,
Buckinghamshire.
SL0 9ND

BY EMAIL: clerk@iverparishcouncil.gov.uk
plan@iverparishcouncil.gov.uk

24817/A3/COM/NPN/slh

15th March, 2021

Dear Sir/Madam,

THE IVERS PARISH COUNCIL NEIGHBOURHOOD PLAN 2020-2036
PRE-SUBMISSION DRAFT FOR INITIAL PARISH CONSULTATION
RESPONSE ON BEHALF OF DAVID WILSON HOMES SOUTHERN

We write on behalf of our client, David Wilson Homes Southern (DWHS), in response to the above consultation which seeks the views of interested parties on the initial parish consultation on the pre-submission draft of The Ivers Neighbourhood Plan in advance of the formal Regulation 14 consultation later this year. These representations follow DWHS response to The Ivers Parish Council Neighbourhood Plan Issues and Options Questionnaire submitted in September 2017.

Background and Context

DWHS has an interest in a parcel of land to the south of Iver High Street extending to 31.4ha and known as 'Land south of Iver Village', (See Location Plan at **Appendix 1**). The land is currently open and undeveloped except for a property to the south of the site. The Site, which was promoted through the now withdrawn Chiltern & South Bucks Local Plan (CSBLP), has the potential to accommodate a significant number of new homes, a relief road, additional services and facilities to support the Village (such as a new primary school, a medical centre and recreational facilities) and areas of public open space. The Site is identified as part of a wider potential development location under 'Site 9 - Land south of Iver Village' in Plan D of the Pre-Submission Draft Neighbourhood Plan.

The Ivers Neighbourhood Plan

A Neighbourhood Plan must be in general conformity with the strategic policies contained in any development plan that covers their area. In the context of The Ivers, and following the withdrawal of the CSBLP, this comprises the saved policies of the South Bucks District Local Plan (March, 1999) and the South Bucks Core Strategy (February 2011).



FS 29637

Registered in England
Number: 0C342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

Following local government re-organisation in April 2020, South Bucks District Council combined with Chiltern, Wycombe and Aylesbury Vale District Councils and Buckinghamshire County Council to become a new unitary local authority, Buckinghamshire Council. Buckinghamshire Council are in the early stages of preparing their new Local Plan, which is intended for adoption in 2024. It is acknowledged, in paragraph 3.12-3.14 of the Pre-Submission Draft Neighbourhood Plan (dNP), that given potential amendments to the spatial strategy, housing need and the requirement to accommodate unmet need arising from Slough Borough Council as part of the outcomes of the Wider Area Growth Study, it is difficult for the dNP to effectively anticipate its quantum of housing growth. As such, DWHS welcomes the commitment of the Parish Council to an early review of the Neighbourhood Plan to deal with the matter of housing growth to ensure consistency and general compliance with the development plan in the future.

As the development plan policies predate the publication of the National Planning Policy Framework (NPPF, 2019) the provisions set out in the Framework will be particularly important considerations in shaping the dNP policies until the plan making process for the Buckinghamshire Local Plan (BLP) advances and is afforded greater weight.

We therefore support the intent of the dNP and limit our responses to those policies where a contribution at this stage is considered helpful having particular regard to the 'basic conditions' as set out in paragraph 8 of Schedule 4B to the Town and County Planning Act 1990 (as amended) and the potential benefits development of Land to the south of Iver Village could provide for traffic and air quality.

Policy IV1 – Gaps between Settlements

The dNP defines five 'Local Gaps' within the parish, the spatial purpose of which seeks to prevent the visual coalescence of the settlements. The draft policy notes that development proposals which lie within a defined Local Gap must be located and designed in such a way as to prevent the visual coalescence of the settlements.

Land between Iver Village to the Ridgeway Industrial Estate is identified as Local Gap 'E' and includes land controlled by DWHS to the south of Iver Village. Justification for the identification of this area as a Local Gap is set out within the draft policy supporting text at para. 5.18 and notes whilst Green Belt assessments indicate this area of land is a functionally constituent part of Iver, further development in this location would result in the physical erosion and visual perception of the separation of Iver Village and Ridgeway Industrial Estate.

