

APPENDIX A: Consultation Responses and Representations

Councillor Comments

Cllr Luisa Sullivan

(27.10.20)

I represent The Ivers, Richings Park & Thorney as a Cllr, and I am a resident of Iver Heath.

I would like to register my initial response as an objection to this planning application. I am disappointed that the client has chosen to submit this extensive application without any sufficient inclusive prior consultation with the local community or its representatives.

The speed of this application submission and suggested 'local consultation data' appears nothing more than a 'smash and grab raid' over Green Belt designated land at a time when the community, and country is in the midst of pandemic, thus disenfranchising the community from engaging collectively and wholeheartedly in fair inclusive consultation process, as would be expected and was historically conducted, on previous Pinewood expansions.

I fail to see how the client can project a credible forecast regarding employment figures for the industry and projected employment potentials in a pandemic year. When our current government cannot project further than a few weeks at a time, and changes are continuing to evolve daily. The traffic volumes, figures and visitor numbers projected for this attraction venue are wholly unacceptable, and it is clear in the vast number of objection letters submitted, that for the Ivers community, the traffic volumes and visitor numbers are of greatest concern, in an area already congested and incapable of taking such numbers. Within a designated AQMA zone.

Community objections clearly define the current insufficient road network and resident fears and predictions of proposed operating hours of this attraction creating one of top 10 attractions in the UK. With such a current inefficient road network.

The sheer size and scale of this new application, phase 4, will overwhelm the settlement of Iver Heath, geographically, along with the surrounding lanes and roads.

The 'neighbours initially consulted on application' list of consulted, I reject and dispute. My address as a resident sits on this list, however I do not know how this list was formed. The only meeting, I recall attending was a zoom Pinewood briefing the same week that the client submitted the full planning application. I was invited to this online presentation as a local Cllr, not as a resident. I ask how this list is relevant as proof of consultation when the application was formed and submitted without community responses.

S106/CIL/ Community Mitigation and comprehensive compensation package considerations. Whilst the timeline in this application requires responses by 29th October. I am conscious there are stakeholders, neighbouring parish councils and neighbouring community boards that are considering their position and mitigation. I have stated, formally, that there should be a co-ordinated and collective approach in the requests for mitigation, if planning consent is granted.

The film and creative arts are a multi-billion-pound industry and yet to date, historically this community has been deprived of any mitigation in the form of monetary or mitigating measures to replace the loss of our precious Green Belt.

In planning terms it is often proposed that loss of green belt land can be mitigated by replacing like for like, whilst its evident Pinewood has been purchasing vast amounts of GB land to support its ambitious plans yet has failed in this application to mitigate the loss of GB by proposing any replacement

Cllr Paul Griffin

(26.10.20)

I would like to call in this application based on objections from residents.

(28.10.20)

This is an ill-conceived scheme which attempts to take advantage of the current pandemic situation to create a high traffic visitor attraction within the Greenbelt and within an infrastructure that is already struggling to cope with general day-to-day traffic. There is little to support in this proposal other than the promise of local employment, a constant theme for Pinewood and one that rarely bears fruit. There has been little if any consultation with residents and only a meagre consultation with local Councillors in the form of 'this is what we're going to do'.

Support for these proposals seems only to come from those that don't live in the locale whilst most residents have vociferously objected.

This proposal, if it is to be seriously considered, needs to be debated in public taking account of all the various impacts it would have, and there would be many, from noise, traffic and light pollution, parking, loss of precious Greenbelt and risk of localised flooding.

Councillors are united in their shock at how quickly this has been presented without the usual consultation process and will create a list of 'asks' that need to be agreed before this application can be seriously considered. Many of those asks, at this moment, would seem impossible to achieve in this area and within reasonable budgets. That said, Pinewood would make a great deal of revenue and profit from this application should it proceed so there might be opportunities for major infrastructure improvement and some 'joined-up' thinking that could improve the area on many levels. I cannot, at this stage, support this proposal and object to it strongly in its current form.

Cllr Wendy Matthews

(13.11.20)

This application requires the loss of 33 hectares of green belt in the strategic gap between Iver Heath and Slough. The green belt assessment carried out by Bucks County Council for the local plan identified Pinewood Road as the defensible boundary for this area.

The exceptional circumstances argument does not stack up – there is no necessity for this development to be located here on green belt. Pinewood own sites across the world and in the UK where this could be sited. There is no evidence to require the co-location of the sites – the previous Pinewood experience was located in Cardiff docks. This proposal should be located on a sustainable site where regeneration is needed not on green belt and no attempt has been undertaken to assess alternative sites.

The economic benefit this visitor attraction would undoubtedly create will assist in boosting the economy in the longer term but there is no evidence that much of this will be derived in Buckinghamshire. This is a high employment area and Pinewoods own figures indicate that only around a third of the jobs created will be filled locally, the rest coming from Slough or Uxbridge where there are greater levels of population. The visitor experience is self-contained so there will be little

benefit to local businesses. The transport offer is from Slough which will be the landing point for visitors and where they will stay and spend.

The site is not in a sustainable location hence the need for buses and huge car parks which will result in massive numbers of vehicles on our local village roads, which the traffic assessment accepts are already at or near capacity. The traffic assessment is inadequate as it only considers the area immediately around Pinewood and not the wider area. With the use of satnavs it is inevitable that traffic will use the local roads rather than the M25/M40, particularly when the M25 is at a standstill – a regular occurrence. The generation of this level of additional traffic on Buckinghamshire roads is completely at odds with the ambition of the Council to reduce carbon emissions as soon as possible.

The Pinewood Green area of Iwer Heath is already dominated by the huge industrial Pinewood buildings and the addition of these would result in an appearance of enclosure which would negatively impact on the sense of place for the village.

This site is surrounded by green belt to the west and east and the visual impact of this proposal with 22m high buildings on these areas will be significant. The open access to Black Park via the Peace Path will result in massive pressure on this precious County Park which is already facing considerable challenges.

This proposal will have a devastating impact on the quality of life of local residents and I am therefore opposing it.

CLlr Ray Sangster (ex councillor)

(22.11.20)

As a Member I formally request a Call-In.

Areas to be discussed are

- 1) A road network expected to deal with 2 Million visitors per year - HOW?
- 2). Air & Noise pollution.
- 3). Illegal parking across Pinewood Green.
- 4). The use of 'rat runs' across The Iwers.
- 5). The impact on The Iwers with the closure of Mansion/Hollow Hill lane.
- 6) The impact upon The Iwers when the M40, M4 & M25 close.
- 7). 77 acres of Green Belt disappearing from one location, The Iwers.

In addition, will the Police be involved in managing traffic? AND, when will members be advised of the total of 106 monies available?

Joy Morrissey MP

(21.07.21)

I am writing to place on record my objection to the proposed expansion of the Pinewood Studios site, as laid out in this application.

The first point of concern is that this development would be on Green Belt land. Given the very little Green Belt land left as open green space in the Iwers, I do not believe it is possible to mitigate the loss of the 33 hectares identified in this application.

The specific site in question forms the strategic gap of Green Belt land that separates Buckinghamshire from Slough. Eliminating that protection by granting this application would leave the Iwers and the wider south Buckinghamshire area open to urban sprawl and potential encroachment from Slough. This is totally unacceptable.

The area proposed for development is in the middle of the Colne Valley Regional Park area and in very close proximity to Black Park, which is a key feature of CVRP. The approval of this application would constitute significant loss of amenity to local residents as it would impede their access to and enjoyment of Black Park, a vital and treasured local asset.

This development would compound a number of issues that are already putting pressure on the health and wellbeing of local residents. The level of traffic flow through the surrounding area is very high, causing problems of road safety, congestion, noise pollution, and air quality.

Every one of these problems, which are without sufficient mitigation before this development, would be substantially worsened were it to be approved. In particular, with its proximity to Black Park, I worry about the damage to nature caused by the associated reduction in air quality.

This development would have a significant negative effect on local residents, the local environment, and the pace of development across the south of Buckinghamshire.

Oliver Dowden MP

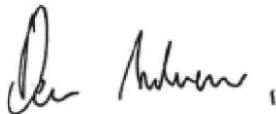
Department for
Digital, Culture,
Media & Sport

Mr Andrew Smith
Corporate Affairs Director
Pinewood Studios,
Pinewood Road
Iver Heath
Buckinghamshire
SL2 4PB

Richard Herbert Dowdon CBE MP
Secretary of State for Digital, Culture,
Media and Sport
4 Floor
101 Parliament Street
London SW1A 2BO

Richard.Dowdon@pm.gov.uk
Richard.Dowdon@pm.gov.uk

?- INT2020/19B30/DC
@ September 2020



I am writing to set out the government's position with regards to both the tourism and film industries.

The government is committed to unlocking and harnessing the potential of the UK film and television sector and its extraordinary array of talent. Taken together it contributes over £4.6 billion per year to UK GDP, reflecting the importance of the sector and its truly global impact.

Our screen industries are high-growth, job-creating, and showcase the best of British creativity and innovation. Major international film franchises including Avengers, Star Wars and the James Bond series are boosting the UK film industry, as well as the wider economy, by bringing investment, creating jobs, and helping film professionals develop new skills which benefit independent productions.

Many of the most popular and globally successful films are shot at Pinewood Studios. Given its hugely important role in leading the way in British film production, I warmly welcome the proposed Pinewood Studios Experience Initiative and its ambition to expand both its site and facilities, driving investment and helping deliver the government's priorities for UK film.

Not only would this proposed development play a vital role in strengthening our creative industries, it would also provide a significant and much-needed boost to our tourism industry at a time when the consequences of the Covid-19 pandemic have been damaging to this crucially important sector.

Our tourism industry employs over 1.5 million people across the UK and we know from attractions like the Harry Potter Studio Tour in Watford or the Dark Hedges in Ballymoney that film and television are significant drivers of tourism in these schemes.



Department for Digital, Culture, Media & Sport

The proposed Pinewood Studios Experience represents a significant opportunity for cementing both Pinewood's heritage and the wider reputation of the UK as a world-class visitor destination.

It is entirely appropriate that local planning decisions are made locally, but I am happy to put on record my support in principle for this exciting proposal, which has the potential to form an important part of this government's work in championing the success story of British film to a global audience.

Parish Council Comments

The Ivers

(Most recent and original comments pasted in full below. Also received: A critique of the Transport Assessment supporting the planning application 16/07/21 and letter 20/02/21 addressed to the highways consultant for that application.)

(26.11.21)

The Ivers Parish Council (TIPC) objects to the application (PL/20/3280/OA) for the development of green belt land to be used for the purposes of a tourist attraction, some film production and limited education usage. Analysis of the scale of the operation shows that this proposal is significantly a proposal to build a tourist attraction with only other limited uses included.

Our objection covers the following areas (in summary) with the detail following:

- The whole of this development falls within the green belt, specifically the Colne Valley Regional Park. This development application does not meet the criteria for development as set out in the National Planning Policy Framework in particular paragraphs 147 and 148, and the application of “very special circumstances”.
- The Ivers Parish area is a designated Air Quality Management Area, additional HGV traffic for the construction phase and ongoing significant traffic during the operational phase will further contribute to poor quality air within the area. There is abundant scientific evidence to prove the negative health impacts of residents of poor air quality. This conflicts with the National Planning frameworks’ policy to promote healthy and safe communities.
- Negative impact on the character of our community, loss of visual amenity, noise and the proposed re-routing of the Peace Path next to the carpark and close to the A412.
- All concerns previously raised in the Parish Councils submitted objection and correspondence on the matter are maintained, in particular note the impact of traffic (congestion) and failure to utilise the agreed traffic measurement approach.
- Adequacy of consultation.

Bat Mitigation and Biodiversity Proposals

We note there is a significant volume of documentation setting out possible actions to protect and promote the local bat population and enhance biodiversity. These actions have not been validated by an independent and knowledgeable authority / expert. Due to the absence of independent evidence the Parish Council cannot consider these proposals fully and must therefore reject their contents. Parish Council recommends that full independent scientific studies are undertaken on these proposals and these are provided to enable consideration and comment. This is the spirit and intent of the planning legislation to allow for informed consultation with impacted parties.

Greenbelt development

The National Planning Policy Framework sets out allowable reasons for development on green belt land. This development application does meet those criteria. There is no case made in the application for the tourist attraction to be at a location next to the existing Pinewood Studio or to be on Green belt land. For example, the visitor attraction can be located at any location. This is evidenced by examples such as the Bond in Motion exhibition which has been held at various locations including London (Covent Garden), Beaulieu Motor Museum and the Petersen Automotive Museum Los Angeles. A further Bond experience is Spyscape HQ which is located in New York. There has also been various Star Wars exhibitions and conventions including locations such as Singapore’s Marina Bay Sands and the Powerhouse Museum in Sydney.

Much of the emerging medical advice, based on learning from the pandemic, shows the benefits of green space to both physical and mental health. Combined with the urgent health need for reduction of emissions in the area it is a fact that a building on this scale would have a significant negative impact on the physical and mental health of the local community. There is also the future impact of built developments on the incidence of dangerous heatwaves which is likely to become an increasing issue with climate change. The proposed building on this scale would have a significant heat absorption effect which will exacerbate this problem and cause further heat related health problems.

Additionally, we note there are currently a plethora of studios being built in the nearby area. The industry is well catered for and further studios will not make any significant advantage to the UK creative industries. Some 32 locations are due to become operational, a number in Buckinghamshire and Berkshire, and more in the nearby London and Counties area. A listing can be found at this URL <https://thestudiomap.com/new-film-tv-studiosunder-construction-in-the-uk/> . Note the content shown at this URL is updated regularly.

The green belt land must not become car parks and a tourist attraction that can readily occur elsewhere as illustrated. This application does not justify a very special circumstance that would allow release of the green belt as per the requirements set out in the National Planning Policy Framework.

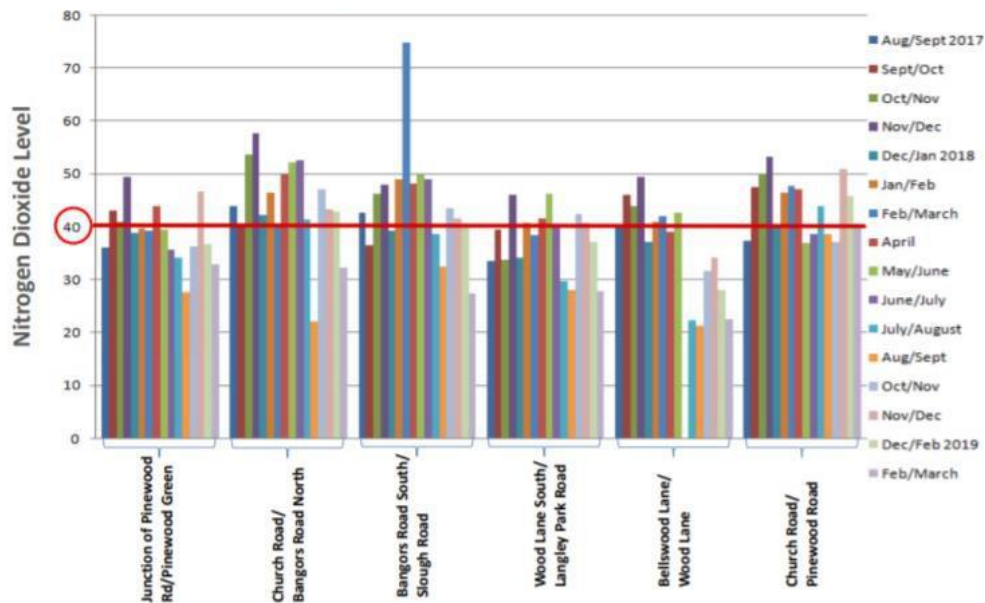
Air Quality Monitoring Area

The Ivers Parish area was designated an Air Quality Monitoring Area in 2018. Monitoring of the air quality shows that the levels of NO₂ frequently exceed the maximum permitted level as agreed. In addition, emerging research is showing that these currently agreed levels are significantly too high and should be lowered to 10µg/m³. (World Health Organisation (WHO), September 2021.)

This development will degrade air quality throughout the construction and operational phases. It will continue to have a negative impact on air quality via loss of mature vegetation and traffic to site. To illustrate our point regarding existing air quality issues please refer to figure 1 (below), which shows the results of the Iver Heath Residents Association monitoring of air quality (2017 -2019). On many occasions 40µg/m³ level has been exceeded and on many more occasions this level is nearly reached. Recently monitoring undertaken during Covid-19 lockdown period (April 2020 to April 2021) show that 4 areas still exceed / nearly exceed the 40µg/m³ threshold. These sites are Junction of Pinewood Road and Pinewood Green; Junction Bangors Road South and Slough Road; Junctions of Church Road and Pinewood Road; Junction of Church Road and Bangors Road North. These areas will be impacted and stressed further as a result of the proposed development.

Applying the WHO recommendation, all sites on all occasions exceed the NO₂ level.

4.2 Results: sites with highest monthly readings



© Iver Heath Residents' Association

- 9 -

February 2020

Poor air quality has a negative impact on health, including the shortening of life expectancy and can be a cause of death. Please refer to the Coroners findings (2020) in the tragic death of a young girl, Ella Kissi-Debrah. The Ivers Parish Council is deeply concerned that the poor air quality impacts both residents and workers at Pinewood Studios, as all have long term exposure.

Negative impact on the character of our community, loss of visual amenity. noise and facilities

The Screen Hub UK – visitor centre equates to a possible in excess of three million (3,000,000) visitors per annum as per the initial development plans. The site also includes capacity to expand without recourse to further planning applications. The area, that bridges the proposed new production studio and the visitor centre, is described as being available as needed. Thus, expanding capacity with ease. We also note that as this application is “Outline” it is possible for the applicant to change the land use and indeed the whole site become developed to a theme park and related services.

The site is clearly visible by the public, the establishment of industrial buildings is at the detriment to the visual amenity. The proposed development is over-bearing, out-of-scale or out of character in terms of its appearance compared with existing development in the vicinity. The design and materials used to recently construct other parts of Pinewood Studios are all industrial materials and industrial look. The design is based on a series of warehouse style buildings. The (Emerging) Ivers Parish Council Neighbourhood Plan 2021 describes Iver Heath as “The character is predominantly suburban within a landscape setting of agricultural fields, paddocks and woodland. Agriculture and horticulture are also important elements of the local economy” (section 2.10).

Policy 14 sets out the design for Iver Heath which includes the following: “The Neighbourhood Plan identifies an Area of Special Character comprising The Parkway, Longstone Road, Church Road (north side) and Ashford Road,” These areas are immediately adjacent to and nearby the proposed development site.

The Neighbourhood Plan further states, “Development proposals that have effects for this area should demonstrate that they have had full regard to the characteristics that contribute to its

significance, including the contribution of its local architectural and historic interest as set out in the design code ...”

Residents will also experience increased noise associated with the construction and operation of this site. The site will operate 24/7 as a film studio and the tourist attraction will see visitors arrive from 8.30am or earlier and leave at 21.00. Outside these times the staff will of course come and go from the site. The traffic and operational noises will be a constant through the hours when residents wish to be enjoying their own and community outdoor spaces.

The population of the Ivers Parish area is approx. 12,000 people. This means that on any given day the visitors alone coming to the tourist attraction nearly double the population.

Adding to this daily influx of visitors is workers in the tourist attraction, workers at the Studio, which includes regular surge volumes due to the use of “extras” for scenes.

The adjacent areas are predominately built in the 1930s and this character is noted in the Emerging Neighbourhood Plan with the view to this being preserved. The sizable development of modern industrial buildings and massive influx of people on a daily basis has the potential to destroy the neighbourhood character.

The development application proposes re-routing the Peace Path. This is a historic permissive path. The re-routing destroys the historical connection. The current location of the path is also convenient to residents, so that it encourages walking to the path and then along it to Black Park. Re-routing puts this healthy and environmentally friendly activity at risk. The path also would be routed next to a car park and close to the A412 – this would adversely impact the tranquillity of the path and the enjoyment by users.

Adequacy of consultation

This revised application was lodged on 26 October and the closing date for comments set at 28 November 2021. Then on 15 November a further significant number of documents have been added, effectively limiting the consultation to a little over a week. The planning documents are also “outline”, which provides indicative details only. We also note the practice for limited documents to be available on the Buckinghamshire planning portal website at times. For example, the weekend 20 and 21 November only the most recent documents were able to be viewed. This has a detrimental impact on the community who want to read the documentation and to provide informed comment.

A development of this size and impact in a local area requires extensive and inclusive consultation and community engagement. This simply has not occurred.

Previous concerns raised by The Ivers Parish Council

The Ivers Parish Council provided an objection to the development application in November 2020 and provided further comments in July 2021 (2 documents). The issues noted in these documents have not been addressed by the recent updated development documents.

Therefore, Parish Council stands by these documents and adds this document as further objection to the development application.

Parish Council provided a critique in July 2021 (documents referenced above) which shows all critical roads and junctions in the surrounding area will exceed or are currently exceeding capacity. The development application continues not to address this fundamental issue.

The traffic and resultant emissions in turn impacting on the health and quality of life of residents and indeed workers at Pinewood Studios. All parties will have prolonged exposure to poor air quality.

Parking in the area is already stressed and the earlier documents lodged by Parish Council refer to this. Below are images taken in May 2021 and November 2021 showing the current weekday parking situation. Workers simply are not provided with sufficient on-site parking and flood the local narrow streets. The parking identified in the proposed development would only cater, at best, for the activities in that area, and the current issue remains.

Further we understand that if the application is approved it is Pinewood Studios intention to charge for parking on the site. As a result, more people (workers and visitors) would look to park on local streets as an alternative. Residents parking schemes are not effective given the proposed prolonged hours of operation. Why should residents need to pay for the permits needed when a residents parking scheme is introduced? This passes an unfair burden to the local community.



Pinewood Green and Pinewood Road May 2021



Pinewood Green and Pinewood Road 22 November 2021 9.30am

The development application makes broad claims regarding economic benefits. These claims have not been validated by a recognised expert. Further the application does not include any “benefits realisation” monitoring which is a key aspect of effective programme governance. Put simply, claims for benefit are being made, but there is no offer to track they are delivered and implication to the developer if the benefits are not delivered.

