

16 July 2021

The Ivers Parish Council  
45B High Street  
Iver  
SL0 9ND

Dear Sirs and Mesdames

### **The Ivers Neighbourhood Plan 2020-2036 | S5 R14 Representations**

The following is a collation of current and previous representations by IHRA members made on the Ivers Neighbourhood Plan (NP) now part of our formal Part 5 Reg 14 submission:

1. Generally, there appears to be:
  - a. no reference to the potential use of Development Frameworks, Development Briefs, Neighbourhood Development Plans, Development Orders and CRTBOs. These provide an opportunity for wider stakeholder engagement in the planning process and a reduction in uncertainty and mitigation of the risk of dealing with multiple and piecemeal planning applications.<sup>7</sup> Inclusion and reference to these would also enable policy to better align with objectives of NPPF Para 52 in this respect.

#### **Tailoring planning controls to local circumstances**

51. Local planning authorities are encouraged to use Local Development Orders to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area.
52. Communities can use Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission. These require the support of the local community through a referendum. Local planning authorities should take a proactive and positive approach to such proposals, working collaboratively with community organisations to resolve any issues before draft orders are submitted for examination.
53. The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities). Similarly, planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so.

- b. no spatial mapping of Development Opportunity Areas for small scale projects for local community benefit i.e. social, life-time educational, specialist care, low-cost local homes, especially on brownfield sites owned by Buckinghamshire Council close to or within settlement areas.
- c. no spatial mapping of potential **Agro-Ecology Zones** i.e. using G1, G2, G3 agricultural land for growing stuff rather than enabling Buckinghamshire Council to sell or lease it off for commercial uses.
- d. no Golden Thread of a Low Carbon-based local economy, in line with government ambitions, with planning policies sharing more ambitious objectives of NPs elsewhere.<sup>4</sup>
- e. incomplete and conflicting spatial mapping of valued **Amenity Spaces and Facilities** including **Local Green Spaces**, notwithstanding the Gap Policy adopted i.e. Evreham Centre and Iver Heath Fields. This is particularly important where ownerships and rights of use over the land involved may not be clear i.e. Iver Heath Recreation Ground and Iver Heath Fields.

2. With the demise of the SBDC/CDC Local Plan, of particular concern is the loss of Green Belt land to commercial development, rather than residential development, in some cases in effect facilitated by Buckinghamshire Council through the sale of agricultural land. It is evident from recent planning applications – Pinewood and Welcome Break to name but two – that Green Belt planning policy has not proven adequately drawn to prevent commercial development which is largely harmful to the local environment and of dubious economic or social benefit. Greater effort should be made to mitigate this risk in the NP, albeit the case that it might not chime well with BC strategic ‘economic’ ambitions.
3. We would like to see areas of land identified as “of legitimate community development interest”, whether they be Green Belt or Brownfield sites and perhaps of differing ownerships. Within these areas, policy should require that these be with the involvement of the local community. In this way, Stakeholder co-designed **Development Frameworks** and/or **Development Briefs** could be brought forward, perhaps via **Planning Performance Agreements** ahead of the submission of any planning applications. Such a process would enable the integration of real and substantive community ‘gains’ agreed with developers and landowners in advance. This could also be done in the form of competitions whereby TIPC actively seeks co-designed proposals for specific sites or areas of concern, or indeed those brought forward by TIPC via Neighbourhood Development Orders (NDOs) in partnership with local landowners.
4. **Policy IV12 Local Green Spaces**

There seem to be some significant omissions and nowhere near enough emphasis placed on our local green spaces. A key example for Iver Heath would be Iver Heath Fields which appear not to be mentioned in this section. The only mention of Iver Heath Fields (IHF) is on page 20 under **Key Potential Development Locations in the Parish**.

#### Open space and recreation

96. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
  - a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
  - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
98. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

<sup>41</sup> This includes transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres.

28

99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.
100. The Local Green Space designation should only be used where the green space is:
  - a) in reasonably close proximity to the community it serves;
  - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
  - c) local in character and is not an extensive tract of land.
101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

This seems to afford IHF no specified protection within the Neighbourhood Plan at all; to the contrary, it highlights them on a map of potential development locations. Areas of green such as IHF are and have been used as public green spaces for decades and should be clearly stated as such in the list. The fact that IHF are in the Green Belt and so fall under national policy seems irrelevant since the Ivers are set in Green Belt; there are at least 50 references to Green Belt in the Ivers NP document. Neighbouring Denham Parish Council did a comparatively more robust job of doing their best to protect their green spaces in their NP. See **Appendix B. Local Green Spaces (Policy DN8)** pages 58-63 where there is a much wider, diverse and inclusive list with reasons and images.