DWHS object to the identification of land between Iver Village and Ridgeway Industrial Estate as a Local Gap. The intent of the policy is set out to prevent the visual coalescence of settlements. Ridgeway Industrial Estate is not a separate settlement but rather part of a fragmented settlement boundary to Iver Village. Instead, and as identified through a Green Belt Review undertaken by DWHS to support the promotion of Land to the south of Iver Village to the CSBLP, the Site is considered to make a very limited contribution to prevent neighbouring settlements from merging, given Iver is physically and visually separated from Langley and Slough to its south by fields, roads, the railway line and the Slough Arm of the Grand Union Canal.

Moreover, the road network and the large scale buildings on the Ridgeway Industrial Estate arguably exert an urbanising visual influence on the existing Village. It is therefore considered development of Land to the south of Iver Village would, alongside further benefits outlined in the sections below, provide the opportunity to rationalise the fragmented settlement pattern of Iver and form a coherent settlement boundary of permanence to contribute to sustainable development.

The dNP recognises that all the land identified for 'Local Gap' designation lies within the Green Belt, and therefore already benefits from a high level of protection from inappropriate development. However, in anticipation of the pressures of housing growth and the associated possible exceptional circumstances case for Green Belt release in the emerging BLP, the dNP states the identification of Local Gaps reflects an expression of community support for retaining settlement identity and land valued by the local people for that purpose.

Notwithstanding our objection to the identification of land between Iver Village and the Ridgeway Industrial Estate as a Local Gap, as worded this policy in its entirety is considered unnecessary. The identified Local Gaps are all within the Green Belt where inappropriate development is, by definition, harmful under the Framework (Section 13) and saved development plan policies (Saved Local Plan policies GB1-5 and Core Strategy Spatial Strategy and Core Policy 1). The purposes of the Green Belt as set out in para 134 of the NPPF are noted to, inter-alia, check the unrestricted sprawl of large built-up areas, prevent neighbouring towns merging into one another, safeguard the countryside from encroachment, and preserve the setting and character of historic towns. Collectively these purposes serve to prevent both the spatial and visual aspects of potential coalescence.

The dNP recognises that this type of 'spatial expression' in the Green Belt is rare but identifies precedent set in the 'made' Ascot, Sunninghill and Sunningdale Neighbourhood Plan 2011-2026 (ASSNP) in a 'Gaps Between Villages' policy. However, it is considered there are some key differences in the two approaches.

Firstly, the proposed Policy Inset Maps of the dNP illustrate the proposed Local Gaps as a blanket designation incorporating all land between the identified settlements. This is contrary to the approach in the ASSNP where more selective gaps between villages are illustrated using a zig zag line covering a much smaller area.

Secondly, the Examiners Report to the ASSNP, recognised that as drafted the original 'gaps' policy would be more onerous than Green Belt policy, as it did not allow for special circumstances, did not recognise the kind of development that would not be inappropriate development in the Green Belt or allow for development which could reduce the separation of built areas but still be sustainable. Finding no precedent for such an approach in the Framework, and noting the presumption in favour of sustainable development, the Examiner considered the 'gaps' policy would fail to have regard to national policy.

Further recognising, in the case of the ASSNP, that Green Belt already appears to separate all the villages and, as such, separation in a manner compatible with national planning policy is already largely performed, the Examiner recommends replacing the 'gap' policy with a more positively worded policy which instead seeks to reinforce the positive characteristics of the Gaps identified.

As a result, the policy was amended in the final made ASSNP to ensure that development proposals in these areas complemented the relevant landscape characteristics through a series of specified criteria including, inter-alia, (a) locating structures where they will be viewed against built form, (b) retaining the proportion and scale of built structures and the space between them and (c) reference to the built vernacular of the neighbourhood area. The final policy therefore adopts a markedly different approach to that set out in the dNP and as a result cannot be used as an example of precedent.

Whilst draft policy IV2 does not explicitly seek to restrict all development, as drafted and consistent with the Examiners findings into the ASSNP, it is more onerous than Green Belt policy set out within the Framework. For example, it sets out that development *must* be located and designed in such a way as to prevent visual coalescence of the settlements. It does not allow for special circumstances, it furthermore does not recognise the kind of development that would not be in

appropriate in the Green Belt or allow for development which could reduce the separation between settlements but still be sustainable.