We also draw to your attention the United Nations Sustainability Goals in particular SDG 15, “life on land”. This goal asked member states to protect, restore and promote sustainable use of terrestrial ecosystems and halt and reverse land degradation and biodiversity loss.

This development proposal is in direct conflict with goal 15. The National Planning Policy Framework makes explicit reference to and links with the United Nations Sustainability Goals, thus making them factors to be included in the determination of planning applications.

To restate our position, The Ivers Parish Council objects to this application. As required, we have set out a range of mitigations should Buckinghamshire Council be minded to approve this development. These have been set out in our original objection to the application when first lodged.

In addition, we note that mitigations should include fully funded emergency services stations to be provided in the immediate area. The Ivers Parish area does not have a station / base for Police, Ambulance or Fire. Doubling the population, on a daily basis, generates risk and requires ready access to emergency services. Additional sound stages also increase the risk of significant workplace accidents and the need for emergency services to be able to respond quickly. During the week commencing 15 November 2021 Pinewood Studios experienced 2 major incidents, each requiring in excess of 5 fire crews to attend, plus police and ambulance. This development and previously approved development are increasingly close to existing residential buildings and natural greenbelt land – the risk for spreading fire is enormous.

The Ivers Parish Council objects to this application.

(18.11.20)

The Ivers Parish Council objects strongly to the outline plan for further expansion of Pinewood Studios in Iver Heath

- The very special circumstance of co-location, claimed for building in the green belt, is not substantiated. There are other Pinewood Studios, both in the UK and in other countries:-
- “In the last 10 years, the Pinewood brand has been exported to studios in Toronto, Canada; and the Dominican Republic.” (Pinewood website)
- Screen Hub UK could be located on any non-green belt, ex commercial/retail park site that is now empty. Co-location is not a necessity. Pinewood Studios previously built a visitor experience in Cardiff Docks. The national employment argument might appear sound at the moment during the current Covid-19 pandemic but things will be different by the time this is proposed to be operational. Also, the local employment data do not support national data.

(ONS April-June 2020 16-74yrs

UK employment 76.4% unemployment 3.9% inactivity 20.4%

SE employment 79.7% unemployment 3.3% inactivity 17.5%)

1. Green belt

Losing 33 hectares of green belt is shocking. The now withdrawn Local Plan, in reviewing green belt boundaries, drew Pinewood Road as a defensible boundary for green belt and now that is being ignored.

If permitted, this development will fail on three of the five purposes of Green Belt land, defined in the NPPF:-

Clause 133. 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.

Clause 134. Green Belt serves five purposes;

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;

- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and
- f) other urban land.

This application fails on;

- a) to check the unrestricted sprawl of large built-up areas;
- b) to assist in safeguarding the countryside from encroachment;
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It could be argued that Black Park deserves protection under d)

Clause 144. Refers to inappropriate development in the Green Belt and that 'very special circumstances' will not exist unless harm to the Green Belt is "clearly outweighed by other considerations."

Harm to the Green Belt is not clearly outweighed by the circumstances presented.

2. Colne Valley Regional Park

The aims of the CVRP are:-

1. To maintain and enhance the landscape
2. To safeguard the countryside
3. To conserve and enhance biodiversity
4. To provide opportunities for countryside recreation
5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. To encourage community participation

This application fails on;

3. The claimed biodiversity net gain does not take account of the effect on Langley Park, Black Park and their interconnectedness for wildlife. Such a massive and disruptive operation will be detrimental to the ecology and wildlife of the area. This is further fragmentation of already fragmented green belt and the Colne Valley Regional Park.

5. Removing 33 hectares of land from farming production is contrary to the aims of the CVRP CIC. The site has been restored to agricultural land that has been successfully farmed as the restoration phases were completed over the last fifteen years.

Apart from the CVRP aims; at this stage in the UK departure from the EU, concern about food security and climate change more generally, to build over productive farmland is misguided.

3. Excessive traffic generation

8,500 visitors per day and 3,500 employees is a huge number of people using the local roads and transport.

The road improvements proposed are too localised and will not deal with the anticipated additions to the vast amount of traffic already passing through the Ivers on a daily basis. The impact assessment does not look at the whole area where there is significant existing traffic passing through The Ivers to and from the M4 and M40/M25. Pinewood Studios' own consultants' report on existing traffic flows shows local roads in Iver Heath are already at or above capacity. The modest changes to local road layout would not compensate for the anticipated increases in traffic associated with the visitor centre. Local residents live with the daily congestion and associated atmospheric pollution. Desktop modelling of future trends ignores the reality of the situation.

There is potential for more rat-running unless measures are taken to prevent it; this then inconveniences residents who can no longer use local routes.

It is unacceptable for green belt land to simply be used for large car parks. Off-site car parking on a remote brownfield site close to the motorway network should provide park and ride serviced by electric vehicles.

4. Long term environmental effects on quality of life for the community.

Traffic

Poor air quality

Light pollution

Noise pollution

Visual intrusion

5. Reduction in biodiversity

Black Park will be harmed by visual intrusion, noise, air and light pollution and pressure from a large increase in visitor numbers. All will contribute to reduction in biodiversity in the wider area.

6. Design

The existing expanded studios indicate the style and design of sound stages and workshops. These are not capable of any mitigation for the bulk and ugliness of the structures. Bunds introduce further alien features and planting takes years to mature. The proposed planting will not be able to screen the high buildings and the visual impact on the openness of the green belt remaining on either side will be considerable.

7. Peace Path

A well-used, ancient permissive path will be removed. It is located in a position easily accessible to a large number of residents in Iver Heath without the need either to use a car, or face traffic walking to and from the entrance to Black Park.

Replacement by a route through a car park that connects neither with Footpath IVE/4/2, nor the majority of residents is not acceptable.

8. Climate change

The introduction of such a large number of vehicles into one location flies in the face of the Buckinghamshire Council's climate change target to work with partners to reduce net carbon emissions as soon as possible

9. Impact on community and residents

The effect of 'an international visitor attraction' on The Ivers will increase demand for apartments to rent out. The house building that may result in The Ivers will not benefit local people who need homes but those who sub-divide properties or buy to let. This affects community cohesion and local engagement for the long term.

This additional development will enclose more of Iver Heath village by the Pinewood Studios Estate, which will dominate the village. This will have a significant negative impact on the sense of wellbeing.

The continuing disturbance from construction activities, following 15 years of disturbance from aggregate extraction and restoration of this site is unacceptable for residents.

Construction management would need to be robustly managed and planned with agreed hours of work included and HGV movements planned in advance.

There is a suggestion for a levy on ticket prices which would provide a fund for on-going support to the local community and to mitigate problems which arise after the complex is fully occupied. This needs to be more specific. It may be ten years before the complex is fully occupied, problems cannot be anticipated in full from the materials provided and the fund is unpredictable.

In the event that IPC's objections (representing those of large numbers of local residents) are overruled and planning permission is granted, it is imperative that such permission should include the following conditions:-

10. Traffic Routing Condition

Route via Seven Hills Road to be clearly signed for all Pinewood traffic to/from A412 north and M40.

Pinewood Green to be protected from Studios traffic by a means acceptable to residents.

Clear signage for routing of traffic to avoid all the local villages.

Residential roads protected against becoming 'rat runs' to any part of the Pinewood Studios sites. This is an existing issue.

Residents' parking scheme to be implemented in Pinewood Green estate with funding for effective enforcement to prevent staff and visitor parking.

Speed control and monitoring in Church Road and other local roads.

Existing shuttle bus service to be re-routed to stop in other areas of Iver Heath.

11. The development should include:-

Renewable energy provisions.

Electric shuttle buses .

Green roofs on buildings

The site should have a sustainable energy source:-
solar, heat pump

S106 Asks

- Green belt mitigation

The provision of Alderbourne Farm as mitigation is not sufficient given that it is already open green belt land. It is remote from residents and unless new rights of way are agreed with Bucks, to connect with those existing in The Ivers, will be of little benefit to the community. Thorney Park should be provided in mitigation as a well used site, closer to the community. These provisions must be held in perpetuity.

- Bridge connection from Black Park to Langley Park.
- Continuing the cycleways provision especially the link to Iver Station
 - improvements to High Street/Thorney Lane North and South.
- Upgrade Wood Lane for cycles and footways.
- Contribution to Iver Relief Road.
- Contribution to the delivery of The Ivers Air Quality Management Plan.
- Provision of acoustic mitigation to local affected residents.
- A payment of £500,000 to the Ivers Parish Council for the improvement and maintenance of open spaces in The Ivers.
- Payment of £500,000 to the Ivers Parish Council for improvement and upkeep of community buildings.
- A significant number of the proposed apprenticeships/training schemes must be reserved for local people...or offered for a set period to local people, say 3 months.
- A number of the business units to be available at a reduced rate for social enterprises in perpetuity and to local start-up and other small and medium sized businesses for up to 3 years

at significantly reduced rates.

- Electric bicycle scheme linking Pinewood to Thornbridge Rd shops, Iver Village and station
- Fund an integrated ANPR/CCTV system to provide coverage of The Ivers Parish. This would cover all entry and exit points and be extended to named residential roads. Access to footage would be compliant with all relevant legislation. The scheme mirrors the approach taken by the Smartville projects run by community groups and these groups could manage the project once delivered.

Also expect to see a contribution to additional local policing (to be requested by TVP)

Fulmer Parish Council

(15.11.20)

Fulmer Parish Council objects to this proposed outline development on the following five grounds.

1. Transport The traffic modelling for this development is built on the Seven Hills Road improvement which was itself tightly drawn with a focus on Five Points Roundabout and stopped at the end of Fulmer Common Road. No modelling has been done on impact of traffic through Fulmer village vs through the back lanes, both of which have significant ongoing safety concerns which additional traffic from this development will exacerbate. The proposed development would be contrary to the requirements of paragraph 109 of the NPPF in that it would result in an unacceptable impact on highway safety. Discussions are continuing with the applicant with a view to determining a package of highway safety improvements that would mitigate the impact of the development and enable the above objection to be withdrawn.

2. Greenbelt objectives - special circumstances The proposed development will impact the openness of the Greenbelt. The applicant puts forward very special circumstances purport to be impressive wider economic benefits - however these are not substantiated and not within the applicant's control or gift. A figure of 3,500 new jobs is quoted, but with only 1,438 on site – and none of these guaranteed. We are awaiting further detail from the applicant about the economic benefits which were claimed for the PSDF application and those which have emerged, to assess what weight can be attached to these economic forecasts. The special circumstances further assert that the experience cannot be located anywhere other than this crowded corner of the UK. This is made without evidence and on the face of it, the Disney brand has successfully located a number of large tourist attractions a long way from its studios. If the economic benefits are great, has consideration been given as to whether more deprived regions of the UK should share the benefit, particularly those more badly hit by economic withdrawal than South Bucks. We would welcome further input from the applicant to substantiate the claims of special circumstances.

3. Greenbelt objectives - prevention of coalescence In addition to the general protection of openness, one of the explicit objectives of Greenbelt policy is to prevent neighbouring towns from merging into one another. The test for special circumstances for development of land that both removes openness and causes town to coalesce should be more stringent than that of openness alone, with a strong presumption against development. This development would see considerable built mass extending from Iver all the way to Fulmer, creating a coalescence of the dwellings, with only the site of Alderbourne Farm separating them. With no condition on the development of Alderbourne Farm, this application would see the two settlements lose their distinctive identity. The special circumstances claimed would not outweigh this considerable permanent damage to the Greenbelt.

4. Reduction in biodiversity and environmental impact The application makes note of the low current biodiversity of the recently used quarry site. However, the planning requirement on the quarrying

required that it was returned to its natural state and allowed to heal. In planning terms, therefore, the appropriate baseline is the impact once the existing condition is discharged. Therefore, the biodiversity impact should not be measured from the current depleted state but from a baseline of the forecast state of a site returned to nature. Given the site's proximity to Black Park, this is likely to be significantly higher than currently, showing a much larger biodiversity impact from the development, unless a significant and equivalent area is dedicated to vastly enriching the biodiversity of the area. Discussions are continuing with the applicant with a view to determining a package of environmental improvements on the Pinewood estate that would mitigate the impact of the development on points 3 and 4 and enable the above objection to be withdrawn.

5. Environmental impact The NPPF requires development to be sustainable. This application raises a number of sustainability issues: - i) proximity of large built masses to Black Park Country Park and SSSIs therein. ii) times of operation of visitor attraction planned to be late into the evening in summer months. iii) excessive light and noise pollution late into the evening and night from studio facilities and ScreenHub affecting both local wildlife and neighbours.

Wexham Parish Council
(26.10.20)

I write to advise you of Wexham parish council's comments to this application. The comments are: Wexham Parish Council object to this planning application as it goes against many of the Local Planning Policies and their own Planning Statement. For example, the local road system according to their planning statement, they say that the roads are capable to handle the number of cars that would be expected and be below capacity on a single-way carriageway. With an expected 10k cars a day on the roads, it is obvious that there will be an impact, as can be seen every day at Thorpe Park and Lego Land when they are open, the roads are jammed full of traffic on closing. It is clear that the volume of traffic generated along with the everyday traffic has not been taken into consideration when writing their statement and would put the public along these roads in severe jeopardy if walking the roads. Rural lanes would no longer be rural and would become major rat runs for the Pinewood Traffic.

The Planning Policy E2, identifies the site as for Film Studio Use and that any new buildings will be for film production or associated industries. 10.18 states that if they are considering redeveloping the site, the Council will need to know that the Studio is no longer viable or required. Whilst it can be seen that the Studio is still required and needed, it begs the question as to what these buildings would be used for. Whilst their Local Plan agrees that the Film Studio's in the unique site is extremely desirable, section 10.18 states that any new uses at the site should reflect the existing permanent employment and any redevelopment or re-use could result in substantial intensification of employment and the site is not well located to public transport. 10.19 goes as far to say any redevelopment of the site there should be a reduction in the footprint to encourage substantial landscaping to form part of any development. Green Belt policy dictates that planning permission will not be granted for development other than a change of use of existing buildings, or unless it's for use of Agriculture or Forestry. Neither is it for any form of outdoor recreation or mineral extraction, in accordance with the Bucks Minerals Local Plan, or a Cemetery.

Stoke Poges Parish Council
(27.10.20)

Stoke Poges Parish Council would like to submit comments regarding the above Outline Planning Application. Our proximity to three major motorways which are extremely congested means that surrounding villages are already used by a high volume of cars taking short cuts to avoid traffic. With a proposed extra 2 million visitors to this attraction we can only conclude that this will mean even more

traffic using our lanes. If this application is granted we would like to request that Stoke Poges is included in any financial mitigation.

Consultation Responses

Natural England

(23.10.2020 and 23.11.21)

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would:

- damage or destroy the interest features for which Black Park Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- A Construction Method Statement as mentioned within the Environmental Statement Vol 1 Part 1/2 (September 2020) must be produced, agreed and implemented prior to commencement of work on site.
- The construction of a large development close to the SSSI boundary could cause pollution, dust, disturbance and other impacts upon the site. The following measures must be assured for future developments to ensure the impacts is minimised:
 - No materials, machinery or work should encroach onto the SSSI either before, during or after demolition, construction or ongoing use; and
 - No pollution from demolition or construction of the development must adversely affect the SSSI and a Construction Method Statement demonstrating how best practise will be used to minimise dust etc. must be submitted to, and approved in writing by the Local Planning Authority. All works must then proceed in accordance with the approved statement with any amendments agreed in writing.
 - The CMS should ensure works to habitats that support nesting birds are undertaken outside of the nesting season (March – September inclusive).

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Further advice on mitigation

- The Construction Management Plan should detail how certain activities will be limited in time, location or noise level to minimise the risk of disturbance to ground nesting birds. An Ecological Clerk of Works (ECOW) should be present on site to assess habitat suitability for ground nesting birds should works take place between March and September.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

In addition, Natural England would advise on the following issues.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

Natural England welcome the delivery of a minimum of 10% biodiversity net gain on site as set out in the Biodiversity Net Gain Report carried out by LUC in the Environmental Statement Vol 2 Part 6. We would expect to see species rich hedgerows retained where possible. Further advice on environmental enhancement is provided in Annex A.

Local sites and priority habitats and species

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

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#).

<https://webarchive.nationalarchives.gov.uk/ukgwa/20140712055944/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our Discretionary Advice Service.

If you have any queries relating to the advice in this letter please contact me on 07899902408.

We would be pleased to provide advice on the discharge of planning conditions or obligations attached to any planning permission to address the issues above.

Should the proposal change, please consult us again.

Environment Agency

(Amended comments received 12.02.21 pasted below, original comments received 29.10.2020).

We have removed our previous objection and are providing advice. We are now satisfied that the applicant is aware of the potential issues with the existing permit on site and that this can now be dealt with through the appropriate permitting regime.

We have not requested any conditions on site despite the presence of the historic landfill as this site is located in a source protection 3 and unfortunately due to resource issues we now only condition those sites in the most vulnerable groundwater areas which pose the greatest threat to the environment. That being said, we would encourage the local authority to ensure suitable protections are in place.

Should you have any queries regarding this response please feel free to contact me.

In our previous correspondence (our letter ref: NE/2020/132401/01-L01, dated 29 October 2020), we objected to the proposed development because we were not satisfied that sufficient information had been supplied to demonstrate that the applicant had fully considered our requirements for the surrender of the Environmental Permits on the site prior to development.

In the subsequent months we have engaged in constructive discussions with the applicant and Buckinghamshire Council with regards to our outstanding objection.

We are now satisfied that the applicant has given due consideration to the existing environmental permits on site, and the risks posed by the proposed development to vulnerable groundwater and the landfill mass.

As a result, we are now in a position to remove our objection to the outline planning application as we are satisfied that the risks posed by the proposed development to groundwater and the landfill mass can be managed through our permitting regime.

As environmental regulators we have to ensure that planning and permitting, although separate regimes, can be complimentary where we have complex applications which affect both regimes. We are now satisfied that the risks to the environment posed by the development are best considered through an environmental permit application to amend the final land use and the landfill infrastructure. There may be design requirements which result from this application but these can be integrated into future reserved matters applications.

We request that we are consulted on any amendments to the outline application and all reserved matters.

Please give consideration to the following advice regarding groundwater and contaminated land, waste and water resources.

Groundwater and Contaminated Land

The previous land use at this site as a landfill suggests the presence of contamination. Since the site is situated in a vulnerable groundwater area, located partially within Source Protection Zone 3 and located on a secondary A aquifer, these proposals need to be dealt with in a way which protects the underlying groundwater.

Advice to Applicant/LPA

We recommend that the requirements of the National Planning Policy Framework and National Planning Policy Guidance are followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. We expect reports and Risk Assessments to be prepared in line with our Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM). LCRM is an update to the Model procedures for the management of land contamination (CLR11), which was archived in 2016.

In order to protect groundwater quality from further deterioration:

- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution (e.g. soakaways act as preferential pathways for contaminants to migrate to groundwater and cause pollution).
- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.

The applicant should refer to the following (non-exhaustive) list of sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

1. Follow the risk management framework provided in the updated guide LCRM, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information we require in order to assess risks to controlled waters from the site. The Local Planning Authority can advise on risk to other receptors, such as human health.
3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. The Planning Practice Guidance defines a "Competent Person (to prepare the investigation information) as: A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation." For this definition and more please see here.
4. Refer to the contaminated land pages on Gov.uk for more information.
5. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by contamination e.g. British Standards when investigating potentially contaminated sites and groundwater, and references with these documents and their subsequent updates:
 - BS5930:2015 Code of practice for site investigations;
 - BS 10175:2011+A2:2017 Code of practice for investigation of potentially contaminated sites;
 - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;
 - BS ISO 5667-11:2009, BS 6068- 6.11: 2009 Water quality. Sampling. Guidance on sampling of groundwaters (a minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns but more may be required to establish the conceptual site model and groundwater quality. See RTM 2006 and MNA guidance for further details);
 - BS ISO 18512:2007 Soil Quality. Guidance on long-term and short-term storage of soil samples;
 - BS EN ISO 5667:3- 2018. Water quality. Sampling. Preservation and handling of water samples;
 - Use MCERTS accredited methods for testing contaminated soils at the site;
 - Guidance on the design and installation of groundwater quality monitoring points
 - Environment Agency 2006 Science Report SC020093 NB. The screen should be located such that at least part of the screen remains within the saturated zone during the period of monitoring, given the likely annual fluctuation in the water table. In layered aquifer systems, the response zone should be of an appropriate length to prevent connection between different aquifer layers within the system.

A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out. This increased provision of information by the applicant reflects the potentially greater risk to the water environment. The DQRA report should be prepared by a "Competent Person" e.g. a suitably qualified hydrologist. More guidance on this can be found at: <https://sobra.org.uk/accreditation/register-of-sobra-risk-assesors/>.

In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.

Further points to note in relation to DQRAs:

- GP3 version 1.1 August 2013 provided further guidance on setting compliance points in DQRAs. This is now available as online guidance: <https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments>
- Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50 metres.
- For the purposes of our Approach to Groundwater Protection, the following default position applies, unless there is site specific information to the contrary: we will use the more sensitive of the two designations e.g. if secondary drift overlies principal bedrock, we will adopt an overall designation of principal.

Where leaching tests are used it is strongly recommended that BS ISO 18772:2008 is followed as a logical process to aid the selection and justification of appropriate tests based on a conceptual understanding of soil and contaminant properties, likely and worst-case exposure conditions, leaching mechanisms, and study objectives. During the risk assessment one should characterise the leaching behaviour of contaminated soils using an appropriate suite of tests. As a minimum these tests should be:

- Up-flow percolation column test, run to LS 2 - to derive kappa values;
- pH dependence test if pH shifts are realistically predicted with regard to soil properties and exposure scenario;
- LS 2 batch test - to benchmark results of a simple compliance test against the final step of the column test.

Following the DQRA, a Remediation Options Appraisal should be completed to determine the Remediation Strategy, in accordance with the updated guide LCRM.

The verification plan should include proposals for a groundwater monitoring programme to encompass regular monitoring for a period before, during and after ground works e.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period. The verification report should be undertaken in accordance with in our guidance Verification of Remediation of Land Contamination.