[https://www.denhambucks-pc.gov.uk/\\_UserFiles/Files/FINAL%20Denham%20NP%20Dec%202020](https://www.denhambucks-pc.gov.uk/_UserFiles/Files/FINAL%20Denham%20NP%20Dec%202020)

The omission of IHF, and the inclusion of other land, in private ownership, which is not “demonstrably special” to the community seems entirely inconsistent with the objectives of NPPF Para 99-100.

5. Otherwise, and more generally, the stated "visions" and "objectives" as drafted lack ambition and are not aligned with the NPPF and other advice. To this end we would draw your attention to Neighbourhood Planning guidance as attached and recommend that the Plan be more pro-active and engaging.
6. **Policy IV11 – Village Centres.** This makes no mention of a Village Centre in Iver Heath. Although retail provision is more fragmented than in Iver and Richings Park, it does nevertheless have smaller areas of retail provision within walking distance of settlements. In this respect, perhaps ‘Village Retail Centres’ would be more appropriate. In terms of community facilities, reference should also be made to IHRA’s **A Plan for Iver Heath (2019)**.
7. **Policy IV13 -Colne Valley Regional Park.** We support this policy and its objectives. That said, we would welcome a requirement that developments “demonstrate that they have considered how proposals contribute to a vibrant and sustainable rural economy within the Park”. This would elevate the importance and potential of existing and regenerative agricultural uses within the wider ‘cultural’ landscape and strengthen the identified strategic objectives.

Apart from helping to resist the threats posed by commercial land uses within the Greenbelt, it would also support the case for a further requirement for developers to provide some Site Sequential Analysis, such as that required by BREEAM, to justify development of a site particularly where a change of use is involved.

Otherwise consideration should be given to modification and augmentation of the map provided on P56 illustrating Green Infrastructure Network to provide a further overlay of **Agro-ecological Opportunity Zones**.

Improved mapping, in this respect, would also assist to align policy with NPPF Para174:

## Habitats and biodiversity

174. To protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity<sup>56</sup>; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation<sup>57</sup>; and
  - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

8. Our version of The Vision in the Ivers Neighbourhood Plan would, for example, include these lines: *“to build a community that is resilient in its capacity to support the needs of residents in the face of local development pressures, global economic and biological shocks, and the wider context of a climate and ecological emergency.”*

9. The NPPF (para 2) summarises the objective of sustainable development as “meeting the needs of the present without compromising the ability of future generations to meet their own needs” and states “the purpose of the planning system is to contribute to the achievement of sustainable development”. At this stage, we do not see this draft of the NP succeeding in this respect.
10. **Policy IV14 - Passivhaus Design.** We would support modification of this policy to one described as “**Low-Impact Development**” which could make reference to Passivhaus but also other zero-carbon tools available to developers but also encourage the retro-fit and refurbishment of existing buildings as a more desirable ‘first choice’, in terms of “sustainable development” rather than new-build. Here too developers could be required to demonstrate that consideration has been given to the use of existing buildings which could be converted for residential use for example.
11. **Policy IV2, IV3 & IV4** The emphasis placed on the "appearance" of the villages with reference to the preservation of "townscape" and "areas of special character" supported by "a design code", whilst understood as entirely legitimate and important are, we suggest, given undue weight. In practice, given the scope that Permitted Development gives householders to alter dwellings without being required to seek planning permission – including removing original windows and changing roof tiles – the Design Code is unlikely to have any meaningful impact.
12. Otherwise, we would generally like to see policies built around the support of broader and more fundamental community concerns, supporting community resilience such as that promoted by the Transition Network ([www.transitionnetwork.org](http://www.transitionnetwork.org)).
13. Finally, we are pleased to support and associate ourselves with the representations made by Colne Valley Regional Park as submitted.

We submit therefore the foregoing, and our reference documents as attached, for due consideration.

With kind regards

*Leigh Tugwood*

Leigh Tugwood  
Committee Member  
Iver Heath Residents' Association

Attachments: See Zip file “IHRA TIPC NP R14 13-07-21”

- [1] The short-haul response to Covid-19 and the Climate Emergency (Transport for Quality of Life, 2020)
- [2] Planning White Paper and Changes to the current planning system (CPRE, 2020)
- [3] Joint Vision for Planning (CPRE, 2021)
- [4] Neighbourhood Planning in a Climate Emergency (Centre for Sustainable Energy, Feb 2020)
- [5] The Ivers 2035 – Conversation Starter V6 (I-Can: Ivers Community Action Network Ltd, Oct 2020)
- [6] The Village Plan (Iver Heath Residents Association, 2019)
- [7] Neighbourhood-development-orders-inc.-community-right-to-build-orders (Locality, 2021)