It furthermore focuses on 'visual' coalescence blurring the distinction between development that may physically reduce the separation between the settlements, has a landscape visual amenity impact, or indeed a visual impact in the assessment of the openness of the Green Belt. It also does not allow for development which may for example reduce the separation of built-up areas (visually and/or physically) but still be sustainable.

Taking all the above into account, and recognising the concerns raised by the Examiner into the ASSNP, DWHS considers that Policy IV1 as constructed does not have regard to the Framework and does not therefore meet the required basic conditions in that it has regard to national policies or contributes to the achievement of sustainable development.

Further to this, it is noted that Green Belt appears to separate all the settlements within the dNP area and consequently the role of visual separation is already largely performed but, in a manner, compatible with national planning policy. For the above reasons DWHS object to the drafting of Policy IV1 and request it is deleted as unnecessary from the Neighbourhood Plan.

Policy IV6 – Sustainable Travel

DWHS supports the objectives of Policy IV6 which seek to encourage sustainable travel through the Parish together with the identification of an Active Travel Network as shown on the draft Policies Map. DWHS further supports Part B of the policy which requires development proposals on land that lies within, or adjacent to, the Network to sustain and where practicable, enhance the functionality of the Network by virtue of their layout, means of access and landscape treatment.

Locating development, including new housing, close to the existing villages and well connected by pedestrian and cycle links will support the promotion of sustainable modes of travel to local shops, schools and community facilities minimising additional vehicular traffic generated by new development.

DWHS proposals for 'Land south of Iver Village' would fully support Active Travel and enhance the functionality of the existing Active Travel Network and would therefore be fully compliant with policy IV6 of the dNP.

A conceptual masterplan for the Site, enclosed at **Appendix 2** and within the Vision Document at **Appendix 3**, illustrates a comprehensive Active Travel Network solution, proposed within the landscape buffer adjacent to the proposed Iver Village Relief Road (shown dashed black on the enclosed plan), creating safe and attractive routes for pedestrians and cyclists through the development. Safe crossing points can be achieved where key pedestrian and cycle routes cross the Iver Village Relief Road and link into the existing network of PRoWs and wider pedestrian/cycle network.

In addition, a series of pedestrian and cycle routes will link into Iver's existing walk and cycle network to provide access to local facilities, thereby encouraging sustainable travel in and around the community. Links will also connect between the Site and the rail station.

Iver benefits from a good range of services and facilities including:

- Iver village centre and the High Street, which comprises shops, restaurants and pubs, the Village Hall, churches, Iver Medical Centre, a pharmacy, dental practice and a post office;
- The Iver Village Infant and Junior School are located approximately 450m and 500m from the Site; and

- Employment opportunities at Ridgeway Trading Estate, Thorney Business Park and Court Lane Estate, and further afield in central London, Uxbridge, Slough and Heathrow employment zone.

Additional facilities would furthermore be provided within any proposed development for the Site and likely include the following, which accord with the opportunities for improvement outlined in para 5.30 of the dNP:

- Primary school;
- Local shops;
- Healthcare facility;
- Open space, play and recreation areas;
- Secure cycle parking at key locations;
- Enhanced bus service(s) and waiting facilities;
- 'Safe streets' for walking to school; and
- Inclusive improved access to footpaths and PRoWs

The proposed development aims to maintain and strengthen the landscape character of the Site and its surroundings by adopting the following key principles, which are considered complementary to developing a high-quality Active Travel Network as set out in IV6:

- Careful consideration of the proposed layout to form a coherent extension to Iver;
- Provision of a strong, green buffer on the southern edge of the Relief Road through the Site, to provide a defensible boundary to the Green Belt;
- Provide a robust settlement boundary through new structural planting along the Relief Road and the enhancement of existing planting along the southern development edge, to provide a definitive and attractive southern edge to Iver, whilst contributing positively to the wider landscape character;
- Retain and enhance existing vegetation wherever possible and viable;
- Provide additional tree planting along Thorney Lane North frontage;
- Provide connections to the retained Iver Recreation Ground;
- Maintain and enhance existing footpath links into the network of footpaths, including the Grand Union Canal; and
- Provide green links to connect existing and proposed open spaces creating a network of recreational opportunities.