We only consider issues relating to controlled waters (groundwater and watercourses). Evaluation of any risks to human health arising from the site should be discussed with the relevant local authority Environmental Health Department.

Deep Borehole Soakaways

Infiltration via deep borehole soakaways are not acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated.

In line with position statement G9 in The Environment Agency's approach to groundwater protection (formerly GP3) we would usually only agree to the use of deep infiltration systems for surface water if you can demonstrate the following:

- There are no other feasible options such as shallow infiltration systems or drainage fields/mounds that can be operated in accordance with the with the appropriate British standard (e.g. discharge to a shallow infiltration system, surface water or sewer);
- The system is no deeper than is required to obtain sufficient soakage;
- Acceptable pollution control measures are in place;

- Risk assessment demonstrates that no unacceptable discharge to groundwater will take place;
- There are sufficient mitigating factors or measures to compensate for the increase risk arising from the use of deep structures.

The above should be read in conjunction with the position statement G1. Please note that we cannot issue an Environmental Permit for the direct discharge of hazardous substances into groundwater.

G1 - Direct inputs into groundwater

The Environment Agency must take all necessary measures to:

- Prevent the input of any hazardous substance to groundwater;
- Limit the input of non-hazardous pollutants to groundwater so as to ensure that such inputs do not cause pollution of groundwater.

The Environment Agency will only agree to the direct input of non-hazardous pollutants into groundwater if all of the following apply:

- It will not result in pollution of groundwater;
- There are clear and overriding reasons why the discharge cannot reasonably be made indirectly;
- There is adequate evidence to show that the increased pollution risk from direct inputs will be mitigated.

Please refer to our Groundwater Protection webpages for further information.

Waste on-site

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- The position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on gov.uk

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste -

Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear.

If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Water Resources

Advice to Applicant

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Forestry Commission

27/10/20

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

- Details of Government Policy relating to ancient woodland
- Information on the importance and designation of ancient woodland Ancient woodlands are irreplaceable.

They have great value because they have a long history of woodland cover. It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons[1] and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 175). We also particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and Case Decisions.

As a Non Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understory (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
- damaging archaeological features or heritage assets

It is therefore essential that the ancient woodland identified is considered appropriately to avoid the above impacts.

Planning Practice Guidance emphasises: ‘Their existing condition is not something that ought to affect the local planning authority’s consideration of such proposals (and it should be borne in mind that woodland condition can usually be improved with good management)’. If this application is on, adjacent to or impacting the Public Forest Estate (PFE): Please note that the application has been made in relation to land on the Public Forest Estate and Forestry England, who manage the PFE, is a party to the application.

They therefore should also be consulted separately to the Forestry Commission. If the planning authority takes the decision to approve this application, we may be able to give further support in developing appropriate conditions and legal agreements in relation to woodland management mitigation or compensation measures. Please note however that the Standing Advice states that “Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal”.

We suggest that you take regard of any points provided by Natural England about the biodiversity of the woodland.

This response assumes that as part of the planning process, the local authority has given due regard as to whether or not an Environmental Impact Assessment is needed under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 or the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended. If there is any doubt regarding the need for an Environmental Impact assessment (Forestry).

We would also like to highlight the need to remind applicants that tree felling not determined by any planning permission may require a felling licence from the Forestry Commission.

BPA Pipelines

(29.11.21)

Thank you for the consultation regarding the above planning application. The proposed works are in close proximity to 2 high-pressure fuel pipelines and BPA wish to ensure that any works in the vicinity of the pipeline are carried out in accordance with our safety requirements (www.linewatch.co.uk). Please find attached a GIS map of our pipeline(s) in relation to the above application.

BPA wish to request that the application is held in abeyance until we have discussed the proposal in more detail with the developer. Unfortunately we are awaiting a date from the developer.

Based on the plans provided BPA request an informative that the owner/developer must liaise with BPA and gain our consent for any construction within the pipeline easements before the site works commence. The proposed ponds running along the western boundary of the site must be kept outside of the pipeline easement and their presence must not prevent BPA from being able to gain access to the pipelines in future (e.g destabilising a parallel excavation).

The proposed road and bellmouth to the south-west of the site may interact with the pipeline easement and may require the pipelines to be inspected and suitably protected.

The most important points are:

These Pipelines carry refined petroleum at extremely high pressure.

Any construction must be kept a minimum of 6m from the pipelines.

All excavations (including hand trial holes) within 6m of the pipeline must be approved and supervised by BPA.

The exact location of the pipeline to be marked by BPA in consultation with the developer prior to detailed design.

Nominal cover is only 0.9m (3').

Normal vertical clearance for new services is 600mm.

These pipelines are protected by cathodic protection and you should consult with BPA if you are laying any services (with or without cathodic protection).

Heavy vehicular crossing points to be approved before use across the easement.

Tree planting is prohibited within the easement.

No buildings can be located within the pipeline easement.

No lowering or significantly raising of ground level throughout the easement.

A continuous BPA site presence will be required for works within the easement.

Utility crossings may require a formal crossing consent

BPA do not charge for the first three days of supervision (this includes site meetings). After that, BPA will charge for any future supervision.

When planning works which involve crossing or working within the easement of the pipeline, the following will be requested before works can start:

A confirmed or proposed programmed start date for the works

A detailed description of the proposed works

A plan of the work area,

Drawings and a method statement for the written approval of BPA.

Buckinghamshire Highways DM

(06.07.21)

This response follows the previous response provided by this office with reference to the above application. In that previous response it was presented that there were the following considerations that were outstanding to be resolved before being able to provide final comments and suggested conditions that the Highway Authority would seek to provide.

Since that time considerable work has been undertaken between the Highway Authority and the applicants to resolve those outstanding issues and this response will seek to summarise the conclusions of those discussions and the final position that the Highway Authority is now able to take with respect to this application. It is not the Highway Authorities intention to seek to revisit matters that have been previously addressed, as such this response should be read in conjunction with my previous response dated 23rd December 2020.

As such, the matters that this response shall address are as follows;

- The results of parking surveys on Pinewood Green;
- The results of the sensitivity tests for the traffic modelling;
- The results of the potential adjustments to improve pedestrian facilities at Five Points Roundabout (FPR);
- Securing sustainable travel to the site and the Framework Travel Plan;
- S106 obligations; and
- Access and parking matters relating to Black Park.

The Highway Authority has reviewed the results of the Pinewood Green parking survey and are satisfied that the results of this survey demonstrate that the parking that is taking place on Pinewood Green is not related to the operation of Pinewood Studios. This therefore stands to reason that further development at Pinewood Studios would not result in increased parking in this area. Additionally the quantity of parking provision on site has been further reviewed against the justification provided and it has been demonstrated that the spaces are required to facilitate proper operation of the site.

With respect to the revisions requested to the design of Five Points Roundabout the applicants have considered the Highway Authority's concerns regarding pedestrian experience and have been able to present an improvement to the crossing of the A412 Church Road. The Highway Authority accepts that the limitations of the site do not allow further improvements or refinements to the design and now consider the drawing ITL16184-GA-016 Rev A to be the drawing that shall be taken forward as the approved scheme to be presented for a subsequent planning permission to enable these proposals to be mitigated sufficiently should planning permission be granted.

The Framework Travel Plan (FTP) has been revised and greater certainty has been provided to the Highway Authority that the measures contained within it are achievable and the commitments made shall be delivered. It remains the case that at each reserved matters application a detailed Travel Plan (TP) will need to be submitted. The FTP however sets out how the suite of TP's shall fit together and be governed through the TP steering group. The Highway Authority is satisfied that the FTP sets out an ambitious and achievable set of sustainable travel targets that is to be secured for this application to ensure that the impact of development on the local highway network is acceptable. It is however essential that the applicants commit fully to the proposals presented. To support this and ensure that the targets are to be met the applicants and the Highway Authority have agreed a Travel Plan Mode Share Incentive Scheme (MSIS). This provides a mechanism for which mode share is monitored with respect to the visitor attraction element with financial penalties which will be payable should those targets not be met. Any such payments are to be used for measures to improve air quality in the local vicinity through sustainable transport measures, up to a maximum value over the life of the MSIS of £750,000. I am satisfied that this can be secured through a combination of conditions and S106 obligations.

Against the background of very limited public transport provision in the immediate vicinity of the site, in order to offer a genuine choice of transport modes and maximize sustainable transport solutions the proposals for bus and coach travel are essential. The Highway Authority stress that whilst the FTP

and the MSIS documents represent measures and controls that are to be secured and monitored for a limited time period, and any subsequent measures with detailed reserved matters travel plans would also be subject to monitoring for a fixed duration, those travel plans and their objectives must be retained and maintained for the whole life of the uses on the site that this application seeks to permit. Elements such as the bus service to Slough and the studio shuttle buses form a key part of this application in securing mode share and therefore the defined impact on the highway network. It is therefore essential that these are secured.

It is understood that discussions have continued regarding the relocation of the Peace Path that runs through the site. My colleague in the Strategic Access team is leading on this matter and shall provide further comments.

Since the initial response the applicants have undertaken sensitivity testing of the network in order to demonstrate the highway impact should the assumptions regarding the mode share prove to be less favorable. This is important given the major development proposed to ensure a thorough assessment and enable the Highway Authority to secure appropriate mitigation. As such, the sensitivity test modelled further scenarios using an increase in private vehicle trips to the site. The result of this was to have a 75% mode share by private vehicle (the Transport Assessment is based on 60% private car). The results of this sensitivity test demonstrate that with the proposed mitigation, the junctions within the highway network assessment remain operational without severe impact, and those that operate over capacity remain less so than the situation without the development and the associated mitigation.

In relation to the sensitivity testing a question was raised by Iwer Parish Council that further sensitivity testing be carried out in relation to concerns that are held locally regarding the impact of the Strategic Road network and junctions outwith the current assessment area. This has been considered and there is not evidence of significant impacts and traffic increases outside the existing study area. The Highway Authority remains satisfied that the assessment that has been carried out and the results provided represent a comprehensive and robust assessment of the impacts of the proposed development.

The Highway Authority also is aware of concerns being raised by Stoke Poges PC regarding traffic impacts in Stoke Poges and areas to the west of the site. Similarly, following further consideration of the numbers of traffic movements and associated distribution of vehicle trips in these areas it was found that mitigation is not required in this area.

Following engagement between the applicant and Fulmer Parish Council, the applicant has advised the Highway Authority that they have agreed a contribution of £150,000 towards traffic calming schemes within the Fulmer area. The Highway Authority is satisfied that this can be secured through a S106 agreement to deliver some or all the works set out in note JCB/ITL16184-039B TN. In reviewing the traffic impact, it is demonstrated that there is an increase in traffic through Fulmer village, and whilst not a severe congestion impact, there are a number of areas within the village where modifications to the network can be applied to slow traffic and improve the safety conditions, particularly in relation to the pedestrian experiences as a result of any traffic increases.

Local concerns have been raised regarding highway safety at the A412 /Black Park Road junction. Whilst these concerns are reflected by an existing accident cluster, they do not relate to impact caused by this development and are therefore an existing highway matter. As such it would not be appropriate to seek mitigation in this location from the applicant through this application as this route does not see a significant increase of vehicle numbers due to the development proposals. The development actively seeks to direct traffic to other more direct routes on the strategic road network.

It is the understanding of the Council that it is the applicant's intention to secure outline permission for the education hub and business hub, and then seek an alternative operator to move these elements of the site forward, in a similar way to the visitor attraction. It is the view of the Highway Authority that each element of the development be limited to a maximum floor space, and the visitor attraction to have a cap on the maximum number of daily visitors as this limits the associated trip generation to ensure that the impact of the development is as set out by the application. I am satisfied that this can be secured by condition.

The mitigation required to ensure that this overall development is acceptable in highway terms requires the delivery of two significant infrastructure schemes; the delivery of Five Points Roundabout and the Sevenhills Road Scheme. It is essential that the delivery of these schemes is secured in such a way as to ensure that disruption and inconvenience to road users is kept to a minimum, and the Highway Authority has certainty that the mitigation shall be delivered in a timely and appropriate manner. As has been set out in our previous response, the impact on the network is significant and complex, and made more so when considering the delivery of mitigation due to the effects of rerouting traffic. It is therefore the Highway Authority's position that the highway mitigation shall be required to be subject to a Highway Works Delivery Plan (HWDP) covering not only the Five Points Roundabout and Sevenhills Road schemes but also the delivery of the complete signing schedule.

It is also the Highway Authorities position that with respect to this application Sevenhills Road is required to be delivered prior to Five Points Roundabout, to ensure that the construction impacts of the roundabout scheme are mitigated as much as possible and to increase the network reliance. It is an incidental benefit that this will provide an alternative access to the studios during the construction period for the roundabout.

The Transport Assessment does not provide a phasing schedule of mitigation for a sequential build out.

It is therefore the Highway Authorities position that this application requires all mitigation to be delivered prior to the occupation of any of the elements of the proposals. This is due to the demonstrated capacity restraints on the network, and the severe impacts that are shown in the absence of the mitigation.

The Highway Authority recognizes that there is resolution to grant a permission for the Sevenhills Road scheme, and that permission provides the applicants with the choice to deliver Five Points or Sevenhills road as mitigation for the permission 13/00173/FA. The Highway Authority recognises that this application must carry the flexibility to allow an alternative scheduling if works have commenced under another permission. However, if no such works have commenced as both mitigation schemes are required by this permission the sequencing set out above should be secured.

The Highway Authority considers the Air Quality Management Area (AQMA) condition of the A412 Church Road to support the above requirement, so as to minimize any further detriment to the air quality within the area as a result of construction. This shall be secured by condition.

The aforementioned HWDP will be required prior to commencement in conjunction with a comprehensive Construction Traffic Management Plan (CTMP) this will take the form of a framework plan with elements in detail for access and routing arrangements. Detailed CTMP's will also be required for submission to the Highway Authority as part of all reserved matters applications. I am satisfied that this can be secured by condition. However, given the scale of the scheme, to ensure that the combined impact is managed all CTMP's and the HWDP must be coordinated. The Highway Authority seeks early engagement with the applicants regarding these matters considering the nature and extent of the highway works.

The Highway Authority has been asked to review the walking and cycling provision in the area and its relationship with the proposals. In undertaking this review it finds that the concerns that have been raised by the parish council can be seen to be impacted by both the construction and the operation of this proposal. The environment on the A412 Church Road is not conducive to active travel along this corridor, and as such the Highway Authority proposes that funds be secured in order to support mode shift and encourage increased walking / cycling in this area. It is also noted that there is a pre-existing scheme funded by the applicants to be implemented between the A4007 and Iver High Street and a scheme to sign walking and cycling routes to the site via Pinewood Green.

It is therefore proposed that funds be secured to provide a walking and cycling link between these two schemes along the A412 Church Road. This scheme should include a new footway / cycleway between Thornbridge Road and the zebra crossing at the south west end of the Parkway, set within the grass verge away from the main carriageway. An upgraded crossing providing a tiger crossing, and then widening of the existing footway to a 3m or maximum possible width route to the parish church. The footpath running beside the church should be cleared and widened to link to the A4007 at swallow street. Furthermore the footway between the church and Five Points Roundabout should be widened to its maximum level within the highway boundary. the final element of this scheme should be a review of the lining, and any recommended amendments made. It is the Highway Authority's position that funds be secured to improve sustainable travel in the area to be put towards the above scheme(s) to provide a connected and complete area of sustainable network maximizing opportunities for sustainable travel as set out in paragraph 102 and 110 in the National Planning Policy Framework (NPPF).

Mindful of the above, the Highway Authority is satisfied that this development is acceptable in highway terms subject to conditions and S106 obligations.

(23.12.20)

Site History

Prior to continuing with an assessment of the application before us, it is important to recognise the recent history regarding development at Pinewood Studios. The two applications that are of significance are 13/00175/OUT, a permission that was granted in 2014 for the Pinewood Studios Development Framework (PSDF). The second significant application is PL/19/4430/FA, the proposed alternative Sevenhills Road PSDF mitigation strategy, for which a resolution to grant has been passed in 2020, subject to an agreed S106 agreement.

The 2014 PSDF permission identified a requirement for mitigation to be provided at Five Points Roundabout (FPR), at the southern end of Pinewood Road. The agreed and approved mitigation at that time was the provision of a signalisation scheme of the roundabout providing signals on four out of five arms of the junction; the provision of additional lanes on the inside of the roundabout, and a displaced pair of Toucan Crossings on the A4007 Slough Road. For clarity an extract of this scheme is shown overleaf in figure 1, an extract taken from the 2019 application (PL/19/4430/FA).

This scheme has not been delivered and, in time an alternative mitigation proposal has come forward with support from Pinewood Studios, local residents and local members. This scheme provides improvements to Sevenhills Road along with upgrades to the junctions of this road with both Pinewood Road and the A412 Denham Road, application PL/19/4430/FA. An extract of this scheme is shown in Figure 2. This scheme was identified to be able to provide improvements not just to Sevenhills Road, but also other improvements to the local highway network. In summary, the scheme affords a degree

of rerouting of traffic, accounting for approximately one third of the Pinewood Studios traffic, removing traffic from the A412 Church Road, Thornbridge Road, and Pinewood Green. This rerouting also relieves

pressure on FPR. As such the application was found to provide acceptable mitigation to replace the original obligation set out in the PSDF application.

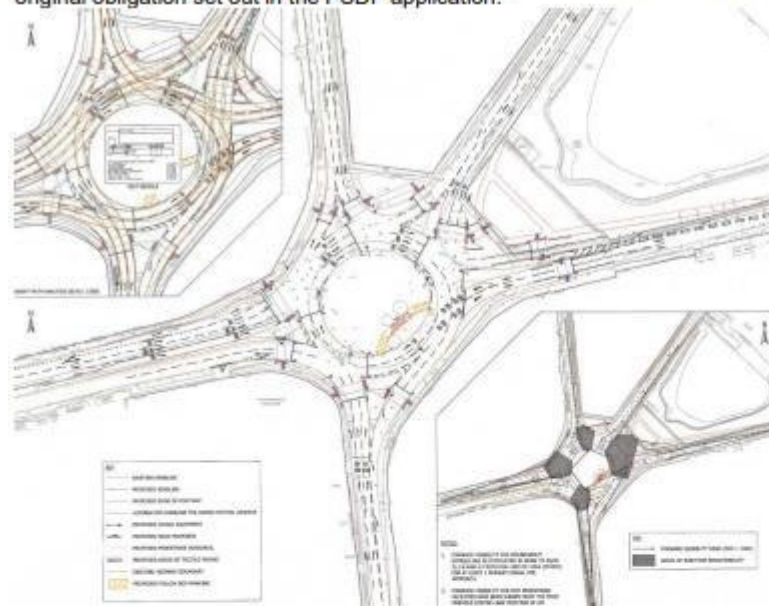


Figure 1. – The 2014 permitted FPR signalisation scheme.



Figure 2. – The 2019 Sevenhills Road improvement scheme.

Subject to the signing of the S106 agreement, Pinewood Studios have three months to notify the Highway Authority which scheme they intend to implement. However, it should be noted that the previous permission for the FPR scheme has expired and if this is the chosen scheme planning permission will need to be sought again.

Current Application Context

The current application seeks to bring forward a site to the south of the Pinewood West site, sitting between Pinewood Road and Black Park and the A412 Uxbridge Road to the south. Pinewood Road is an unclassified road stretching between FPR at its southern end and Sevenhills Road at the northern end. This road provides access to the existing Pinewood Studios sites (west and east) via a pair of roundabouts, between which is a Toucan crossing providing pedestrian and cycle links between the existing sites. A footway cycle route has been constructed along the west side of the road between Pinewood Studios and FPR as part of the PSDF scheme, and as part of the Sevenhills Road permission

a requirement has been made for an informal crossing point and a signed 'quiet route' providing walking and cycling routes through Pinewood Green.

Pinewood Road currently has a posted speed limit of 40mph on its approach to FPR, 50mph from a point approximately 150m north of FPR to a point approximately 200m south of Pinewood Green where the limit returns to 40mph. Immediately north of the Pinewood West access roundabout the speed limit drops to 30mph before becoming national speed limit north of the Pinewood East access roundabout. Between Pinewood Studios and FPR the horizontal alignment of Pinewood Road is straight with vertical undulations and a number of accesses to private residential properties that are set back from the road behind substantial hedges and trees.

The A412 Uxbridge Road by contrast is a dual carriageway between the Slough Borough Council Boundary and FPR, with a speed limit of 60mph, dropping to 40mph at approximately 250m from FPR. Five properties take access from the A412 to the north side of the A412 between the site frontage and FPR, whilst on the south side of the roundabout there are a number of residential properties, a petrol station and a small commercial yard that take access from the road. The Crooked Billet public house takes access from Wood Lane, but also has the provision of an access point onto the A412 Uxbridge Road.

Primary routes connecting the site to the Strategic Road Network (SRN) are in close proximity. The site location is shown in Figure 3 below, taken from Image 1.1 of the Transport Assessment.

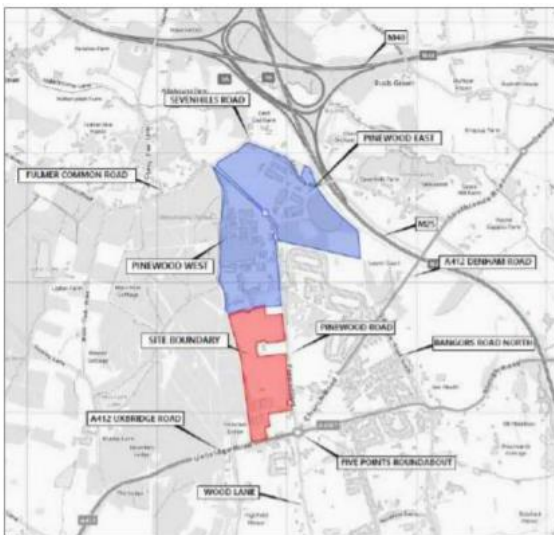


Figure 3 – Plan showing the site location (area in red)

The site does not however sit within just a road network serving motorised traffic, it also is within networks of footpaths, cycle routes and rail routes as set out in section three of the TA. As has been mentioned previously, Pinewood Road has a footway cycleway that runs along its western edge, in addition there are footways along the A412 Uxbridge Road, A412 Church Road and the A4007 Slough Road. There are also footways provided through the residential streets of Pinewood Green. These provide a network

of routes affording pedestrian connection to the site from Iver Heath and by extension onward to Iver Village. The strategic access officer has provided comments regarding the local footpath network and bridleways in the area.