DWHS are entirely supportive of the sustainable travel policy set out in IV6 A, B and C. Their emphasis on the above proposals for the potential development of Land south of Iver Village are fully compliant with the following requirements of dNP:

"5.27 The policy seeks to encourage safe, accessible and convenient means of walking, cycling and horse riding through the Parish. It refines Core Strategy Policy 7 by providing a local element to its provisions. Additionally, as set out in Policy IV7, proposals will also need to ensure it accords with development plan policies which seek to improve air quality.

5.29 ...Where proposals include provision for landscaping, new means of access or new layouts, there may be an opportunity to relate the land better to the Network. At the very least, the policy requires that proposals that will undermine the existing value of the Network will be refused permission."

Importantly for Iver, if Land south of Iver Village were to come forward, then the Active Travel measures would not be exclusively beneficial to the site, the introduction of the new Relief Road as part of the proposals would provide wider and significant benefits to the existing community of Iver village to the north, including an enhanced safer and cleaner High Street environment where Active Travel could thrive in serving local amenities, businesses, and education. It is therefore considered

that Land south of Iver Village' because of its fundamental capability to deliver a Relief Road for Iver, would deliver the most sustainable travel benefits of all the development opportunity sites relating to Iver in the dNP and at minimum cost to the public purse.

Policy IV7 – Air Quality

Iver Parish is currently covered by an Air Quality Management Area (AQMA). Harmful levels of nitrogen dioxide on the High Street breach legal limits, which could cause serious respiratory and heart conditions for local people. There is also particulate matter pollution present for which there is currently no evidence to support a safe level of exposure.

Delivery of the proposed development and Relief Road on Land south of Iver Village would lead to removal of a large proportion of HGVS and traffic from Iver High Street, which sits within the AQMA. This is likely to reduce air pollution on the High Street and around sensitive receptors, such as Iver Infant and Junior Schools, and give an overall improvement in air quality.

In terms of proposed development of the Site, then the separation from the M25 motorway, and the prevailing wind direction, that will blow traffic emissions away from the Site, mean that local air quality will not cause significant design constraints for the proposed development.

Moreover, it is a key consideration that development proposals on Land south of Iver Village will go significantly further in providing benefits relating to this policy and relieving Ivers long term air quality issues, because of the wider Air Quality benefits the Relief Road would bring to Iver High Street and local community. Notwithstanding this, it is considered a missed opportunity of Policy IV7 of the dNP not to go further than just identifying the unresolved problem of HGVs contributing to poor air quality, as stated in para. 5.31:

"5.31 ... The high number of HGVs passing through the parish has long been recognised as a concern and remains unresolved. A large influx of HGVs is also expected in the area during the construction of planned National Infrastructure Projects. As a result of this, the entire parish has been designated as an Air Quality Management Area (AQMA). Nitrogen dioxide (NO₂) mean concentrations (µg/m³) continue to be recorded either just below or well above air quality objectives in England (set at 40 µg/m³)¹."

To reflect the substantial wide-reaching benefits a Relief Road would bring to Iver, it is considered that IV7 of the dNP should go a step further and explicitly refer to the urgent need for a Relief Road for the High Street and suggest priority for the development of site(s) which are best placed to deliver this, which would subsequently indicate Land south of Iver Village to be comfortably best placed.

Policy IV8 – Managing Traffic

It is acknowledged that the existing highway infrastructure currently in place to accommodate traffic, particularly in locations on the High Street and Thorney Lane North in Iver Village, is woefully inadequate and incompatible to the heavy daily traffic and proportions of HGVs that use these routes as an only option.

Concerns are primarily centred on the road safety of pedestrians and other vulnerable users; congestion; journey delays; and associated air pollution. The High Street, which offers amenities, schools and visitor attractions is blighted on a daily basis by these negative traffic related impacts and especially at peak times. The historic physical geometry of the High Street, which relates to relatively narrow footways and carriageways, especially in combination with on-street parking and frequent access points, exacerbates these impacts. In addition, the levels of through-traffic are also a compounding factor as well as future traffic and HGV growth, the latter of which, in the next 10-15 year period is likely to considerably worsen with the major transport infrastructure construction

projects that are committed and/or planned in this time period, including Crossrail, Western Rail Link to Heathrow (WRLtH), Heathrow third runway, M4 SMART motorway and CEMEX extraction site.

A Relief Road for Iver High Street is needed to remove HGV and through traffic from the village, and make its centre safer for pedestrians, and reduce congestion and air pollution through the village. This is needed as soon as possible not least because traffic and HGV will continue to grow especially with the major infrastructure construction projects that are due to come forward in this time period.

As described in the earlier section of these representations (IV6 and IV7) Land south of Iver Village can comfortably satisfy IV8 policy of the dNP by delivering substantial public realm and traffic mitigation measures (as identified in Part A of draft Policy IV8) both directly to mitigate future development on the site and then with a wider reach to significantly benefit the wider community of Iver and the High Street. This includes improved north-south active travel connectivity, a new Relief Road and associated traffic management on the High Street to significantly enhance the future High Street environment from a road safety, congestion and air quality basis.

The comprehensive package of measures that the Site can deliver in their entirety (and summarised in the response to draft Policy IV6), ensure any development would be fully compliant with Policy IV8, Parts A, B and C, when considering Iver.

In common with draft Policy IV7, para 5.40 of IV8 of the dNP refers to the unresolved problem of HGVs and makes the first of, what is considered to be, too few references in the dNP to the important need for an Iver Relief Road:

“5.40 It has long been recognised that there is an unresolved issue with a high number of HGVs travelling through the parish. The adopted 2011 Core Strategy policy 16 has made no impact on this matter. In Summer 2016, Bucks County Council commissioned a Traffic and Transport Study covering the mains settlements in the Parish which identified that the main route for HGVs will not change unless a Relief Road is considered. Bucks Council and the Ivers Parish Council continues to work together on the business case for the Iver Relief Road. If it is not possible to deliver a Relief Road this policy facilitates allocated funds being subsequently directed to the provision of alternative traffic mitigation measures to provide relief from heavy traffic, particularly that of HGV traffic, through the communities of The Ivers...”

The paragraph outlines the importance of a Relief Road but unfortunately raises some doubt on its delivery. This position is well-known to DWHS and their consultant team though detailed technical assessment over recent years, concluding that issues of deliverability, including affordability are prevalent. Even if the challenging civil engineering constraints, multiple land acquisitions and exponential investment could be justified and overcome to deliver Buckinghamshire Council's alternative option of a Relief Road via Ridgeway Trading Estate, then this would not be implemented in its entirety for many years.

This unsettled outlook is in considerable contrast to the opportunity and potential of Land south of Iver Village, which can deliver a private developer funded Relief Road for Iver in one early phase, across a much less challenging site. Furthermore, delivery of a Relief Road in this location would enable a safer and more practical connection at the western end with Langley Park Road avoiding significant disruption to the inappropriate connection that the Buckinghamshire Council option would need to make with Mansion Lane/ Hollow Hill Lane and the significant engineering challenge of the adjacent rail and water ways, Cemex site and multiple land possessions. All of which result in a fraction of the delivery time and cost when taking forward the alternative option on land south of Iver Village. This developer funded construction cost for the Relief Road solution would furthermore free up precious public sector funds for other urgent needs in The Ivers and wider County.

The second and important reference to Iver Relief Road is stated in Chapter 6. Implementation, section 6.4:

“Local Infrastructure Improvements

6.4 Where opportunities arise through Section 106 agreements (or through the Community Infrastructure Levy) to secure financial contributions to invest in improving local infrastructure, the Parish Council propose that the priorities for investment of future Community Infrastructure Levy, and/or S106 contributions received by the local planning authority are:

- Traffic mitigation for the communities of the Ivers
- Secondary School provision
- Iver Heath Village Centre project
- Iver Village Environmental Improvements - Creation of a traffic-calming scheme, streetscape improvements, highway de-cluttering and public realm enhancements to Iver Village linked to the delivery of the Iver Relief Road.
- Improving local road and active travel infrastructure”

The above requirements are entirely consistent with the proposals that Land south of Iver Village could deliver in part, or entirely as in the case of the 4th bullet.

Policy IV9 – Reducing Heavy Goods Vehicles

Iver Village is served by an historic, narrow High Street with small shops and businesses on both sides, numerous accesses, on-street parking and narrow footways. HGV traffic in the local area has limited routing options due to various weight, width and height restrictions and has, for decades, been forced to use the High Street. The result is that a significant amount of HGV traffic currently travels through Iver Village, with surveys indicating that around 1,500 HGVs currently pass through the village on a typical weekday.