The site also sits between the Great Western Mainline to the south and the Chiltern Line to the north, with stations at Iver/Richings Park, Langley and Slough. To the north there are stations at Denham, Gerrards Cross and Beaconsfield. The route of the Great Western Line also forms the route of the Elizabeth Line (Crossrail) as it leaves London to the west.

There is bus provision in the area, however Iver Heath and Iver Village are rural locations, and therefore the commercial bus services in the area reflect that. The frequency of the services is comparatively low, however as a result of the Travel Plan in place as part of the PSDF permission these services are augmented for Pinewood staff, and to a degree some local residents by shuttle services provided by the studios.

The proposed development is significant in scale and varied in usage, and therefore presents a set of discrete impacts on the highway network that come together to form the overall impact of the development. The largest element of the scheme is the provision of a visitor attraction for up to 8500 persons on a peak day, in addition to an Education Hub, a Business Growth Hub and New Studio Production Space all being provided on the site. At this outline stage no detail has been provided as to how these uses are to be arranged within the site.

Access Proposals

The application seeks to provide access to the site via four points, these have been described in the Transport Assessment and within a subsequent Technical Note (TN) (Ref: JCB/DF/ITL/16184-022 TN). I shall refer to this TN with respect to the access proposals. The first point of access proposed is a Left In/Left Out arrangement from and onto the A412 Uxbridge Road, located between the most Easterly of the existing laybys and the first residential property. The remaining access points are proposed to be simple priority junctions spaced along Sevenhills Road.

TN paragraph 1.6 sets these out as serving the different uses as follows below;

- One located in the north of the site to provide direct access into the new studio production space, business hub and education hub uses (i.e the 'Production' uses).
- One located in the south of the site to provide direct access into the visitor attraction (for staff and visitors); and
- One located between the other two access for use as a service access (for use by either the Production uses or Visitor Attraction.)

Figure 4 overleaf shows the locations of the proposed access points.

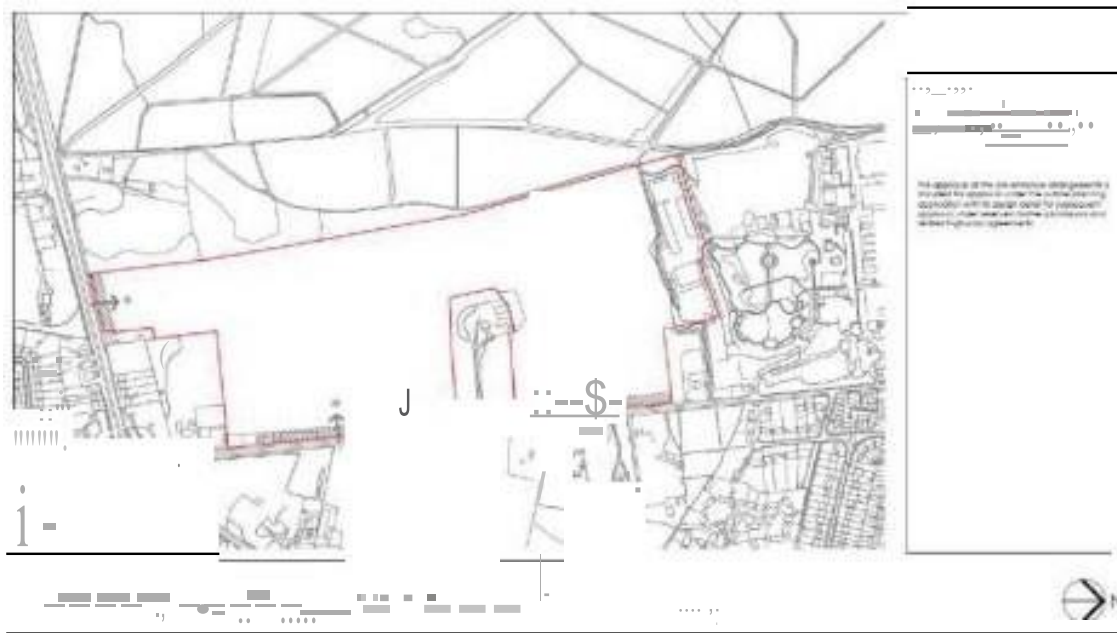


Figure4 - proposed access points.

The applicants have confirmed that the locations of the access points are fixed by the overall parameter plans shown within figure 4 above.

The minimum spacing between access points is 152m between the visitor attraction access point and the service access, whilst the production area access sits 303m from the service access. A plan of the general layout of the proposed accesses is shown below in Figure 5.

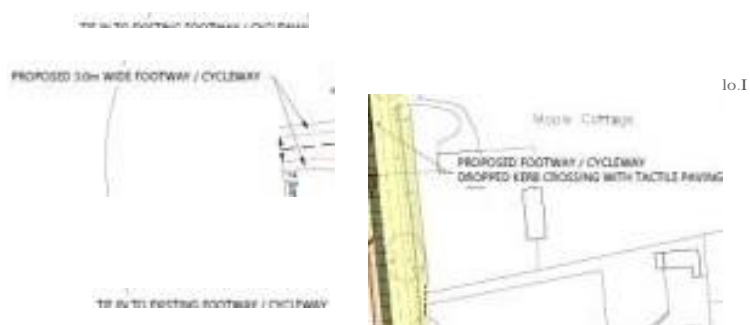


Figure5- Access arrangement as proposed for Pinewood Road.

Each access point on Pinewood Road is proposed to have the same layout as shown within figure 5 and has been subject to a stage 1 Road Safety Audit (RSA). Review of the RSA1 did not identify significant issues with the junction design, however this office has provided initial feedback regarding the drawings as provided within the TA, that the swept path analysis of the left turn movement out of the site shows that this is not possible for a Public Service Vehicle (Bus or Coach) without crossing the centre line. As a result, the Highway Authority has requested that the radius of the junctions be modified to ensure that this movement can be contained within the northbound carriageway of Pinewood Road. The applicants have agreed to this and a revision to the RSA1 has been carried out.

Each of the access points are proposed to have 3.0m wide footway/cyde-way leading into the site and carriageway widths of 7.3m. These are considered to be appropriate. It has also been confirmed that access features, such as access barriers, venue signing and the like are not to be placed on the access junctions and that these will be contained within the site. The applicants have stated through meetings that the only signing that will be present on the highway will be that agreed through the signing strategy. This shall be secured by condition to minimise clutter on the highway and ensure safety around the junctions.

All three of the access points on Pinewood Road are within the 50mph speed limit section of Pinewood Road. As has been set out previously the speed limit along Pinewood Road is subject to significant variation from 30mph at the lowest and 60mph at the highest. All existing junctions along the length of Pinewood Road are to be found in areas where the speed limit is not higher than 40mph.

The fourth point of access to the public highway sits to the west of FPR as a left in/left out arrangement as shown in Figure 6. This arrangement is by nature limited in the movements that it permits and is designed to be suitable for use on a high speed dual carriageway. The access initially proposed a taper and deceleration lane being provided on the approach to the access with an acceleration taper being provided on the exit. Pedestrian routes are proposed to be relocated along the edge of the carriageway with a pedestrian facility cutting across the splitter island within the access junction. The carriageway into the site has been designed to be 7.3m which the Highway Authority agree is appropriate for the free movement of the full range of vehicles that may be required to use the access.

The Stage 1 RSA identified some concerns relating to this access, notably the presence of an existing layby on the A412 which is close to the beginning of the taper and the interaction of the acceleration lane with traffic changing lanes and preparing for the approaches to FPR. Subsequently it has been proposed that the acceleration lane be removed from this access point to allow traffic to move directly into lane two of the carriageway and to investigate the relocation of the layby provision.

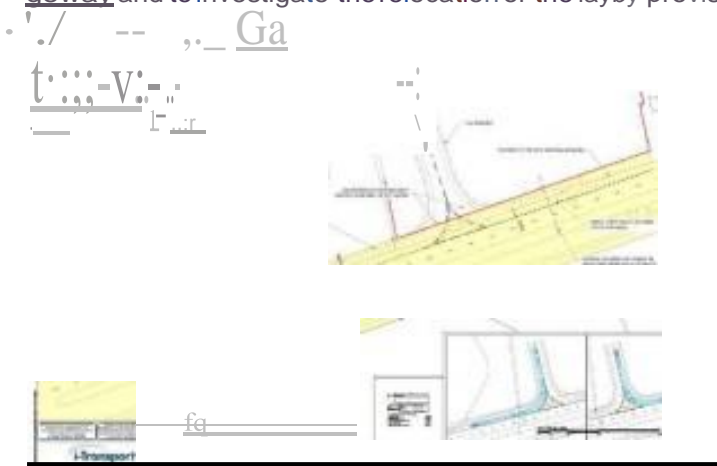


Figure 6-Access onto A412 Uxbridge Road, as initially proposed.

Speed survey data at the point of this access reports that the mean speed in both peak periods is 46.5mph while the 85th percentile speed is 54mph. These speeds concern the Highway Authority with respect to vehicles accelerating out of the access point potentially across a lane of traffic travelling at speed and then joining high speed traffic as it approaches FPR. In addition, there are existing residential properties that have direct access onto the A412 between this location and FPR. There is currently an uncontrolled crossing point between the residential properties and the fuel station/shop that provides the only link between these properties and local services. This is a hazardous crossing location and the introduction of additional vehicles exiting the proposed site onto the principle route at this location only serves to exacerbate this issue.

Buckinghamshire Council's Highways Development Management guidance states that access should •minimise impact on principal routes, in most cases this will mean developments should provide vehicular access to the lowest category road available . It is important to note that the traffic flows provided for 2036 show no vehicles using this exit. It is therefore not demonstrated that this point of access onto the network is required.

With respect to the concern raised in the RSA1 regarding the position of the existing layby, the Highway Authority is satisfied that a design should be submitted to re-provide the number of full spaces that are currently present by extensions to existing laybys. This shall be secured by condition. In addition to this, surveys should be undertaken in the spring and early summer of 2021 (subject to agreement with the HA) to determine if this provides adequate re-provision. The results of this survey shall be presented to the Highway Authority and Planning Authority for assessment. Subject to this assessment a scheme shall be submitted and agreed to be implemented prior to the opening of the access. This shall be secured by condition.

It is proposed that there shall be an additional point of access to the north of the site from the existing Pinewood Studios West Site, however this access would not have direct access onto the public highway, and would only provide for internal trips between different elements of the Pinewood estate. This is not of concern to the Highway Authority.

Highway Network Assessment

Assessment of the existing network conditions has relied upon guidance and agreement that took place for the Sevenhills Road application PU19/4430/FA. The Highway Authority had agreed with the applicants the study area and traffic survey data requirements for that application. Given the circumstances surrounding the COVID-19 pandemic, the Highway Authority accepts that the study area submitted is sufficient. Outside of the study area the majority of traffic is dispersed along several key routes; the M40, M25 and the M4. An assessment of other junctions that would potentially be impacted as a result of these proposals, is summarised below:

- Signal controlled junctions on the A412 at George Green on the Slough boundary have in recent years been subject to traffic signals refurbishment, and the Buckinghamshire Council ITS team have confirmed that there are no capacity concerns at these junctions;
- The M40 Junction 1 at Denham forms part of the Highways England network and any concerns relating to the operation of this junction would be expected to be addressed by Highways England; and
- Junctions along the A4007 Slough Road are shown in the distribution data to have low increases in vehicle numbers and so the impact would not be expected to be sufficient to require further work to these junctions.

There is reference made to the HGV make up in the traffic for the production uses, however HGV servicing is not clear with respect to the visitor attraction. It has been confirmed through dialogue with the applicants that servicing is to be managed in off peak periods and will be a mixture of some local servicing with the majority using primary routes when coming from further afield. As part of the Travel Plan framework a servicing plan can be secured by condition to ensure that HGV movements associated with the site do not have a detrimental impact on the operation of the network.

Study Area

The study area that has been covered by the TA covers the following junctions:

Pinewood Road/Pinewood East access (roundabout)
Pinewood Road/Pinewood West access (roundabout)
Pinewood Road/Sevenhills Road (priority junction)
A412 Denham Road/Sevenhills Road (priority junction)
Five Points Roundabout (FPR)

A412 Church Road/Thombridge Road(mini roundabout)
A412 Bangors Road/Bangors Road North/A412 Denham Road(mini Roundabout)

This network is shown in Figure 7, Ymich also shows the types of data recorded at each location. Data on speed, turning movements and flow were recorded at each location. The Highway Authority reviewed this survey data in detail as part of its assessment of the application PU19/4430/FA for the Sevenhills Road upgrade. That review found the data to be acceptable and it can be confirmed that this data remains acceptable as a baseline dataset

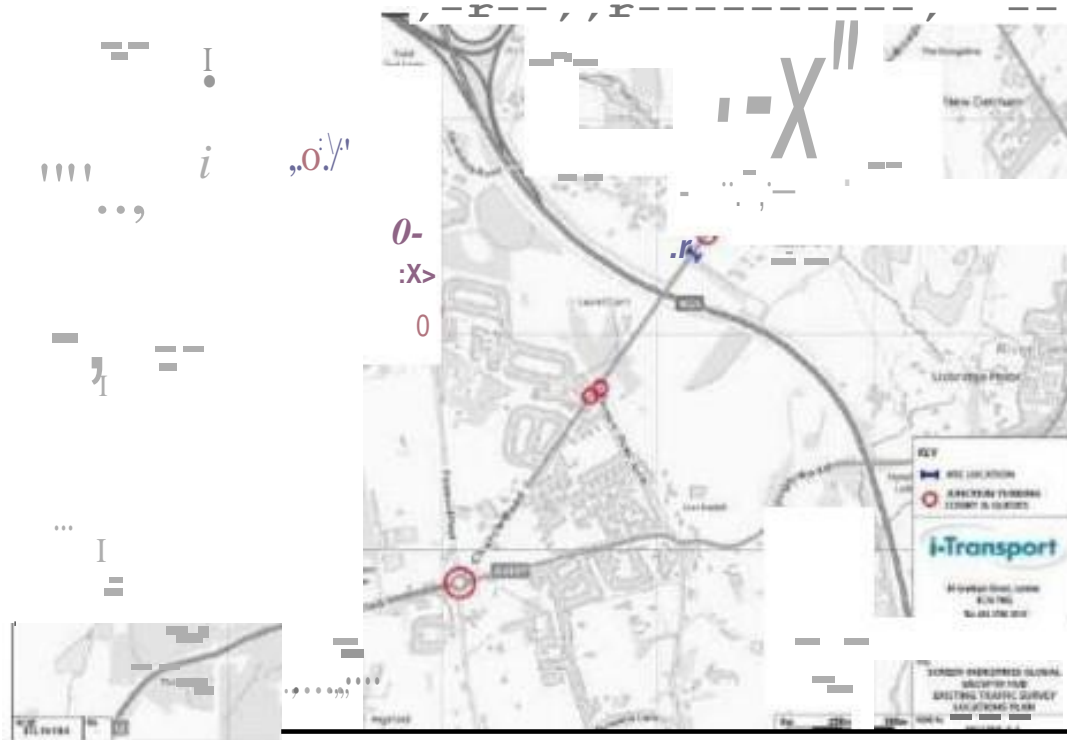


Figure 7 - Traffic survey area and survey locations.

Baseline

The Highway Authority agreed with the applicants that four peak hours should be assessed, two AM and two PM peak hours to assess these patterns. The peak hours assessed are;

0700-0800
0715-0815
1715-1815
1730-1830

Network assessment has been carried out using a series of local junction models in order to assess the impact at each individual junction within the study area. This is the same approach that was used within application PU19/4430/FA (Sevenhills Road). The base models used within the application are the same as those used and reviewed within the application PU19/4430/FA. The Highway Authority is satisfied that the models are representative and appropriately validated. The baseline assessment of the network is presented as 2019. This is considered an acceptable approach given the impacts of the COVID-19 pandemic. The results of the baseline summary are provided in Figure 8 overleaf. This is a copy of Table 4.17 of the TA.

Junction	2019 Operation
Pinewood Road/ Pinewood East Access	Below Capacity
Pinewood Road / Pinewood West Access	Below Capacity
Pinewood Road / Sevenhills Road	Below Capacity
A412 Denham Road/ Sevenhills Road	Over Capacity
Pinewood Road / Pinewood Green	Below Capacity
Five Points Roundabout	Over Capacity
A412 Church Road/ Thornbridge Road	Over Capacity
A412 Church Road/ Bangers Road North/ A412 Denham Road	Over Capacity

Figure 8 - extract from TA showing a summary of junctions in the baseline conditions.

The Pinewood Road /Pinewood East access junction currently operates within capacity on all approaches. The Ratio of Flow to Capacity (RFC) for all arms in the AM and PM peaks are below 0.5.

Pinewood Road /Pinewood west access currently operates with an RFC of 0.87 in the AM peak hours on the southern approach and 0.86 on the northern approach in the later PM peak hour. Whilst these are above the 0.85 threshold, they are not significantly high enough to represent a significant problem on the network, and the delays and queues demonstrate this being of low magnitude.

Pinewood Road/Seven hills road shows that the junction is operating well below practical capacity in all peak periods.

Sevenhills Road/A412 Denham Road is reporting that all arms have an RFC greater than 1 in both AM and in the PM peaks only the northern approach is operating within capacity. Once this condition has arisen the queue lengths grow rapidly, and the model becomes less reliable in the accuracy of the output. Very minor adjustments to model parameters can lead to significant changes in the outputs. The issue being demonstrated within this result is an excessively dominant flow along the A412 Denham Road leading to a lack of opportunities for any turning movements to take place within the peak periods.

Pinewood Road/Pinewood Green is reported as operating within capacity at all times and all arms with the exception of the latter AM peak Pinewood Green has an RFC of 0.85, which represents a very minor exceeding of the practical capacity.

Five Points Roundabout is reported as all arms being either just under or just over an RFC of 1. Pinewood Road and the A412 Church Road are the worst performing approaches in both the AM and PM periods. The greatest delays are found on Pinewood Road in the later AM peak (166 seconds per vehicle)

A412 Church Road/Thornbridge Road Mini Roundabout is reported as being above the RFC threshold of 0.85 on all approaches in all peak periods, with the worst performing arms as the southern approach in the AM, and the southern approach and Thornbridge Road in the PM periods.

Finally, the A412 Church Road/Bangers Road North/A412 Denham Road junction reports that in the AM peak all approaches are above 0.85 but below 1 RFC while in the PM periods Bangers Road North exceeds an RFC of 1.

This review of the network assessed shows that the predominant existing issues are found along the A412 Church Road corridor through Iwer Heath. Under normal conditions it is expected that over time there will be a background growth in the traffic found on the highway network. This has been presented within the TA for the years 2024 and 2036, as the anticipated year of opening and the end date of the local plan period. It must be acknowledged that since the submission of this application the draft Chiltern and South Bucks local plan has been withdrawn however, in the absence of an alternative local plan this assessment year remains robust. The growth factors for the future years have been reviewed and are agreed by the Highway Authority.

Trip Generation

As has been stated previously there are a number of proposed uses for the site, each with their own specific trip generation attributes. Therefore, each element has had a different trip generation applied using the most applicable method to that activity. Each of these individual assessment approaches is considered to be appropriate.

The background assessment of the network demonstrates that the times when it is most under pressure are Monday to Friday within the peak hours as set out previously. Therefore, these are the times during which the development traffic has been assessed.

The visitor attraction is expected to operate under three conditions;

Low days - typical weekdays during school term time with 5000 visitors over the course of the day. Medium

days - Week days during school holidays with 6500 visitors over the course of the day.

High Days - Weekends and bank holidays with 8500 visitors over the course of the day.

Staff levels are expected to be uniform through all of the day types with 613 employees on site each day, following a shift pattern that provides staffing cover from 0730 to 2230. Consequently, of the 613 staff on site only a limited number will be travelling to work in the peak hours. Given that the network is under the greatest strain on weekdays in school term time, the assessment for visitor numbers has been carried out using the visitor profile of a low day.

Figure 9 overleaf shows the staff trip generation for the visitor attraction as set out in table 8.4 of the TA, whilst splitting it across different modes in accordance with the 2011 census data for journeys to work. This is considered robust given that Pinewood Studios have a successful shuttle bus service running and subject to maintenance and development of this, a modal split of at least this level is readily achievable. The table shows that in the busiest peak hour (0715-0815) for staff trips there will be 126 additional trips added to the net NOI.

TIME PERIOD	Trips by Mode						
	Driver	Passenger	Trade Coach	School Coach	Public Transport	Total	
	20.0%	40.6%	18.0%	5.0%	20.0%	100.0%	
AM Peak Hour 2 (0715-0815)	Dep	0	0	0	0	0	
	Total	0	0	0	0	0	
	Arr	0	0	0	0	0	
	Dep	0	0	0	0	0	
	Total	0	0	0	0	0	
	Arr	0	0	0	0	0	
	Dep	129	258	97	32	129	645
	Total	129	258	97	32	129	645
PM Peak Hour 1 (1715-1815)	Arr	0	0	0	0	0	
	Dep	129	258	97	32	129	645
	Total	129	258	97	32	129	645
	Arr	0	0	0	0	0	
PM Peak Hour 2 (1730-1830)	Dep	129	258	97	32	129	645
	Total	129	258	97	32	129	645
	Arr	0	0	0	0	0	
	Dep	129	258	97	32	129	645

Figure 10- Total visitor person trips through the peak hours, taken from TA table 8.6

	Staff Car Trips			Visitor Car Trips			TOTAL Car Trips		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
AM Peak Hour 1 (0715-0815)	87	0	87	0	0	0	87	0	87
AM Peak Hour 2 (0715-0815)	100	0	100	0	0	0			
PM Peak Hour 1 (1715-1815)	0	19	19	0	129	129			
PM Peak Hour 2 (1730-1830)	0	0	0	0	129	129			

Figure 11 -Total visitor vehicle tripsthrough the peakhours. taken from TN JGB/OF/ITL16184-0238 TN

The operation of the Education Hub is to be similar to that being employed at Beaconsfield National Film and Television School (NFTS) however it is worth noting that the NFTS site sits within the urban area of Beaconsfield and within walking distance of the mainline station. This site is in a more rural setting with less possibility for individuals to walk from a broadrange of public transport options, and so there will be greater reliance on the Travel Plan to support this position and the mode share that is being proposed.