Observations have indicated that there is significant traffic congestion and associated hazardous road safety conditions along the High Street. The combination of HGVs, on-street parking and high levels of through traffic increase the risk of conflict and contribute to a poor environment for people and transport movement. An AQMA has been declared within the area, reflecting grave concerns on the levels of pollution that have been recorded on the High Street because of the polluting lorries especially during the slow-moving congested periods of each day.

DWHS acknowledges recognition in the draft Neighbourhood Plan that Iver is impacted by HGVs and commercial vehicles and is pleased that the draft Plan supports proposals for development within HGV generating sites (as identified in the supporting Policies Map) which would seek to reduce the impact of these vehicle movements. Equally, DWHS supports the thrust of the policy to refuse planning permission for uses which could exacerbate the problem.

Unlike the latter part of the now withdrawn CSBLP draft policy DMCP4, the dNP does not make any reference to a potential Iver Relief Road or indeed how development proposals that could have an additional impact on traffic in the Ivers can contribute towards its delivery.

A Relief Road would permanently remove the majority of HGVs and other through-traffic from Iver High Street and on to the new purpose-built road, designed to modern highway standards, away from Iver’s existing schools, main village centre and other local amenities.

On a typical weekday, a Relief Road, located within Land south of Iver Village could, conservatively, be expected to remove around 700 HGVs and 5,000 vehicles from Iver High Street.

To compound air quality and road safety conditions, HGV and traffic levels are predicted to increase in the near future, because of movement of material from major infrastructure projects nearby, such as the CEMEX works, the WRLtH project, M4 Smart Motorway works, completion of Crossrail and then possibly the considerable Heathrow Expansion in the longer term. Additionally, associated works with the WRLtH are anticipated to close Hollow Hill Lane, resulting in additional traffic routing through Iver. Continued growth in e-commerce and need for delivery and logistics will also contribute to growing proportions of medium and large goods vehicles on the route. In addition, any plans to permanently close alternative routes or indeed when congestion and delays occur on nearby M25 and M4 routes, then this often leads to more traffic reassigning via Iver and the High Street.

The concept of an Iver Village Relief Road to reduce HGVs using the High Street is not a new one, and has been considered for over 25 years, but to date nothing has been suitably planned and delivered. This is now considered to be more critical than ever, and indeed, recent transport evidence states that an Iver Relief Road is 'critical' infrastructure, 'required' as part of the Local Plan. It has furthermore been stated in the evidence that *'The County Council have advised that an Iver Relief Road is required to relieve the significant transport pressures in this part of the County.'*

Buckinghamshire Council published a Transport Paper (March 2010) which looked at the issues of HGV movements in and around the Iver/Richings area and have commissioned subsequent studies highlighting the considerable concern that such movements had on the residents of Iver Village, resulting in negative environmental, road safety and amenity issues in people's everyday lives. The two schools located along the High Street are particularly prone to hazardous highway conditions created by heavy traffic flows and on-street parking combined with high numbers of HGV movements.

There is a clear opportunity as part of the dNP to promote a Relief Road as part of sustainable development to assist in reducing the amount of HGV traffic movements through Iver Village, and as such deliver significant benefits to existing residents. Land south of Iver Village is considered best placed to achieve this most quickly and cost effectively.

Key benefits a Relief Road for Iver as DWHS are proposing, include:

- Potential to remove around 75% of HGV traffic (700 HGVs per day) and around a third of general traffic from Iver High Street;
- No major physical barriers to cross, and therefore a cheaper, easier and quicker to deliver Relief Road than alternative options;
- Purpose-designed Relief Road, connecting to suitable existing local roads, discouraging use of the High Street;
- Potential traffic calming, such as gateway features and speed reduction, through the village
- Road safety benefits for vulnerable users including pedestrians, school children and parents, cyclists etc;
- A Relief Road that is entirely deliverable because of a favourable land ownership position;
- A Relief Road that will be fully funded by the developer and not the taxpayer;
- Early phase delivery of the Relief Road, reducing development impact on the local road network, and reducing risk of delayed development (and therefore risks to five-year land supply)

An Iver Village Relief Road would create a new settlement edge, thereby providing a well-contained and sustainable location for residential development to its north. Structural planting along the Iver Village Relief Road would screen the proposed development and provide a natural and defensible edge to an amended Green Belt boundary to maintain visual separation and prevent the coalescence of neighbouring settlements.

Policy IV16: Climate Change Mitigation – Carbon Sink

Policy IV16 requires all proposals for new buildings to contribute to carbon sequestration (sinking) in the Neighbourhood Area. This is set out to be achieved through (i) the incorporation of onsite woodland planting on sites of more than 2ha or, where this is not practical or on sites of less than 2ha, (ii) via a financial contribution to the Buckinghamshire Carbon Sink Fund.

Whilst DWHS support the objectives to mitigate the impacts of climate change to contribute to the achievement of sustainable development, the draft policy as currently worded is not supported by any technical evidence to justify exceeding Local Plan requirements. Furthermore, there is reference to financial contributions towards an, as yet, undeveloped 'Buckinghamshire Carbon Sink Fund' detail of which is noted will be set out in a forthcoming supplementary planning document. The policy is therefore premature in its drafting in the absence of this information. The policy as constructed does not allow for the consideration of site-specific circumstances in its application. There is no guidance on the specification/quantum of woodland to be provided, the appropriateness of the location and its long-term management. Furthermore, the policy does not allow for commercial viability to be taken into account.

In February 2021, Buckinghamshire Council announced a commitment for the County to become carbon neutral by 2050 in an ambitious Climate Change strategy, this includes planting in excess of 540,000 new trees, and measures to reduce carbon emissions from development, vehicles and wider climate control initiatives. It is therefore considered unnecessary to have further local standards which have the potential to conflict with emerging wider Council strategies and therefore quickly become outdated. DWHS therefore request this policy is deleted.

Policy IV17: Climate Change Mitigation – new buildings

This draft policy seeks to encourage and incentivise the use of Passivhaus standards of building design for all new building projects in the Plan area. The policy is in three parts.

Part A states for schemes where it can be demonstrated at least 75% of the building units are certified to Passivhaus standards it will not be necessary to provide, inter-alia, a sustainability, energy, ventilation, daylight/sunlight statement/assessment with the application, make provision for on-site renewable energy or financial contributions, calculate carbon emissions from any other part of the development, demonstrate reduction in life-cycle carbon emissions or make a financial contribution to meeting the costs of a Travel Plan or other climate change mitigation measure.

Part B notes that schemes certified to Passivhaus standards may comprise terraced and/or apartment building forms of a higher density than the character of the area provided it will have a less than substantial effect and, finally, Part C requires planning permission for new dwellings to include a planning condition requiring the provision of a Post Occupancy Evaluation Report to the Local Planning Authority.

Whilst we commend Iver Parish Council for supporting objectives to address the climate change emergency, DWHS raise concern about Policy IV17 which, as drafted, is not considered to provide a clear and consistent approach in which to achieve them.

The draft policy, as constructed, fails to have regard to the development plan when taken as a whole. Obviating the need for planning applications to be supported by a series of supporting technical assessments as outlined in Part A would not only allow a departure, in some instances, from Buckinghamshire Council's validation requirements, but also fail to consider the wider remit of sustainable development through removing any need to financially contribute to travel plan objectives, meet Local Plan renewable energy targets and satisfy sunlight/daylight amenity standards contrary to the development plan. Part B would furthermore be inconsistent with development plan policies relating to high quality design, character and amenity, material

considerations which collectively also have an impact on the acceptability/or otherwise of a development proposal.

The Government has declared its intent to adopt the Future Homes Standard in 2025 which will equate to a 75% improvement on current CO₂ standards seeking to achieve a good basis for reaching the overall national net carbon zero goal by 2050. The future standard supports the principle of a fabric first approach by delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon off-setting. The Future Homes standard is intended to be applied nationally meaning the application, and introduction, of further local standards is considered unnecessary and potentially risks being inconsistent with emerging Government policy.

Whilst the supporting text to Policy IV17 recognises the Government's ambitions, the intent of the policy is noted to provide an alternative means of meeting these objectives. Technical evidence has not been provided to justify a local approach which exceeds or unilaterally amends the requirements set out nationally or indeed within the Local Plan in the balanced consideration of achieving sustainable development. DWHS request this policy is removed or amended to better align with the aspirations of Buckinghamshire Council and the Government's Future Homes standards.