Car parking is proposed to be limited for students in support of the mode share, however this places a risk of additional parking pressure on local roads if the Travel Plan is not successful. In order to protect against impacts from any failures of the Travel Plan in achieving the aims set out it is recommended that

		Trips by Mode from Census Data					
TIME PERIOD		Car Driver	Car	Public	Walking/	Other	Total
		Motorcycle	Passenger	Transport	Cycling		
		79.2%	5.4%	8.1%	6.6%	0.8%	100.0%
AM PeakHour 1 (0700-0800)	Arr	87	6	9	7	1	110
	Dep	0	6	9	7	1	0
	Total	87	7	10	8	1	110
AM PeakHour 2 (0715-0815)	Arr	100	0	0	0	0	126
	Dep	0	7	10	8	1	0
	Total	100	0	0	0	0	126
PM PeakHour 1 (1715-1815)	Arr	0		2	2	0	0
	Dep	19		2	2	0	24
	Total	19	0	0	0	0	24
PM PeakHour 2 (1730-1830)	Arr	0	0	0	0	0	0
	Dep	0	0	0	0	0	0
	Total	0					0

Figure 9- Staff trips for the visitor attraction during low day peak hours.

Visitor trips have been applied to the network on the assumption that people will arrive in the hour preceding their booked tour and depart in the hour after, they will be on site for up to five hours, with tours lasting three hours. Tours will begin at 0930 each day with 15 minute intervals between each tour commencing. On this basis visitor trips will all take place after the AM peak on the local network.

Figure 10 overleaf shows table 8.6 from the TA outlining the visitor trips through the peak hours. It also shows the modal split that has been applied. It is assumed that car occupancy will be three persons per vehicle, and 60% of visitors will travel by private car. The remaining trips will be by public or passenger transport mode. Given the ability available to the applicants to control this through the ticketing strategy the Highway Authority is content that this is a robust trip generation to apply.

Due to the continuous nature of arrivals and departures through the course of the day there will be a significant number of departures taking place in the PM peaks, as summarised in figure 10. As the TA only sets out the private car trips, the applicants were required to provide an updated number of vehicles that will be on the network in the peak hours. The revised vehicle movements table is shown in figure 11 overleaf.

a S106 obligation is agreed to support the implementation of additional measures to accelerate mode shift if required.

Figure 12 presents the trip rates that the Education Hub is anticipated to generate. The Highway Authority accepts that these rates are robust with the above additional considerations. These results show that the greatest number of vehicular trips occur in the latter PM peak at 46 trips.

TIME PERIOD		Trips by Mode from CensusDOT					Total
		Car Driver/ Motorcycle	Public Transport	Walking/ Cycling	Other		
		60.0%	13.3%	13.3%	3.3%	100.0%	
AM Peak Hour 1 (0700-0800)	Arr	6	1	1	0	10	
	Dep	0	0	0	0	1	
	Total	6	1	1	0	11	
AM Peak Hour 2 (0715-0815)	Arr	20	3	4	1	34	
	Dep	1	0	0	0	2	
	Total	21	3	4	1	36	
PM Peak Hour 1 (1715-1815)	Arr	11	2	3	0	19	
	Dep	16	3	4	1	27	
	Total	28	4	6	1	46	
PM Peak Hour 2 (1730-1830)	Arr	13	2	3	0	22	
	Dep	14	2	3	1	24	
	Total	28	4	6	1	46	

Figure 12-Education hub trip rates by mode taken from TA table 8.10.

Trip rates for the Business Hub have been calculated using TRICS® and subjected to the same analysis as above. These have been checked by the Highway Authority and are considered to be representative. These rates are shown below in figure 13. The greatest number of trips are found to be in the PM peak. It is considered that this would be as a result of the AM peak being earlier than a conventional peak hour.

		Trips by Mode from Consus Datio						
TIME PERIOD		car Driver	car Passenger	Public Transport	Walking/Cycling	Other	Total	
		Motorcycle	Passenger	Transport	Cycling			
		79.2%	5.4%	8.0%	6.6%	0.8%	100.0%	
AM Peak Hour 1 (0700 - 0800)	Arr	13						
		2	0	0	0	0	2	
	Total	1	0	1	0	0	19	
AM Peak Hour 2 (0715-0815)	Nr	27	2	3	2	0	34	
	Dep	2	0	0	0	0	3	
	Total	29	2	3	2	0	36	
PM Peak Hour 1 (1715-1815)	Nr	4	0	0	0	0	5	
	Dep	55	4	6	5		69	
	Total	59	4	6	5		74	
PM Peak Hour 2 (1730-1830)	Nr	2	0	0	0	0	3	
	Dep	43	3	4	4	0	54	
	Total	45	3	4	4	0	56	

Figure 13-Business hubtrips by mode taken from TA table 8.12

The final element of the development is the new production space. The Highway Authority agreed bespoke trip generation rates as part of the application PU19/4431/FA for the studio production space that has been developed on the Pinewood East site. This has been based on the results of survey data and calculations of the floor area developed as the site has been built out. The result of this analysis presents trip rates as shown in figure 14, in this instance it is presented as total vehicles and HGV movements.

Time Period	Arrivals		Departures		Total	
	Total Vehicles	HGVs	Total Vehicles	HGVs	Total Vehicles	HGVs
Fully Built Out PSOF Pinewood WH Trip Generation						
AM Peak Hour 1 (0700-0800)	257	0	16	3	273	3
AM Peak Hour 2 (0715-0815)	207	0	2	3	226	3
PM Peak Hour 1 (1715-1815)	16	3	156	2	172	5
PM Peak Hour 2 (1730-1830)	12	0	199	0	211	0

Figure 14 -Studio production space trip rates taken from TA table 8.14

To produce the trip rate of the overall site all the above trip rates have to be brought together to give the combined traffic generation through the peak hours, these rates are shown in figures 15 and 16 below. These have been taken from the trip generation, distribution and assignment technical note.

	AM Peak Hour 1 (0700 – 0800)			AM Peak Hour 2 (0715 – 0815)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Visitor Attraction	87	0	87	100	0	100
Staff	87	0	87	100	0	100
Visitors	0	0	0	0	0	0
Education hub	6	0	6	20	1	21
Business growth hub	13	2	15	27	2	29
New Studio Production Space	257	16	273	207	19	226
Total	362	19	381	354	22	376

Figure 15 – overall trip generation in the AM peak

	PM Peak Hour 1 (1715 – 1815)			PM Peak Hour 2 (1730 – 1830)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Visitor Attraction	0	148	148	0	129	129
Staff	0	19	19	0	0	0
Visitors	0	129	129	0	129	129
Education hub	11	16	28	13	14	28
Business growth hub	4	55	59	2	43	45
New Studio Production Space	16	156	172	12	199	211
Total	31	375	407	28	385	413

Figure 16 – overall trip generation in the PM peak.

These results show that the site as a whole will be expected to generate 376 two-way trips in the AM peak and 413 two-way trips in the PM peak. Studio production space is the greatest generator of trips on the network in both peaks, showing that the proposed operational model for the visitor attraction is important to keep the majority of the traffic outside hours when the network is under the most pressure.

A sensitivity test has been requested to assess the earlier development peaks of the visitor attraction. Additional network distributions have been provided, showing that the lengthened peak does not exceed the traffic volumes that are experienced within the peak hours. Therefore, the junction assessments that have been carried out remain robust. It does however demonstrate that the background levels of traffic will increase through the inter peak periods and this will have an impact on the attractiveness of the A412 Church Road, particularly if the signing strategy and routing is not maintained and robust.

Before considering the acceptability of the distributions that have been applied to the trips as set out above, it is necessary to consider the proposed signing strategy that has been submitted. A signing strategy was proposed and included within the permission granted for the application PL/19/4430/FA

Sevenhills Road.

As part of this application a more substantial signing strategy has been proposed covering the local highway network from the M40 Junction1 to the studios and the approaches to Five Points Roundabout.

This strategy directs development traffic away from the A412 Church Road in Iver Heath and seeks to keep traffic to Pinewood Road and Sevenhills Road. The Highway Authority supports the use of the signing strategy for the direction of traffic, however, as was stated in the previous application, are of the view that this strategy can be developed further to cover all modes of transport including walking and cycling. Therefore, it is advised that a revised and expanded signing strategy should be secured by condition. This strategy should show walking and cycling routes to local services, bus stops and train stations. It shall direct persons over the whole of the transport network, and not be exclusive to the road network.

Traffic Impact

The supplied distributions have been reviewed for each of the uses on site and each of the peak periods.

Junctions that will see the greatest increases in the number of vehicles turning at them are the A412 Denham Road/Sevenhills Road, Sevenhills Road/Pinewood Road and Five Points Roundabout.

To ensure that there is no 'hidden peak' distributions have been requested for the hour 1530 – 1630. This data confirms that whilst there will be increases in traffic volumes outside the peak periods it would not exceed the peak and so the junction assessments remain robust.

This response shall consider each junction in turn, beginning with the Pinewood Road/Pinewood East Access Roundabout. This junction is shown to operate within the practical capacity of the junction with the exception of the AM peak hours with the full development built. At this stage the RFC value exceeds 0.85 for the Pinewood Road North approach, however the queues are slight with a maximum number of vehicles being 8 and a maximum delay of 22 seconds. This is not considered to be a severe impact at this junction.

The Pinewood Road/Pinewood West Access Roundabout shows that there is greater strain on the junction in the future years. In the AM peak periods for both 2024 and 2036 the Pinewood Road south approach exceeds practical capacity; the issues are most significant in a situation where only FPR mitigation is provided. With the development and the full mitigation, the impacts are maintained at a level consistent with no development and the delivery of the SHR scheme. In the PM peak period, the only significant impacts are found on the Pinewood Road North approach if FPR is delivered as part of the PSDF mitigation. With the development and the full mitigation scheme this is again brought back to a level whereby the impacts are less than the background growth impacts. Therefore, the impacts at this junction cannot be considered to be severe.

The Pinewood Road/Sevenhills Road junction has been modelled as both a priority junction and as the new proposed roundabout. The results show that in all the modelled scenarios that the junction performs

well within practical capacity.

The A412 Denham Road/Sevenhills Road junction has been assessed as both a priority junction and as the proposed signals junction. Without signals this junction is not functioning acceptably within any of the future scenarios, as has been established through the SHR application. The current proposals give rise to degrees of saturation (DoS) in the AM peaks on the A412 of 90 – 92%. This highlights the importance of the travel plan and sustainable measures, which, to be successful must be both rigorous and carefully monitored to ensure that they are met.

Therefore whilst the junction is not showing a severe impact based on the modal split that has been presented, it is acknowledged that further information is awaited regarding a worse case modal split (an extra 10% by private car).

The results for the junction of Pinewood Road and Pinewood Green show that the provision of the FPR scheme alone, with or without development lead to excessive queueing and delays on Pinewood Green.

However, these issues are mitigated through the provision of the SHR scheme in all the scenarios due to the re-routing of traffic away from Pinewood Green and onto SHR and Pinewood Road.

Five Points Roundabout is a key junction on the network. This junction is shown to exceed practical capacity in all peak periods in both 2024 and 2036 without mitigation being provided or development taking place. This is the case even with the introduction of the SHR scheme. In the AM peaks delays are experienced of at least 100 seconds per vehicle on each approach, in 2024 and similar in the PM peaks. The greatest delays are experienced on Wood Lane in the AM peak periods and A412 Church Road in the PM peaks. The results show that the introduction of the signals scheme brings all approaches within capacity, with well-balanced queues and delays on each arm of the order of 30 seconds. These delays are not considered to be severe.

The results then go on to show that with the development in the 2036 future year the Wood Lane and A412 Uxbridge Road approaches start to exceed a 90% Degree of Saturation, reaching a maximum of 92.5%. This is not considered a severe impact as a result of the development.

The final existing junctions modelled are the pair of mini roundabouts forming the A412 Church Road junctions with Thornbridge Road and Bangors Road north. These have been modelled as separate junctions correctly, however the comments on these results shall be combined, given the proximity between the junctions. These junctions are shown to be operating well in excess of their capacity in all non-development situations, and there is no worsening of the situation with the development, rather a slight improvement is seen on the A412 Church Road in the PM peaks. The benefits at this pair of junctions is attributed to an improvement in network availability with the SHR scheme being implemented and the maintenance of this through the development is dependent on the success of the signing schedule managing route choices and the success of the sustainable travel plan ensuring that vehicle numbers on the network do not exceed those identified to be generated by the development. Review of the site access junctions shows that all the junctions are able to operate within capacity in all scenarios, and there is no impact on network performance as a result of these junctions being introduced.

However, it is the Highway Authority's position that justification for all accesses has not been demonstrated. The applicants have been invited to provide further justification for their proposals of four access points and at the time of writing have not provided additional written justification.

The table overleaf (Figure 17) is an extract from the Transport Assessment that shows a summary of the impacts of the development on the Local Highway Network junctions. Following review of the assessment, subject to being able to maintain the modal split that has been proposed for the overall development, the Highway Authority considers that this table is a fair and accurate summary.

Junction	Without Development with FPR	Without Development with SHR	With Development with FPR and SHR Mitigation
Pinewood Road / Pinewood East Access	Below Capacity	Below Capacity	Below Capacity
Pinewood Road / Pinewood West Access	Below Capacity	Below Capacity	Below Capacity
Pinewood Road / Sevenhills Road	Below Capacity	Below Capacity (with new roundabout)	Below Capacity (with new roundabout)
A412 Denham Road / Sevenhills Road	Over Capacity	Below Capacity (with new signals)	Below Capacity (with new signals)
Pinewood Road / Pinewood Green	Over Capacity	Below Capacity	Below Capacity
Five Points Roundabout	Below Capacity (with new signals)	Over Capacity	Below Capacity (with new signals and SHR upgrade)
A412 Church Road / Thornbridge Road	Over Capacity	Capacity Improvements (reduced queuing and delay)	No Change compared with 'Without Development with SHR'
A412 Church Road / Bangors Road North / A412 Denham Road	Over Capacity	Capacity Improvements (reduced queuing and delay)	No Change compared with 'Without Development with SHR'

Figure 17; Summary of junction performances with and without development and proposals.

The sensitivity test that has been requested, has at the time of writing not been supplied. It is therefore not possible at this time to comment on the impacts that an adjusted modal split would have on the network. Whilst the Highway Authority remains of the position that the split presented is achievable through a high-quality travel plan and the ticketing strategy, in the absence of these results it is not possible to make final comments on this matter.

Mitigation Discussion

The 2013 PSDF permission required the provision of a signals scheme to be implemented by Pinewood Studios at FPR. The 2019 application for SHR sought to bring about permission to replace this requirement with a scheme for improvements to SHR and new junctions to be constructed at either end of the road, encompassing matters of signing and sustainable travel matters. It is therefore accepted that the principle of both these schemes has been accepted by the Highway Authority. This application proposes that both schemes are required in order to mitigate the traffic impacts of the proposals (Figures 1 and 2 present the mitigation schemes). It is presented that whichever scheme is not delivered under the PSDF permission will be delivered as part of this permission. However, irrespective of the PSDF mitigation being delivered, both schemes are required and are therefore expected to be delivered by this application, subject to not having previously been commenced or delivered under an alternative permission. This shall be secured by condition.

It has been requested of the applicants that the design of the FPR scheme be reviewed in order to seek to improve the pedestrian provision when crossing arms of the roundabout. If it is possible to reduce the number of crossing points on any or all the arms then this should be done. At the time of writing this response details regarding the impact of such amendments to the junction in terms of the capacity have not been supplied. It is therefore the Highway Authorities position that whilst the general principle of the

junction layout is acceptable as mitigation, further investigation should be undertaken to demonstrate whether the design may improve the user experience for pedestrians.

It is noted that turning movements at the junction of Pinewood Road and SHR will be significantly increased as a result of the proposals. As part of the PSDF application and the subsequent SHR application the provision of permissive paths was secured to enable access to Black Park. The designs as submitted and approved were under conditions of normal activity through the working week and a conventional peak period of higher traffic flow with low traffic volumes in the inter peak period. However, these proposals change that environment significantly with higher inter peak traffic flows and a significant change to the weekend traffic patterns. The permissive path network is most likely to be used outside peak hours. Therefore, in order to make the scheme acceptable further pedestrian improvements shall be required at this junction to aid access to Black Park. These shall be secured by condition.

The TA addresses the impact of the development on Fulmer Common Road. The Highway Authority is aware of on-going discussions with Fulmer Parish Council and understands that the applicants have produced a document outlining a number of traffic calming options that are to be presented as a result.

The Highway Authority is satisfied that an appropriate traffic calming scheme can be secured by condition.

In response to public concerns regarding parking in Pinewood Green, the applicants have undertaken parking surveys to identify the nature of the parking that is taking place. At present the Highway Authority are not in receipt of the results or analysis of these surveys and further information is required to determine whether further mitigation is required.

In an email to the Planning Authority on the 15th December 2020, it was proposed that 200 parking spaces would be made available for use by visitors to Black Park. This is a proposal that has not been included within the Transport Assessment and therefore has not been assessed. The Highway Authority seeks clarification as to whether this does form part of the applicant's proposals. If the proposals do include a further 200 parking spaces at Black Park, further assessment would be required so that a robust assessment of the associated impact can take place.

It is relevant to note that the Highway Authority has received communications from the Country Parks team highlighting concerns regarding traffic movements in the area of Black Park. These representations were made on the 20th December 2020. Further consideration of this matter is required.

Sustainability.

It is of great importance to the Highway Authority that the Framework Travel Plan provides confidence that it contains sufficient detail to ensure that the aspirations and ambitions that it outlines are going to be realised in the future years. The discussions with the applicant to date have been constructive and remain on-going as the Highway Authority awaits the aforementioned sensitivity test.

The Highway Authority recognises that the applicants and their agents are in agreement with the Authority regarding the need for the Framework Travel Plan to be robust and to work well both in its own right and in conjunction with the PSDF existing travel plan. There is also agreement that a Travel Plan Steering Group will need to be in place to ensure that the desired modal split is achieved and that the reviewing of the plan is maintained.

The Highway Authority notes that additional information has been provided on the 23rd December 2020 with regard to initial feedback and further comment shall be made.

Conclusions

This application represents a major development with multiple proposed uses on the site each with different trip generations and transport impacts. Whilst large proportions of the application have been reviewed and are in a position whereby the Highway Authority is satisfied, it is acknowledged that this is dependent on certainty that the modal split will be achieved and the sustainability aspects of the application can be finalised and agreed in order to ensure that the application is acceptable in highway terms. In order to reach that position a number of items are outstanding;

- The results of parking surveys on Pinewood Green
- The results of the sensitivity tests for the traffic modelling
- The results of the potential adjustments to improve pedestrian facilities at FPR
- Conclusion of discussions regarding sustainable travel and the Framework Travel Plan
- Conclusion of discussion regarding S106 obligations
- Investigation and conclusion of discussions regarding access and parking relating to Black Park

Once the above matters have been concluded the Highway Authority will be in a position to make a recommendation and propose any conditions/S106 obligations that are considered to be required to make the application acceptable in highway terms. Until such time the Highway Authority reserves its final position on this application.

The Gardens Trust

(12.11.21 most recent comments pasted below, original comments received 19.11.20)

Thank you for re-consulting the Gardens Trust (GT) and Buckinghamshire Gardens Trust (BGT) about the above application. We can see that the amendments include numerous documents relating to such diverse matters as the environment, bats, habitat etc, and some are over 50+ pages long, amongst a list of 620+ documents. Whilst we appreciate the effort that has gone into looking at these aspects in such detail, my time is very limited and colleagues in the Bucks Gardens Trust are volunteers and therefore do not have the capacity to go through all of these on the off chance that there is some reference to the designed landscape of relevance to the GT/BGT.

In our previous response, we specifically requested that the applicants commission a Heritage Impact Statement as we had concerns about the impact of the proposals upon locally significant Heatherden Hall and Black Park and Grade II Registered Langley Park. In the absence of such a document, our position remains the same as in our previous letter. If a Heritage Impact Statement does exist, we would be very grateful if we could be directed towards it. To aid your officers when considering the application, and the applicant when assessing the impact of the proposals, we are attaching our recently completed Buckinghamshire Gardens Trust reports on Black Park and Heatherden Hall.

Originating as a medieval deer park, Black Park was landscaped in the 1740s as a detached hunting park for the 3rd Duke of Marlborough. It originated as a hunting park for the historic Langley Estate

with its boundaries defined by 1607 separating it from the adjacent Langley Park which surrounds the mansion. Black Park then developed from heathland as a detached hunting park and was landscaped during the mid-C18 by the 3rd Duke who also owned the adjacent Langley Park. Langley Park was developed for the 4th Duke by Lancelot 'Capability' Brown in the 1760s alongside his work at Blenheim Palace and he may have influenced elements of the layout of Black Park. In any case the two parks were linked by an early C17, or earlier, avenue retained by Brown, giving access directly from Langley Park to the hunting ground of Black Park but this has been disrupted by the C20 dual carriageway (A412) which also cut back the south boundary with the loss of the C18 or early C19 ice house. The extensive Black Park, which never had a focal building, remains intact.

Heatherden Hall, now part of Pinewood's existing complex, comprises complex formal and informal gardens for a mid-late C19 villa which was substantially enlarged in the early C20 when the gardens were re-designed with the addition of a lake, fountain and grotto by the notable landscape firm James Research - Conserve - Campaign Pulham & Sons. The house and gardens were retained as the core of the renowned Pinewood Film Studios, which opened in 1936 as a country club and for film locations. The garden retains much of the historic character and detailed layout established by the 1930s including hedges, sculpture, mature ornamental trees and other planting.

The setting of Black Park and Langley Park remains surprisingly rural and this enormous development will have a large effect on both together with that of Heatherden Hall. We look forward to either being directed towards a Heritage Impact Statement or to the applicant providing one as it is not possible to assess these extensive proposals without considering the impact on these significant designed landscapes. This should consider the immediate visual effects on the adjacent Black Park and Heatherden Hall, and the more distant Registered Langley Park, together with the effect of noise and night time light emission.

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trusts BBOWT

(26.11.21 most recent response, original comments received 15.12.20)

Thank you for your consultation on the above planning application. The Berks, Bucks and Oxon Wildlife Trust (BBOWT) is a local nature conservation charity, and as such our comments relate specifically to the protection and enhancement of the natural environment and wildlife. We comment on as many relevant issues as our resources allow, and the absence of a comment on an issue should not be taken as our approval.

BBOWT provided comment and objected to the application in a letter dated 15th December 2020. A number of updates and amendments to ecology and proposed mitigation has been proposed since the original submission. We are happy to see that additional bat surveys were undertaken in the 2021 season, including trapping and radiotracking surveys of the rare Bechstein's bat to ascertain whether the species is using the site. However, BBOWT still have concerns regarding the scheme and objects to this application for the following reasons:

- Baseline data unavailable
- Mitigation within the lighting strategy is not appropriate
- Inappropriate relocation of the Peace Path
- Severance of important bat commuting corridor
- Insufficient dark zone area
- Negative impacts on Black Park
 - o Light pollution
 - o Increased recreational disturbance
- Errors and out of date BNG assessment
- Insufficient effort to mitigate for loss of nesting red listed BoCC species

Baseline data unavailable

A number of baseline data reports are provided as Appendices to the Environmental Statement (ES), however the breeding bird report referred to in the Appendix 8.1: Extended Phase 1 Habitat Survey report, Haines, B. (2021) Ornithological appraisal of breeding bird assemblages at SHUKRoyale site, Iver Heath, Bucks, UK. West London Birding has not been provided for review.

Similarly, the report states on page 19 that environmental DNA surveys for great crested newts (GCN) have been undertaken which returned negative results. No methodology has been provided, and as such it is not clear if these surveys were undertaken in line with best practice guidelines and therefore if the results can be relied upon. Appendix 8.2: Badger Survey Baseline, was also unavailable to BBOWT for review, however it is appreciated this is likely for confidentiality reasons and the summary provided in the Biodiversity ES chapter is sufficient in this instance. However, without the breeding bird and GCN baseline information I am unable to fully appraise the impacts of the proposals and whether the mitigation outlined is appropriate.

Mitigation within the lighting strategy is not appropriate

The mitigation within the framework lighting strategy is not appropriate to prevent impacts on bats and other nocturnal animals. Primary Mitigation for the Operational Stage of the works states that the site layout will “Utilise the position of trees and foliage surrounding the residence to remove, where possible, the visual impact of the site and reduce light trespass and glare onto the property.” There should be no light spill on to trees and boundary vegetation, which are foraging and commuting corridors for bats and may also be used as roosting sites for bats. Such vegetation should not be used as a mechanism to prevent light spill, indeed it should itself be protected from light spill.

Tertiary Mitigation for the Operational Stage of the works states that “lighting will be 3000K or less.” This is not in line with best practice to prevent impacts on bats. Guidance Note 08/18 on Bats and artificial lighting in the UK (Institute of Lighting Professionals, 2018) states that “A warm white spectrum (ideally <2700Kelvin) should be adopted”.

Inappropriate relocation of the Peace Path

Whilst BBOWT is happy to see that the Peace Path is proposed to be relocated within the new scheme due to the importance of the route for the rare Bechstein’s bat, the new route is not considered to be in an appropriate alternative as it is also of importance to commuting and foraging bats in the area. Appendix 8.3: Bat Survey Report, details the results of bat activity static monitoring surveys, reporting that “SMP3 in the south of the Site recorded the highest levels of activity... This distribution also correlated with the transect surveys.” The location of static monitor 3 (SMP3) was along the tree line which the relocated Peace Path is proposed to follow closely to. Paragraph 4.5 states that the route of the current Peace Path and the tree line of the proposed new location of the Peace Path “were considered to be of particular importance for bats in the context of the Site, as these linear features provided habitat connectivity between the west and east, which was otherwise limited.”

A number of different species were recorded using this tree line, several of which were trapped during targeted surveys in this location including Bechstein’s bat, common pipistrelle, soprano pipistrelle, Natterer’s bat, Daubenton’s bat and Leisler bat. Brown long eared bats were also recorded here and this species and Myotis species (such as Bechstein’s, Natterer’s and Daubenton’s bats also recorded here) are known to be particularly light sensitive. The relocated path would inevitably result in increased levels of lighting in this area. There are also a number of trees with bat roost suitability. The impact on bats in the proposed location of the new Peace Path has not been sufficiently considered.

Severance of important bat commuting corridor

I am concerned that there is a new access point proposed through the hedgerow along the northern boundary of the site, where the existing Peace Path is located. This has been shown to be an important route for commuting rare Bechstein's bats (as discussed in the Advanced Bat Survey Report by AEWC Ltd). Any new access point is likely to require the removal of vegetation, and result in an increase in lighting along a new road from street lights and from car headlights. This could sever the commuting route for bats and result in a significant negative impact on the local population.

Insufficient dark zone area

The incorporation of a dark zone to mitigate impacts on nocturnal animals such as bats is a positive step, however BBOWT does not feel that the areas identified in the PP4 Green Infrastructure and Ecological Mitigation plan goes far enough to mitigate impacts. As discussed above, the southern tree line (identified as the new location for the Peace Path) is of high importance to foraging, commuting and possibly roosting bats within the area. The dark zone should be extended to cover this tree line.

Negative impacts on Black Park

Black Park Country park is a large area of woodland and heathland which includes areas designated as SSSI for its nationally important heaths, acid grassland and wet woodland habitats within a wider area designated locally as a biological notification site. It has a number of rare associated species including heathland birds and invertebrates.

Light pollution

Our concerns outlined in our response dated 15th December 2020 relating to light pollution on Black Park still stand and I outline these again here. There is evidence that the existing Pinewood Studios site is the cause of light pollution in the local area including into the northern section of Black Park Country Park (Figure 1).

Whilst a Framework Lighting Strategy has been provided in Appendix 4.1 of the ES, and this in principal outlines some appropriate lighting measures (noting the issues outlined above), I have been unable to find a lighting plan submitted with the application. It is assumed that the lighting associated with more studios and a visitor attraction would be similar or worse than the existing site.

Light pollution affects the tranquillity of an area and also disrupts nocturnal wildlife such as bats. A lux plan should be provided as part of the application.

Increased recreational disturbance

Chapter 8 of the ES states that "It is unlikely that the Proposed Scheme will result in any notable increase in recreational visits to Black Park as a consequence of this replacement link, including both the SSSI and LNR, because the purpose of visitation would be primarily to utilise the proposed visitor attraction. Current residents utilising a relocated path would not be expected to contribute to increased recreational pressure on Black Park because this element of visitation already contributes to baseline conditions at site." The document titled 'A new Peace Path – above and beyond for better access. More accessible and attractive' accompanying this application directly contradicts this statement, detailing that the new Peace Path will be "more accessible to more people". The table on page 5 of this document shows that the new Peace Path will be accessible to 1255 new homes within the same distance. Furthermore, the ES states that "Importantly, the operation phase will not contribute to those types of recreational visit which are typically most damaging to ecological features, such as dog walking... and anti-social activities such as vandalism which are typically associated with residential developments and not with leisure based visitors." When considering a

potential increase of 1255 new dwellings being able to regularly access Black Park these statements are unfounded, as a proportion of these dwellings will be dog owners and will potentially use the path for dog walking, and improving access to 1255 residential dwellings could result in antisocial activities. The mitigation outlined is predominantly focused on mitigating impacts of recreational visits from visitors to the proposed scheme, and does not mitigate an increase in visitors from residential dwellings. I therefore question the assessment that the residual effect would therefore be negligible (not significant). Indeed, as it stands it is likely to lead to a negative and significant impact on Black Park from increased recreational disturbance.

Furthermore, the EIA has made assumptions about the level of increased visitation to the country park resulting from the scheme. However there doesn't appear to be any evidence submitted to support these assumptions. I would expect that an assessment of the likely number of visitors per year resulting from the scheme to be undertaken and submitted to inform decision making. Without an evidence-based estimate of the additional numbers of visitors anticipated as a result of this scheme, presented as a percentage of the present total visitor numbers to Black Park it is hard to ascertain whether the adverse effect on the habitats at Black Park will be significant at a local, county or national level. The LPA has a Duty to conserve biodiversity, prescribed by the NERC Act 2006.

Errors and out of date BNG assessment

I am pleased to see that the applicant has aimed to achieve biodiversity net gain and that a biodiversity metric has been used to provide evidence of this. However, there is a major error in Appendix D: Biodiversity Metric of the Biodiversity Net Gain (BNG) report. The screenshot of the metric shows an error in the 'Site Habitat Creation' section, with the area of habitat created not matching the area of habitat loss. There is a loss of 29.76 ha of habitats, with only 7.36 ha created. I believe this is because no hard-landscaping (e.g. roads and buildings) have been included in the created habitats. As such the net gain in habitats the metric appears to show is wildly inaccurate.

The metric should be updated to DEFRA 3.0. Whilst it is appreciated the original application was submitted in 2020 when only the DEFRA 2.0 metric was available, updates to the biodiversity sections of the application have been provided as most recently as October 2021. In addition, the metric provided does not use the most up to date maps for the proposed scheme. For example, the PP4 Green Infrastructure and Ecological Mitigation plan referenced and provided in Appendix A of the BNG report has been updated in the October 2021 document submission. Furthermore, it is also unclear as to why the five points roundabout area has not been included within mapping and BNG calculations.

I advise that the BNG calculations are corrected and updated (incorporating five points roundabout within this if appropriate, or justification provided for why it is not included), the DEFRA 3.0 metric is now used, and that the excel spreadsheet is submitted to aid review and enable decision making regarding net gains in biodiversity.

Insufficient effort to mitigate for loss of nesting red listed BoCC species, and opportunities for biodiversity enhancement

The Biodiversity ES chapter states that "The loss of grassland habitat will certainly result in the permanent irreversible loss of nesting red listed BoCC species including skylark (single pair) and lapwing (three pairs)... this effect cannot be mitigated on a like-for-like basis on site because the scheme design cannot incorporate the provision of the open spaces they require." I do not believe that the applicant has explored all options with mitigation for the loss of habitat for ground nesting bird species. The proposed scheme looks to provide a number of large buildings with a significant roof

area and in principal these could provide the open space required by these species to nest if green roofs were provided. Another nearby Pinewood studios development provided 2.4 ha of green roofs within the scheme, predominantly to provide habitat for skylark, but which also provided valuable habitat for other species such as invertebrates. This scheme has proved to be successful, with skylarks having bred on the roofs in their first summer. I would encourage that green roofs are provided within the scheme, both to provide mitigation for the loss of habitat for ground nesting birds, and to provide additional opportunities for biodiversity enhancement. Details of the successful scheme can be found here: <https://cieem.net/wp-content/uploads/2019/03/No.-3-Zoe-WebbPinewood-Studios.pdf> and <https://pinewoodgroup.com/pinewood-today/sustainability-environment> and <https://www.sky-garden.co.uk/news/sky-garden-wins-ecology-award-for-pinewood.php>

Buckinghamshire Strategic Access Officer

(11.11.21 Most recent response below, original comments 10.11.20)

Thank you for your letter of 29th October 2021 consulting on amendments to the above application. There are three items on which to comment relating to my earlier comments.

1. 'A New Peace Path' (Nov 2021); &
2. 'Illustrative Car Park Design & Peace Path Access Study', (22nd Dec 2020). Also included (22nd December 2020) are (3.) comments responding to my earlier 9th Nov 2020 letter.

1. 'A New Peace Path'

p. 4 provides a map with concentric circles, respectively centring on the junction of Pinewood Road with: 1. the existing Peace Path; and 2. the proposed New Peace Path. The subsequent table (p.5) then adds the number of residential properties within the circles, concluding the new Peace Path encompasses more properties and is therefore more accessible to more people.

The results in the table should be treated with some caution as they rely on accessing these centre-points 'as the crow flies' rather than the actual distance or the time taken walking along the footway/footpath network. This would result in asymmetrical isolines and different dwelling counts.

The results should also acknowledge the fact walkers can already access Black Park 558m west of Five Points roundabout along Uxbridge Road at Billet Lodge, whereas it's 914m to Black Park via the New Peace Path [with 354m to walk along Pinewood Road before you reach what will be a pleasant environment].

On the other hand, one also has to consider the Uxbridge Road A412 is busier and therefore relatively less pleasant than Pinewood Road. The 'Illustrative Car Park Design & Peace Path Access Study' includes a plan (p.13) with purple annotation (C) and description in the key: "Southern link to Black Park – Contributions to upgrade southern link along Uxbridge Road", which suggests the A412 footway could be improved, but this is not proposed in the application.

The table on p.5 also includes 360 dwellings from the allocated housing included from the withdrawn local plan [generally situated between Iver Heath and Pinewood Road], so the 360 dwellings probably need removing from the count. Nevertheless, if this land does come forward in the new Buckinghamshire Local Plan, then clearly the proposed route would provide a convenient connection to the New Peace Path, providing a convenient pedestrian and cycling link to Pinewood Road is possible from any housing development.

The study then goes on to illustrate the negative experiences along the existing Peace Path, to which I would add 'restricted opening times':

October to March 09.00 – 17.00 [not Christmas Day]

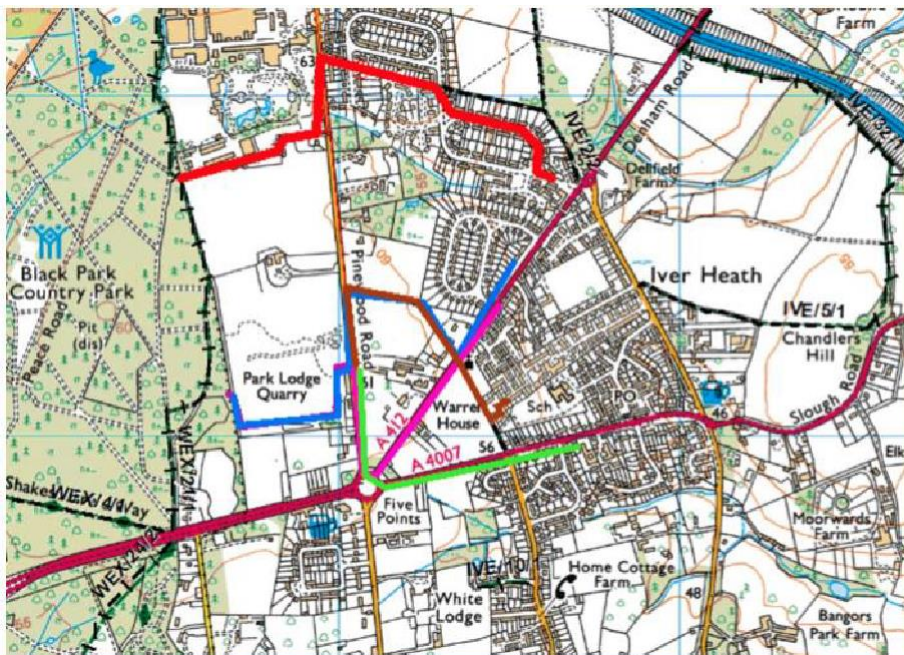
April to September 08.00 – 21.00

By comparison, all of the Pinewood East permissive footpaths/cycleways are ‘at all times following commencement of development’.

With the aforementioned caution over the results table on p.5 in mind, I’ve undertaken some desktop measurements showing various coloured lines, all measuring 1,500m for pedestrians to reach Black Park itself (Plan 1), where:

RED = 1500m via existing Peace Path;

BLUE, GREEN, BROWN and PINK = 1500m via New Peace Path.



Plan 1

This appears to illustrate more residents of Iver Heath are able to reach Black Park in the proposed situation, even though the New Peace Path is itself longer. Therefore, even though I can’t quantify alternative numbers of properties on p.5, I tend to agree with the general conclusion that more residential properties appear closer via the New Peace Path. However, this argument is weakened by the aforementioned A412 Uxbridge Road pedestrian access which already exists via Billet Lodge at the junction of Footpath WEX/4/1 and Bridleway WEX/21/1, albeit not for cyclists.

p.6 compares “Existing” and “New” paths in a table. Line 3 mentions “unsurfaced”, but the same page includes photos showing a surfaced path and I include similar conditions in Photo 1.



Extract 1

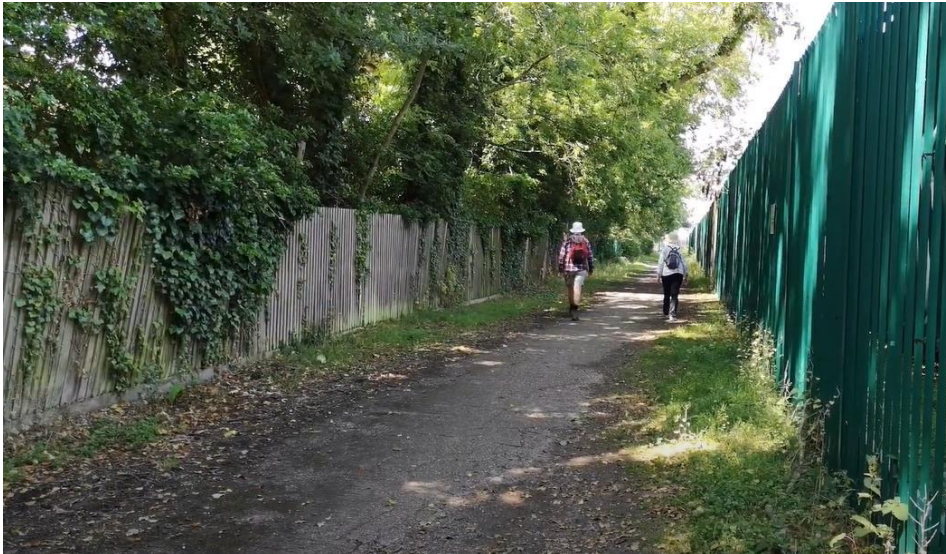


Photo 1

Many of the negative features identified in the could perhaps be resolved by widening the corridor [which may be needed for bat mitigation in any case], retreating the palisade fences away from the walked corridor and removing the opening restrictions. However, the suggestion is that an operational site of this nature is incompatible with retaining the existing Peace Path. I understand the specific arguments as to why it can't be retained or improved are made to you separately and not for me to comment upon.

The Peace Path is a generally wide corridor, direct (with one dog-leg) and with mature vegetation on the southern side. However, I also agree the New Paeace Path can be unfenced, wider and more attractive, subject to detailed design.

Other factors also come into play. Church Road, Slough Road and Pinewood Road are less pleasant pedestrian environments than Pinewood Green and Thornbridge Road [leading to the existing Peace Path], for example, so some residents might choose longer routes to reduce the distance exposed to traffic noise and fumes. It's noted the Church Road footway/cycleway improvements may be funded off the back of this application; and that, in the fullness of time, more traffic will be diverted along an improved Sevenhills Road, thus reducing traffic along Denham Road, Church Road and Pinewood Road [south].

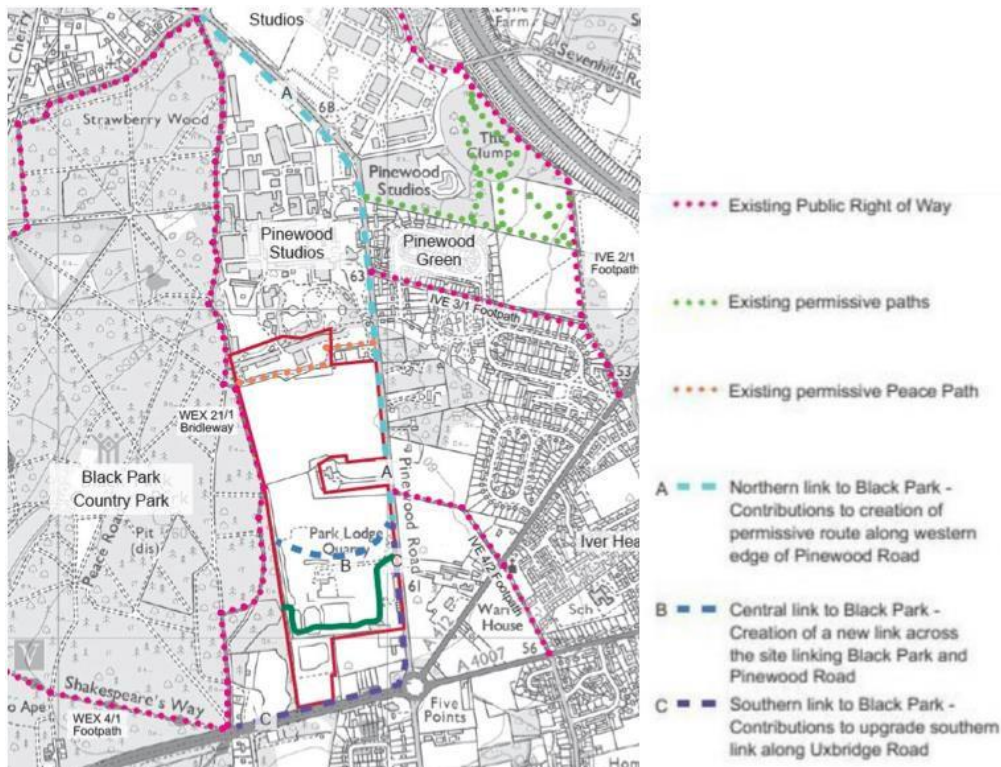
In addition, the southern half of Footpath IVE/4/2 linking Church Road and Pinewood Road is narrow, unlit, enclosed between fences and vegetation, and not overlooked, which reduces walkers confidence. I would therefore suggested a £40,000 s.106 contribution to be spent on improving the surface and width of IVE/4/1 to encourage walking access for employees and recreation and to compliment the aforementioned improvements agreed by highways colleagues. The applicant thinks there "may be merit" to Footpath IVE/4/1 improvements and mentions a contribution "reasonable in scale" (3.17) in their December 2020 response to my earlier comments. I believe £40, 000 is modest in resect of this application.