Summary

DWHS commends the Parish in the work undertaken to prepare the dNP and the objectives and aspirations set out therein. However, as set out in detail above, concern is raised regarding the following key policies:

- Policy IV1 – Gaps between Settlements

DWHS object to the identification of land between Iver Village and Ridgeway Industrial Estate as a Local Gap. The Local Gaps identified all lie within designated Green Belt, the purpose of which is to, inter-alia, protect the unrestricted sprawl of large built-up areas and prevent neighbouring towns merging into each other. As constructed, Policy IV1 does not have regard to the Framework and therefore fails to meet the basic conditions as set out in paragraph 8 of Schedule 4B to the Town and County Planning Act 1990 (as amended) and should be deleted.

- Policy IV7 – Air Quality

Recognising the issues concerning the potentially harmful levels of pollution that have been recorded on the High Street and the potential for this to increase due to the movement of material from major infrastructure projects, it is considered Policy IV7, as drafted, misses an important opportunity to explicitly refer to the urgent need for delivery of a Relief Road for the High Street and suggest a priority for the site(s) which are best placed to deliver and or contribute to this.

- Policy IV8 – Managing Traffic

In common with draft policy IV7, Policy IV8 as constructed misses an opportunity to explicitly reference the need for a Relief Road for Iver and the opportunity for new development proposals to contribute towards its delivery in part C.

- Policy IV9 – Reducing HGV's

As set out in the body of the document, the most effective and long-term solution to reducing HGV movements through Iver would be through the delivery of a new Relief Road and in keeping with responses to IV7 and IV8, DWHS request that additional reference is

made to the needs and aspirations for a Relief Road to reduce HGV movements in the Village.

- Policy IV16 - Climate Change Mitigation – Carbon Sink

As constructed, this policy exceeds requirements set out in the development plan without sufficient technical justification or guidance on its implementation. Whilst DWHS support the aspirations to address climate change and contribute to the achievement of sustainable development, the policy as drafted does not allow for the consideration of site-specific circumstances in its application or commercial viability to be taken into account. As the detail of the Buckinghamshire Carbon Sink fund is noted to be contained within an SPD, the policy is considered unnecessary and should be deleted.

- Policy IV17 – Climate Change Mitigation – new buildings

Policy IV17 fails to have regard to the development plan when taken as a whole, seeking to incentivise and encourage the adoption of passivhaus standards as an alternative approach to standards set either nationally or through development plan policies. With the Government set to adopt the Future Homes Standard, the application of further local standards is considered unnecessary and inconsistent with the requirements of paragraph 150(b) of the NPPF which notes that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Conclusions

In the context of the responses provided, DWHS has taken the opportunity to highlight the potential of Land south of Iver Village as a prospective development Site to provide sustainably located residential development which would provide the opportunity to deliver the following key benefits to the local community of Iver, addressing a number of objectives of both the emerging Neighbourhood Plan and Buckinghamshire Council.

- The opportunity to fully fund and directly deliver within 2 years of commencement of development a 'Relief Road' to the south of Iver Village to enable a significant reduction in the amount of HGV movements running through the Village, together with a reduction in other vehicular traffic to the benefit of Air Quality. The relief road would extend between appropriate junctions on Langley Park Road to the west of Iver High Street and Thorney Lane North to the north of the Ridgeway Trading Estate;
- The opportunity to provide additional services and facilities such as a new primary school, a medical centre and recreational facilities well related to existing facilities in Iver village to enabling the integration of established and new communities;
- Enhancing pedestrian and cycle access between Iver Railway Station and Iver Village; and
- Providing a mix of new homes including affordable units alongside possible extra care provision.

Further details of the development opportunity are set out within an indicative masterplan at **Appendix 2** and a Vision Document at **Appendix 3**.

We trust that this representation will assist The Ivers Parish Council in the ongoing preparation of the Neighbourhood Plan and we would be grateful to receive your acknowledgement of the submission. We would, furthermore, welcome the opportunity to meet with the Neighbourhood Plan Group to discuss the development opportunity on Land at South Iver and the role it might play in seeking to realise the dNP objectives.

In the meantime, and if you wish to clarify any matters, please do not hesitate to contact me on 0118 943 0000.

Yours faithfully,



CHARLOTTE O'MAHONY
Associate

cc: Sophie Horsley – DWHS
James Overend - Stantec

Encs.

- Appendix 1 – Site Location Plan
- Appendix 2 – Indicative Masterplan
- Appendix 3 – Vision Document