Other factors include the uncertainty as to where the New Peace Path enters Black Park, which could increase the length. It may need to cross the site's western boundary further north than currently illustrated to avoid (as yet unknown) wildlife sensitive areas and relies on an agreement with Black Park's management. The application clarifies: if access into Black Park can't be agreed, no path can be provided. I trust this can be addressed separately in consultation with Black Park's managers with precise alignments illustrated at detailed design. Nevertheless, the possible additional distance needs bearing in mind.

The existing route also has cultural significance following with the 1921 Anglo-Irish Treaty and the adjoining southern boundary road to Heatherden Hall was named 'Peace Road' in recognition. It has been in use for a significant period, though I'm unclear for how long.

2. Car Parking & Peace Path Study

This document outlines the proposed replacement Peace Path which I've copied in Extract 2.



Extract 2 – from *Illustrative Car Park Design and Peace Path Access Study* [p.13]

NB. the key description for Route A is a 'permissive path', but if sitting within the vehicular highway would be a public route.

I've also sketched a solid green line onto Extract 1, which is my translation of the replacement Peace Path, coloured medium blue or route B in the key, sketched from p14 of the same document.

In the context of the proposed development and wider north to south Pinewood complex, situated between Uxbridge Road and Fulmer Common Road/Sevenhills Road, the existing east to west pedestrian access is shifted from central to south with the introduction of the New Peace Path. In this scenario, residents in the southern and western parts of Iver Heath benefit, but those from the area around Pinewood Green do not.

You'll note Route A in the key [turquoise] identifies a "Northern link to Black Park – Contributions to creation of permissive route to along western edge of Pinewood Road". The December 2020 response [para 3.10] "identifies the potential" to mitigate the impact on Pinewood Green residents, but this is not proposed in the application.

3.10 To address this impact on Pinewood Green residents, the LUC document also identifies the potential to improve the footpath on Pinewood Green between the existing Pinewood Studio entrance and the northern entrance to Black Park (in the vicinity of the junction with Sevenhills Road). This improvement would provide a second alternative route into Black Park and would also create a circular route.

3.11 This route, together with the potential for further improvements to the south (along Pinewood Road and Uxbridge Road) are identified on page 13 of the LUC document.

The Northern Route which the study identifies has a number of advantages, which I list below, but this is not proposed in the application. It:

1. replaces the existing Peace Path connection to Black Park for residents in the vicinity of Pinewood Green inconvenienced by the shift south of the New Peace Path;
2. complements existing walking and cycling access [secured by Pinewood East s106 Schedule 6 and to be provided] emerging from just north of Pinewood Green [see my orange dashed lines below] from the direction of The Clump, emerging directly onto the existing Pinewood Road cycleway;



3. compliments the footpath/cycleway emerging at the western end of Sevenhills Road as part of the Pinewood East application;

4. complements the existing provision of a footway/cycleway along Pinewood Road and serves to encourage cycling to work from the north [for example Gerrards Cross];

4. improves access onto the realigned Sevenhills Road, widened to improve conditions for cyclists;

5. links to Bridleways WEX/21/1 and WEX/23/1 emerging at the north end of Black Park (red arrow on Plan 2), thus providing circular walking and family cycling options using Black Park and the New Peace Path; &

6. acts to mitigate the impact of additional vehicular movements generated by the development on walkers and cyclists using Pinewood Road north of the Pinewood East roundabout to the widened Sevenhills Road.



Plan 2 – red arrow indicates brideway connections to an extended Pinewood Road cycleway; with improved Sevenhills Road for cycling. The entry point onto the brideway from the new roundabout here will be provided by the Sevenhills Road permission.

Turning to the south, where walkers and cyclists reaching Five Points roundabout may wish to use the New Peace Path, these users travel north, then south, then west and north again (914m) to access Black Park. I think this could be improved by providing an additional link sketched red below, saving 370m of unnecessary north-south walking and cycling, 190m of which is along the Pinewood Road, close to noise and traffic movements which pedestrians would otherwise wish to avoid and exacerbated by the development's increase in vehicular trip generation ("376 two-way trips in the AM peak and 413 two-way trips in the PM peak"). I would suggest the additional link is secured as part of a condition.



Illustrative Peace Path replacement through Screen Hub site

Extract 3 – from 'Screen Hub UK | Illustrative Car Park Design and Peace Path Access Study'; p.14 (my red annotation)

There is no doubt the New Peace Path can be made attractive, as the 'Illustrative Car Park Design and Peace Path Access Study' and 'A New Peace Path' study illustrate, but I feel some temporal and spatial security of provision should be sought.

(01.11.21)

Please refer to previous comments for reference.

I have reviewed application amendments including masterplan drawing 3770-FBA-XX-00-DR-A-01_110 Rev

P3 and ES addendum review. No further comments to add.

(28.10.20)

Drawing 3770-FB-XX-00-DR-A-01-125 Rev P1 'PPA Green Infrastructure'

Drawing illustrates GI buffers/parameters around the perimeter of the site as part of the overall connectivity to adjacent GI/green corridors for the benefit of wildlife/habitat and visual landscape. The drawing outlines 'boundary provision will be between 10m and 30m in depth subject to detailed design and approval under reserved matters, with a substantive landscaped edge to Black Park (up to 30m in depth) and appropriate landscaping provision where building zones are close to adjacent residential properties (typically a 15m depth of woodland planting)'. As long as these buffers are not reduced there should be the flexibility to ensure that when final design is considered in collaboration with arboricultural consultant, ecologist, landscape architect, engineers etc that RPA's of retained trees are not significantly affected. The positioning of SUD's and any ground levels changes as part of the creation of bunds need to be kept out of the RPA's of adjacent trees. 30m width along the entire boundary Black Park should be considered a minimum and not a standard and the same for the proposed 15m for woodland planting as part of the reserved matters.

Landscape Strategy (document 11)

1.2 I hope the retention of existing landscape features around the perimeter of the site will be the main consideration or focus to help 'create significant and lasting green/blue infrastructure' as outlined in this strategy.

1.2.4 should include a management plan for delivering green/blue infrastructure proposed for the site with clear set out principles for next 40 years so that landscape created does not diminish over time due to changing operational pressures by incorporating elements of Biodiversity Net Gain Report pages 13-16 (Environmental Statement Vol 2). 1.11 is useful in providing an illustrative concept but as outlined above this needs to be carefully considered when considering landscape features/ground levels within proximity

to existing trees to avoid RPA's. In my opinion the proposed development would benefit with a minimum 15m zone for planting/screening along Pinewood Road instead of the suggested minimum 10m buffer, especially when you consider the maturity and visual importance of proposed tree cover along this boundary. Benefits of an increased buffer could help to reduce traffic noise as well as improved particulate pollution and landscape quality.

Environmental Statement Vol2 (document 13) Appendix 7.2. Arboricultural Impact Assessment (AIA)

Basically the summary (S1-S4) outlines that if any trees are removed it will be limited and will be identified as part of detailed design/reserved matters. Retained tree features will be protected and current proposals do not result in the need to prune any trees.

3.2.1 refers to the PPA GI plan (above comments). 3.2.3 2 mentions limited tree removal in the north of the site which will form part of reserved matters with 3.2.5 explaining that development will allow retention of principle arboricultural features as part of reserved matters application. 5.2.3 describes RPA incursion can be avoided through collaboration with arboricultural consultant as part of design/reserved matters but may not be possible in every case Remaining paragraphs of chapter 5 describe generic principles of best practice BS 5837 when working in vicinity of trees/RPA's. This level of detail would be expanded upon in a subsequent Arboricultural Method Statement with 5.2.10 outlining exact arboricultural implications are basically not known until detailed design/reserved matters. Chapter 6 is a generic summary similar to S1-S4 at the beginning of the report.

Interestingly the following paragraphs in Appendix 1 of this document:

- 1.3.7 mentions Tree Constraints Plan (TCP) following survey/assessment to ascertain arboricultural impacts resulting in a Tree Protection Plan (TPP).
- 1.4.2 mentions TPP identifies tree removal but did not see a TPP in any of the documents. TCP's illustrate removal of trees off site in appendix 4 of the tree report. Basically a typo as no TPP and appendix 4 is actually TCP's.

General Observations

Landscape scheme needs to consider the ultimate sizes (height/spread) of new trees being proposed throughout the site (car parks as well as GI buffers) to ensure they can attain a mature size as envisaged by the applicant/council (as part of ecological net gain) when considering the use of buildings or land for the purposes of the studios 24/7. This includes shade, leaf fall/natural debris which may in future may have an indirect impact on building or use of the land 24/7 so careful tree/shrub selection is needed to ensure the sustainability of the landscape strategy is 'strong and resilient' within the site.

The AIA contradicts itself slightly by saying in the main report that removals will form part of the future design/reserved matters but TCP's in appendix 4 illustrates tree removal. T50, T48, T1 appear to be highway trees off site. 1.4.4 mentions pruning specifications (none in report) but in the main body of the report S1-S4 mentions no need to prune trees. In my opinion the overall generalisation of this application is not particularly helpful in assessing the full arboricultural merits of this application but is helpful in describing the vision to 'create significant and lasting green/blue infrastructure'. The GI buffers outlined above will hopefully provide the flexibility to retain existing trees successfully. However, the wider these buffers could be the lesser the chance of RPA incursions or subsequent ground protection measures, tree removal by the creation of larger green/blue infrastructure.

Economic Development

(14.12.20)

The submission is accompanied by a number of documents which set out the socio-economic case for the proposal; Chapter 6 of the ES, Doc 07 Case for Growth and Recovery and Doc 14 Social and Economic Benefits Assessment and these have been reviewed as part of this response along with other application documentation.

The submission includes commentary on the alignment with relevant strategies at national, regional and local level and it is clear that this proposal will deliver towards a number of these strategic aims.

Buckinghamshire's Local Industrial Strategy (LIS) was developed in 2019 and sets out how the area will deliver the National Industrial Strategy's aim to raise productivity levels and to create high-quality, well-paid jobs. The LIS builds on the county's four key economic assets and unique capabilities and the momentum from current investment to help grow the economy and help Buckinghamshire to realise its potential as a truly world class and attractive location for business investment. One of the four world leading assets and sectoral strengths of Buckinghamshire, and a cornerstone of the LIS, is Pinewood Studios, the home of the British film industry and centre of excellence for film and TV production. Pinewood Studios, alongside the National Film and Television School, is at the heart of the creative industries sector cluster.

The LIS states that Buckinghamshire aims to be at the forefront of future changes in the way in which creative content is developed and consumed and to further consolidate this global industries capability, furthering export capacity and inward investment in the sector. The development of a new

Screen Industries Global Growth Hub at Pinewood Studios is specifically promoted in the LIS “to better link creative content providers with open access technical resources and with businesses and education networks, enhancing collaboration and providing opportunities for inspiration between businesses and education providers on skills development”. The submission of this outline application is an important step to realising the goals in this strategy. It represents a significant commitment to, and investment in, delivering a further world class facility of scale with a global reach building on the reputation and heritage of Pinewood.

This proposal will take advantage of the global asset and anchor institution of Pinewood realising significant benefits to the national, regional and local economy. The robust economic assessments provided in the submission suggest that through an investment of £450 million, 1,650 construction jobs and over 3,500 permanent jobs (directly and indirectly) will be created resulting in almost £350,000,000 total net additional gross value added in construction and £231,000,000 GVA annually in operation.

The LIS also seeks to boost the take up of industry placements in disciplines befitting the Buckinghamshire economy and to facilitate apprenticeships and employment-led models to address growing skills needs. This proposal aims to build on and improve the links to other anchor institutions and specialist education networks on and beyond the Pinewood complex complementing the existing offer. Bucks New University (BNU) already run courses in audio and music production, film and TV production and animation. In their letter of support, BNU have confirmed their wish to play an active role in realising the vision for the Hub, building on existing relationships with Pinewood and delivering higher education, skills and training as part of the Bucks Creates programme equipping students with the skills they need to succeed in this industry. This will open up the industry and sector to more people, making a career in film more accessible. The proposal is supported by the NFTS who are also keen to partner with Pinewood to make the proposed education facility a truly world class offering and addressing skills gaps in areas often neglected such as carpentry, lighting and costume.

The LIS refers to the need to support scale ups and support inter-network innovation and promotion of cross sector ambitions and to develop new and enhanced high quality incubation and co-working spaces. The proposal to include a business hub will enable the improvement of links to the wider business network beyond Pinewood and increase the opportunities for other businesses to take advantage of openings within the creative industries sector, supporting business start-up, growth and further employment creation. Many SMEs in the creative sector are linked to Pinewood and NFTS and its supply chains and which will benefit from this further expansion.

A Local Economic Recovery Plan is being produced for Buckinghamshire as part of a wider place-based recovery programme which builds on the foundations of the LIS but also which covers how to restart the economy in a Covid-19 safe manner. It states that economic recovery nationally, regionally and locally hinges on action to enable the continued growth of our economic assets and whilst film and high-end TV has been impacted in the short-term from the pandemic, it is predicted to be relatively resilient in the long term. Therefore, the building blocks from the LIS of the four economic assets and the drivers of productivity are cornerstones of the Economic Recovery Plan as Buckinghamshire seeks to take action to enable the core sectors continued growth and recovery. The delivery of this proposed facility is one of the priorities and key actions of the Recovery Plan, enabling the expansion of studio space where there is considerable demand and which Pinewood is well placed to find in order for it to meet its target of being at the forefront of screen-based production and which will aid local, regional and national recovery.

Pinewood also is a feature of the Buckinghamshire Recovery and Growth Deal, a scalable Buckinghamshire proposition due to be submitted to Government to accelerate UK recovery as part of a Deal which can add £10bn to the UK economy by 2050. The investment demonstrates confidence

in the region and has the potential to act as an attractor for further private and public sector investment.

The south of the county already hosts these two globally renowned state-of-the-art facilities (Pinewood and NFTS) and the proposal builds on the specific heritage and opportunities from these facilities. There are also highly concentrated creative and digital clusters with diverse specialisations in Aylesbury (and which is growing with recent permissions received for film making production facilities to the east of the town), High Wycombe, Milton Keynes, Peterborough, Cambridge, Luton, Northampton and Oxford with new facilities such as Upper Heyford Creative City. This proposal offers an opportunity to further consolidate the strength of this UK geography in the creative sector and further complement the existing facilities. Development in this location will also take maximum advantage of the connectivity to London and Heathrow.

In addition, the visitor attraction intends to build on Pinewood's history as the UK's oldest film studio and will significantly boost tourism as up to 2 million visitor numbers are expected to the visitor attraction generating new visitor spend of £77 million per annum. There is real potential that this will become a valuable and popular year-round attraction and provide a much needed boost to the visitor economy in the county and region, as visitors also take in other attractions as part of their visit as well as use restaurants, hotels etc. This will have an overall positive effect and at a time when this sector has been particularly negatively impacted. Opportunities to maximise these links will be explored fully in collaboration with partners such as Visit Bucks as well as Visit Britain and Tourism South East (and who have written in confirming their support to the scheme).

As referred to above, this is a project of national significance that aligns with National priorities and commitments such as the Creative Industries Sector Deal which has a target of doubling inward investment growth in the film and high-end TV sector to £4bn by 2025. The project has received support from members of the House of Commons and House of Lords, including written endorsement from the Secretary of State for Digital, Culture, Media and Sport supporting the exciting proposal which has the potential to form an important part of the government's work in championing the success story of British film to a global audience. Letters of support from the British Film Commission, Film London, Creative England, UK Screen Alliance and the Royal Television Society all highlight the significance of this investment and confirm the role it can play in boosting the creative industries sector, skills base and visitor economy. They also demonstrate the core existing networks already in place between Pinewood and these key institutions and which will only be further enhanced as a result of this proposed expansion. Buckinghamshire Growth Hub (BBF) and Buckinghamshire LEP have also offered their support to the proposal.

Summary and Recommendations

This sizeable proposal represents a substantial private investment from one of Buckinghamshire's anchor institutions. It will help to realise the potential of this economic asset to make a further significant contribution to the national drive to raise productivity, enable economic growth and further place Buckinghamshire as the focus and heart of the UK creative industries sector. It aligns with the aims and objectives of the Local Industrial Strategy for Buckinghamshire as well as the Economic Recovery Plan and proposed Growth and Recovery Deal proposition to Government.

The proposal is of national significance and will be of significant benefit to the national, regional and local economies and which is especially valuable at this time of economic uncertainty. The investment is a strong commitment and validation towards economic recovery in this key sector and will have both direct and indirect benefits, retaining and creating thousands of jobs, attracting visitors and spend to the area, and contributing to GVA. It will build on existing educational and business networks in the region, opening up opportunities to train, work and grow businesses in this sector.

This investment will cement Pinewood at the heart of the UK film industry and build on the wider reputation of the UK as a world-class visitor destination and of which Economic Development Officers are in full support.

Buckinghamshire Environmental Health (Noise) Officer

(20.1.2021)

I have read the report and broadly agree with the executive summary in that:

1. The consideration of the noise impacts generated by the proposed development was set out within Chapter 12 of the Environmental Statement (Document 13).
2. This was considered by the Environmental Health Officer and following discussion with applicant, there was general agreement that the noise impacts of the proposed development can be addressed by way of condition.
3. These conditions will require the submission of further information around the means of control and mitigation of activities that generate noise and vibration, with specific reference to construction (via a Construction Environment Management Plan) and operational activity (including the operation of the backlot).

If you have any questions please don't hesitate to contact me.

(9.11.2020)

General

The NTS describes the EIA process (2.2) yet the accompanying documents don't deliver. The preparation of the ES has been carried out in a very short period of time. As a consequence the scoping stage has been combined with impact assessment which is confusing for the reader. The noise baseline is not robust and can't be relied upon. It may be that data from previous studies could be used to inform the data. The assessment of likely significant effects presented between 4.35 and 4.38 is flawed.

12.12/12.13 The CEMP can't be relied on as mitigation because it has not been submitted.

12.14 Vibration should not be scoped out at this stage. Vibration from HGVs on the highway should be assessed.

12.19 Suggests that the ES has not adequately assessed operational road traffic noise.

12.23 Agree with this but the doors open operation should be considered

12.24 Night time operation at night should be assessed.

12.25 Not convinced that this activity falls within scope of BS4142:2014+A1:2019 but this may be the best fit.

12.27 Agree, Model clause could be The applicant will design construct operate and maintain the stationary systems so that the rating level of the fixed installations in normal operation at the worst affected residential receptor, minus the background level, is not more than dB determined in accordance with 4

12.3 See 12.14

12.32 The study area is too small 300m would be more appropriate. It would also be useful if references could be made to other themes such as Ecology and Landscape and Visual.

Table 12.3 doesn't include evening night, Sunday, BH or weekend lower thresholds.

Table 12.52 The collection of baseline noise and vibration data needs to be comprehensive. The effect of COVID-19 on the baseline also needs to be considered.

Ideally the baseline noise survey should be comprised of two elements:

1. Long-term unattended measurements undertaken continuously over a period of 7 days to include a full weekend, and;
2. Short-term attended short term sampling measurements undertaken over three sets of circuits (day, evening and night time) in a 24hr period.

During all measurements care should be taken to measure a free-field level and parameters required by BS7445, including:

- Type of instrumentation, measurement procedure, weightings and any calculation employed
- Description of time aspect of the measurements, i.e. the reference and measurement time intervals, including details of sampling periods.
- Atmospheric and metrological conditions; including (at ground level) direction and speed of wind, rain and temperature.
- Variability and emission of noise sources
- Description of ground between source and receiver
- Presence of any screening bodies
- Dominant noise sources in each location
- Nature of sound source and the character of the sound.

Sound level meters should be calibrated and checked before and after each measurement period, with no drift in levels recorded. Calibration certificates for each instrument should be referenced.

12.61 Would like to see this in the CEMP

12.62 See 12.27,12.19 Although BS4142:2019 may be the only standard available for assessing impacts from the backlot, it is not a good fit being too prescriptive for a management plan.

12.66 Ideally this should be combined with a commitment to BPM and Prior Works Consents (S61 CoPA 74 prior consent for noisy works) See 12.72.

12.98 Does this affect any other distant receptors?

12.105 Not convinced that modal shift can be relied upon as mitigation

If you have any questions please don't hesitate to contact me

Buckinghamshire Environmental Health (Contamination) Officer

(05.11.2021)

Thank you for consulting us on the above proposed development. I have no further comments to make with regards to land contamination. Please refer to my previous comments dated 10th March 2021 (Our ref. 21/00355/SECONT).

(10.3.2021) I have reviewed the relevant sections of the Environmental Statement prepared by Turley on behalf of Pinewood Group Limited.

Ground conditions and contamination is one of the technical disciplines that have been scoped out,

as it is not considered that contamination will result in significant effects. The ES states that the evidence for scoping out this topic is presented in Appendix 2.1.

I have reviewed the information provided in Appendix 2.1. I have also reviewed the Desk Study Review, Preliminary Risk Assessment and Ground Investigation Scoping Report prepared by Card Geotechnics Limited (Report ref. CG/38624/R001).

The Preliminary Risk Assessment has identified a number of potentially complete contaminant linkages. An intrusive investigation is therefore considered necessary. The environmental consultant has prepared a scope for the proposed investigation. I would recommend the following condition be applied to any permission granted:

The application requires the following condition(s)

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:
 - (i) A site investigation scheme, based on Desk Study Review, Preliminary Risk Assessment and Ground Investigation Scoping Report prepared by Card Geotechnics Limited (Report ref. CG/38624/R001) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, pests, woodland and service lines and pipes, adjoining land, ground waters and surface waters, ecological systems, archaeological sites and ancient monuments.
 - (ii) The site investigation results and the detailed risk assessment (i) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 - (iii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (ii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at

<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>.

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken, and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Buckinghamshire Minerals and Waste (11.11.20)

The land has been used for the extraction of minerals /disposal of (inert) waste by landfill but the provision has been made for restoration of the site through development management procedures. As set out in the glossary of the NPPF (page 70), it would not constitute previously developed land.

The quarry has not yet been fully restored and is not out of aftercare. There is an approved restoration scheme for the land and the proposed development would result in the loss of the approved restoration scheme and any benefits (such as the re-instatement of agricultural land, tree planting etc.) it would deliver.

Policy 25 of the adopted Buckinghamshire Minerals and Waste Local Plan 2016 – 2036 provides support for high quality restoration and aftercare of mineral extraction sites:

‘Policy 25: Delivering High Quality Restoration and Aftercare

Minerals and waste development of a temporary nature must include a restoration scheme that will result in the site being progressively restored to an acceptable condition and stable landform as soon as is practicable and provide for high quality aftercare arrangements including ongoing management and monitoring where necessary.

The after-use of a site will be determined in relation to the land-use context and surrounding environmental character (including wider ecological networks) and should take account of landowner interests and the requirements of the local community. Schemes should include objectives that will contribute towards: biodiversity gains, enhancement of the local environment and amenity, climate change mitigation and adaptation, benefits for the local community and economy (as appropriate).

Where relevant the restoration of the site must meet the following requirements:

Sites that are to be restored to the previous land-use must include a secondary after-use that includes environmental enhancement. Where a site is located within best and most versatile agricultural land, the land should be restored to a condition where the long-term potential of the land is safeguarded and soil resources are conserved, however this does not preclude the requirement for incorporating a secondary after-use.

Where specific and favorable conditions occur and when adjacent to identified habitat or designated asset(s), precedence must be given to environmental enhancement objectives, the creation of Biodiversity Action Plan habitat, ecological networks, promotion of geodiversity and enhancement of the historic environment.

Sites located within river corridors should address flood risk management and support River Basin Management Plan actions.

Sites located within or adjacent to the Chilterns Area of Outstanding Natural Beauty, Colne Valley Regional Park or the Green Belt should seek to enhance the characteristics and qualities for which the area was designated giving consideration to the provision of green infrastructure and opportunities for access and recreation.

Sites located within the Great Ouse Valley should support the Buckingham Canal restoration.

The restoration of sites for economic development purposes will be supported where fully in accordance with relevant planning policy and a secondary after-use is included that incorporates an ecologically beneficial after-use within the restored function.'

Land that has been worked and backfilled/landfilled takes time to settle. The site has not had planning permission to import putrescible waste and I believe Environment Agency permit similarly does not allow for this type of waste to be imported. As such there would not be the same settlement/gas/leachate concerns as there would be for municipal landfill.

It has however been restored for agricultural use and normally you would expect to have grass crops and only use light agricultural machinery/sheep to manage it for a few years, then slowly progress to more intensive cultivation over a period of several years. Partially this is to prevent compaction and damage to the replaced soils but I would still be concerned about the land being able to accommodate substantial buildings and structures just at the moment. This issue should be addressed directly and will be commented on by the Environment Agency.

The Environment Agency might also be concerned about any foundation methods that involved disturbing the fill material as the site is within a drinking water safeguarding zone (surface water) and partially within zone 3 (total catchment) for the abstraction of ground water.

Permissions at the site were also previously subject to legal agreements requiring monitoring of groundwater boreholes to ensure that the Black Park SSSI is not adversely affected by the mineral working.

LLFA / Buckinghamshire Sustainable Drainage Officer

(10.11.2020)

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

- Flood Risk Assessment & Drainage Strategy (ref. 1278-01, September 2020, Civic Engineers)
- Technical Note (ref. 1278.01, 06.11.2020, Civic Engineers)
- Indicative Drainage Details (drawing no. SK-3100, Rev. P01, 06.11.2020, Civic Engineers)
- Overland Flow Simulation / Long-term Flood Risk Comparison (drawing no. 1001 Rev. P01, 30.10.20 Civic Engineers)
- Existing Ground Elevation Heat Map (drawing no. EL-0301 Rev. P01, Oct 2020, Civic Engineers)
- Existing Catchment Plan (drawing no. 1001 Rev. RJW, Nov 2020, Civic Engineers)
- Masterplan 1 Proposed Drainage Layout (drawing no. MP1-3021 Rev. P01, Nov 20, Civic Engineers)

- Masterplan 2 Proposed Drainage Layout (drawing no. MP2-3071, P01, Nov 20, Civic Engineers)

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

Flood Risk

The FRA provides an extract of the Flood Map for Surface Water (FMfSW) which indicates that parts of the site lies in an area of high risk of surface water flooding (meaning there is a greater than 3.3% likelihood of flooding occurring in a given year). The site is a working quarry with some areas of excavation present on the site as detailed in section 2.3.1 of the FRA. In addition, some areas to the north of the site have been restored to greenfield. Both the current use of the site and the restoration that has taken place will influence the surface water flood risk to the site as referred to in 4.7.5 of the FRA. As set out in the technical note, further assessment of the local topography has been undertaken. This includes a surface water inundation plan which compares existing possible surface water overland flow routes against the Flood Map for Surface Water. Drawing no. 1001 Overland Flow Simulation / Long-term Flood Risk Comparison shows that there has been a local change in topography which as a result has altered the surface water pathways. Drawing no. 1001 also indicates the absence of off-site flow routes passing through the site area. The exercise does highlight the presence of a ditch network in the northern catchment which bisects the site west to east.

The Groundwater Flood Map (Jeremy Benn Associates, 2016), shows the groundwater level in the area of the proposed development to be at between 0.5m and 5m of the ground surface for a 1 in 100 year return period. This means that there is a risk of flooding to subsurface assets but surface manifestation of groundwater is unlikely. Further investigations, such as groundwater monitoring should take place prior to detailed design.

Surface water drainage

The FRA (5.5.2) suggests that due to the existing use, infiltration as a means of surface water disposal is not recommended due to contamination concerns. However, infiltration based SuDS could be used in the northern parcel of the site. I would advise that infiltration rate testing in accordance with BRE 365 should be conducted prior to a detailed design of the surface water drainage strategy. The next most practicable method of surface water disposal is a watercourse at a rate of 1.7l/s/ha (equivalent of 54l/s for the total site area). Following engagement with the drainage consultant, the location of surface water disposal has been revised due to the Existing Catchment Plan (drawing no. 1001) showing five sub-catchments across the site. It is intended to use four sub-catchment outfalls to manage surface water runoff from the site and discharge to nearby watercourses. This is in line with the drainage hierarchy subject to infiltration as a means of surface water disposal being demonstrated to be unviable at detailed design stage following infiltration rate testing in accordance with BRE 365 and groundwater monitoring.

It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Attenuation will provide in strategic swales and permeable paving across the site as shown on the Masterplan 1 Proposed Drainage Layout (drawing no. MP1-3021) and Masterplan 2 Proposed Drainage Layout (drawing no. MP2-3071). The technical note includes indicative storage requirements for both of the proposed masterplans. It is understood that the proposed storage volume provided is in excess of the required storage volume at this stage. I would encourage that attenuations storage is provided using multiple SuDS techniques that offer additional benefits such as water quality, biodiversity and amenity and that this approach is carried forward to detailed design. The Indicative Drainage Details (drawing no. SK-3100) show the typical design details for the proposed SuDS techniques, these principles should be carried through to detailed design. There is an opportunity to incorporate small scale SuDS with the proposed parking areas, these include rain gardens and bio-retention areas, this can assist in diversify the landscape and introducing additional green-blue

infrastructure within the site. I would encourage for further opportunities for SuDS to be investigated at detailed design.

In addition, a water quality assessment has been provided to show that a range of SuDS techniques are required to sufficiently manage pollution from the surface water runoff generated by the proposals. I would request the following condition(s) be placed on the approval of the application, should this be granted by the LPA:

Condition 1

Development shall not begin until a surface water drainage scheme for the site, based on sustainable drainage principles as set out in Flood Risk Assessment & Drainage Strategy (ref. 1278-01, September 2020, Civic Engineers) and Technical Note (ref. 1278.01, 06.11.2020, Civic Engineers) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- Assessment of above ground SuDS components as listed in the CIRIA SuDS Manual (C753) for the inclusion within the blue-green corridors within the site and the parking areas
- Water quality assessment demonstrating that the total pollution mitigation index equals or exceeds the pollution hazard index; priority should be given to above ground SuDS components
- The discharge rate should be limited to 1.7l/s/ha
- Calculations to demonstrate that the runoff volume in the 1 in 100 year, 6 hour rainfall event does not exceed the greenfield runoff volume for the same event
- Ground investigations including:
 - Infiltration in accordance with BRE365
 - Groundwater level monitoring over the winter period
- Where possible, surface water drainage should be managed by infiltration-based SuDS.
- Where required, floatation calculations based on groundwater levels encountered during winter monitoring
- SuDS approach as shown on Masterplan 1 Proposed Drainage Layout (drawing no. MP1-3021) and Masterplan 2 Proposed Drainage Layout (drawing no. MP2-3071)
- Full construction details of all SuDS and drainage components based on the principles shown on Indicative Drainage Details (drawing no. SK-3100)
- Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS component
- Calculations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.
- Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants, or to adjacent or downstream sites.

Reason: The reason for this pre-start condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 163 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

Condition 2

Development shall not begin until offsite drainage connections relating to the disposal of surface water runoff from the development have been agreed in writing by the Local Planning Authority in consultation with the relevant authorities. Details including capacity, condition and accompanying offsite drainage plan must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the site can adequately drain without causing an increase in flood risk both on site and off site, this is in line with Paragraph 163 of the National Planning Policy Framework.

Condition 3

Prior to the occupation of the development a whole-life maintenance plan for the site must be submitted to and approved in writing by the Local Planning Authority. The plan shall set out how and when to maintain the full drainage system (e.g. a maintenance schedule for each drainage/SuDS component), with details of who is to be responsible for carrying out the maintenance. The plan shall also include as-built drawings and/or photographic evidence of the drainage scheme carried out by a suitably qualified person. The plan shall subsequently be implemented in accordance with the approved details.

Reason: The reason for this prior occupation condition is to ensure that arrangements have been arranged and agreed for the long term maintenance of the drainage system as required under Paragraph 165 of the National Planning Policy Framework.

Informative

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

Buckinghamshire Heritage Officer

(06.11.20)

Summary

The development would result in less than substantial harm to the setting of a designated heritage asset and should be balanced against the public benefits of the scheme in line with local and national policy. The use of heritage contributions for the conservation of the onsite heritage assets should be considered as part of any future application or S106 agreement. Regularisation of identified unauthorised works should also be pursued.

Heritage Assets

The following designated heritage assets are likely to be affected and have been identified due to their proximity to the development site:

- Little Coppice – Grade II Listed Building
- Langley Park – Grade II Registered Park and Garden & associated Listed Buildings.
- Heatherden Hall and associated structures including Lodge, Gates, Gate Piers & Ornamental Garden structures – Grade II Listed Building
- St Margaret's Church, Iver – Grade II Listed Building

The heritage assessment is the impact on the special architectural and historic interest of the listed buildings including their settings and the impact on the significance of the registered park and garden.

Significance

The site lies in close proximity to a number of designated heritage assets. 'Built Heritage' is identified as one of the technical disciplines not considered likely to be affected by the proposals and has therefore been 'scoped out' of the EIA at this outline stage. The Heritage Team consider there would be impact on heritage and significance of each identified asset is considered below:

Little Coppice

Little Coppice is a Grade II Listed Building which lies c.100m east of the development site. The dwelling sits on the east side of Pinewood Road and is set back from the highway along a private driveway.

The house was designed by the preeminent arts and crafts architect Charles Robert Ashbee and was completed in 1903-4. The 'Voysey' inspired design is characterised by the whitewashed roughcast render with imitation slate pyramid roof and central brick stack. The building's feature roofscape includes flat topped leaded light dormers to 3 sides and sloping buttresses to corners and pair to centre of each front. The prominent west frontage has a plank door and 2-light leaded windows to centre bay, 2-light and single light windows to left and small larder window to right.

There are a number of key viewpoints of the listed building from across the development site and from the public right of way within Black Park. The driveway creates a well defined channelled vista towards the development site. The listed building's prominence makes it a local landmark and a strong visual receptor from the parkland. The building's heavily treed backdrop and verdant open and semi rural setting to the east gives it a sense of isolation.

In light of the above, the building carries significance through its historic value, aesthetic value, architectural value and rarity, its setting contributes to this because of the views and sense of isolation.

Heatherden Hall & Associated Structures

Heatherden Hall lies to the south of the original Pinewood East complex and is a Grade II Listed archetypal late-Edwardian country mansion. The Hall is located c.300m north of the development site separated by a mature tree belt and the formal gardens. The house dates to c.1865 and was design by architect Charles Frederick Reeks (also attributed to St Margaret's Church at Iver Heath) and greatly enlarged in 1914-28 by Melville Seth-Ward. The house was built for the wealthy and politically ambitious Canadian financier (and later Conservative MP) Walter Grant Morden. The house has been in use since 1935 as a country club associated with Pinewood Studios and remains a key site in the history of the British film industry. Heatherden Hall itself has been frequently used as a film location, as well as to accommodate visiting actors, directors and production staff.

The building is characterised by its French-Classical formality, but described as having a loosely Italianate composition with formal and polite stuccoed and painted brickwork, it has a slate roof concealed behind parapet. The building's interior suites are luxurious and well-preserved including a double height ballroom and swimming pool. The formalised gardens also include various urns, a bridge and niches along with the original entrance lodge off Pinewood Road. These structures likely form part of the curtilage to the principal listed hall and can be considered as part of the grade II listed entity.

In light of the above, the building carries significance through its architectural, historic, aesthetic and social and communal value and through its rarity. Its setting contributes as identified above; due to the formality of the grounds and close interrelationship with the studios as a functional entity.

St Margaret's Church

The Grade II Listed Church lies c. 350m south-east of the development site. The building dates to 1860, again by local named architect Charles Frederick Reeks. The building is characterised by its flint with stone dressings, tower with battlements and traceried bell openings. The church has five window nave with two 2-light west windows and cusped trefoil over. Timber south porch. 3-light east window to chancel with coped gables. This landmark ecclesiastical building carries significance through its architectural, historic, aesthetic and communal value and rarity.

Langley Park & Associated Listed Buildings

The grade II park and garden lies to the south side of Uxbridge Road c.250m south-west of the development site. The park is an C18th landscape designed by Lancelot Brown on the site of a medieval deer park surrounding an C18th country house with C19th pleasure grounds and gardens. The extent of the parkland includes the separately grade II listed rusticated stone gate piers with large ball finials and iron gates and railings.

Proposal

The proposals facilitate the development of c.750,000 sq ft (69,677sq m) of buildings broken down into a visitor attraction, education and business growth hubs and production studios expansion, 2,341 parking spaces, 25 bus spaces, cycle parking, servicing and access, and green infrastructure.

The visitor attraction would comprise one or more (up to 10) individual or interconnected buildings. The production studio would comprise a series of buildings of different forms. The education and business growth hubs would comprise one or more individual or interconnected buildings up to five main structures.

The outline application with all matters reserved except for principal points of access includes two indicative masterplan options and high level design principles set out within the various accompanying suite of documents.

Site Context

The development site currently consists of open fields and is bounded to the north by the existing Pinewood Studios, to the west by Black Park Country Park, to the south by the A412 Uxbridge road and to the east by Pinewood road.

The site has been the subject of quarrying and subsequent land fill but largely consists of verdant green open space falling within the Colne Valley Regional Park. The site lies within the Green Belt and is therefore underpinned by the prevailing objective of preventing urban sprawl and by keeping land permanently open and undeveloped.

The development site is predominantly flat and well contained through established hedgerows and planting along Pinewood Road, the vast mature parkland backdrop of Black Park and the development along Uxbridge Road to the south.

The existing studio complex to the north of the site has two primary groupings and character areas 'Pinewood West' and 'Pinewood East'. Pinewood West is largely characterised by ad-hoc development of a fairly informal and sporadic nature. There are a variety of building typologies, styles and construction techniques on offer creating an honest authenticity to this area and a strong sense of place and local distinction. This rather attractive light industrial character is created through a number of prevailing features and design cues including:

- The variation in grain, density and heights creating a rich layering of buildings, spaces and viewpoints.
- The 1930's almost art deco nuances such as brick piers, banding and parapets.
- Many of the studios having brickwork or solid masonry plinths with cladded upper levels or lighter finishes.
- The variation and roofscape level with examples of gables, mansards and flat roofs.
- The creation of vestibules, corridors and open covered areas in and around the studios.
- There is also a sense of the development and evolution of film industry within Pinewood West which creates heritage interest in its own right and is reflected in the street naming and signage throughout.

Pinewood East is the more modern studio counterpart and creates somewhat of a contrast to the characteristics identified above. The area has a more formulaic morphology, planned layout of identikit structures and uniformity of heights, scale, massing and finishes. This gives the area a much more clinical outlook and fails to provide the same richness of experience and any tangible sense of place.

Indicative Masterplan and Layout – Design and landscaping

The layout of both masterplans rely on one access point off the Uxbridge Road and three access points off the Pinewood Road. The majority of the built form is grouped towards the central and western portions of the site with parking to the southern and eastern areas.

Both illustrative masterplans identify large groupings of buildings of a more regimented grain and scale than Pinewood West but somewhat less formulaic than Pinewood East. The morphology would therefore indicate a character of development somewhere between the two existing complexes.

As outlined above, the clustering of mixed building heights and volumes provides greater visual interest and richness to the environment rather than depending on formulaic and prescriptive development which cannot easily be broken or layered. Given the closer relationship of the site to Pinewood West, aligning the design cues and development typology here would offer a greater sense of connection and contextual reaction. The design rationale behind the current masterplan remains somewhat unclear and it would be beneficial to see the process which has led to the current preferred options.

The outline buildings heights provided offer a degree of variation with the tallest elements being up to 21.5m associated with the visitor attraction and production studio. Along the edges of the visitor attraction and production studio that border the central element of the site, the maximum height will be 9.2m. The maximum height of the education and business hub will be 14.5m.

The masterplan does continue to provide a sense of containment through the use of green/blue infrastructure boundary treatments and buffering. This buffering and the extensive use of integrated landscaping throughout the site is imperative to ensuring any sense of the sites verdant character is retained.

From a design perspective and heavy reliance on large expanses of surface level car parking is a concern and these extensive areas of parking would seem to be the dominant characteristic of the site. The parking strategy and layout has not been adequately justified through the submission and there is little evidence of any alternative options being explored.

The masterplan also includes a number of entrance features and arrival points which will be prominent from the streetscene. These entranceways should again be complemented with robust landscaping.

In light of the above, the fundamental characteristics of the site would change significantly as a result of the proposed development including significant loss of open space and loss of the verdant and semi rural landscape character.

Heritage Impact

As outlined above, views of the site are typically in close proximity from within its boundaries and the roadside vegetation along Pinewood Road and Uxbridge Road, which includes hedgerow and some mature trees, provide filtered screening from outside the site.

The heritage assets identified at Langley Park and St Margaret's Church have sufficient separation distance and the presence of intervening development ensures the setting of these assets will not be affected by the proposed development.

The identified heritage assets at Little Coppice and Heatherden Hall do however require more detailed consideration of the nature and level of impact at this outline stage.

Little Coppice

Little Coppice continues to be a strong visual presence from Pinewood Road and from across the development site from key public vantage points along the public right of way within Black Park. The building's feature pyramidal roof and 'Voysey' inspired design makes a significant contribution to the character and appearance of the area. The building is particularly prominent due to the channelled vista created by the driveway and mature tree backdrop.

The proposed development would obscure any such viewpoints of the listed building or its associated outbuildings from Black Park. The development would sit in the foreground of the buildings driveway vista and erode the currently open verdant views looking westwards from the buildings frontage.

The development would therefore truncate the buildings sense of isolation, its semi rural setting and obscure one of the building's key public vantage points, to which it is currently enjoyed and experienced. To this end, the heritage team must conclude that the proposed development would result in less than substantial harm to the setting of the listed building.

Heatherden Hall

As the grade II country house and gardens lie within the wider site confines and would be impacted by the increase in intensification and visitor/user pressure, it should therefore be a key consideration at this outline stage.

The northern boundary of the site contains a tree belt with mature oaks to the west and some newly planted trees to the east. This does provide sufficient visual separation of the Hall to the wider site to ensure there will be no direct visual impact on the setting of the heritage asset from the proposal development. The masterplans does indicate improved linkages between the development site the proposed hubs and Heatherden Hall which could potentially open up views and access which would need careful consideration at reserved matters stage. The gardens currently have a private and intimate feel would could be harmed by any such change.

Having visited the site and inspected the external envelope of the listed building, it would appear that a number of uPVC windows have been installed primarily to the upper levels of the principal listed building without the benefit of consent. These inappropriate and potentially unauthorised works should be addressed through an application for the reinstatement of timber windows in accordance with the original specification and those remaining precedents.

The general condition of the Hall appears somewhat tired and there were evidential areas of deterioration to the building's paintwork, areas of staining and cracking to the stucco fabric. The associated curtilage structures within the garden also appeared somewhat neglected. The investment into the site should also give rise to the listed buildings proper maintenance and conservation. It is therefore recommended that a heritage contribution be set aside to secure Heatherden Halls upkeep as part of any future planning obligations.

Heritage Policy Assessment

The Planning (Listed Building and Conservation Areas) Act 1990 The proposals would not preserve the architectural or historic interest of the listed building at Little Coppice and therefore does not comply with section 66 of the Act.

NPPE

The proposal due to the reasons identified above would cause less than substantial harm to the significance of the designated heritage asset noted above and therefore Paragraph 196 applies.

‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’.

In considering the heritage impact, consideration should also be given to:

Paragraph 131 which identifies the importance of design: ‘In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings’.

Paragraph 190 which considers the impact on setting and minimising conflict: ‘Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal’.

Paragraph 194 which requires clear and convincing justification: ‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’.

Local Plan

The less than substantial harm identified needs to be considered in light of Core Strategy (2011) Policy CP8 (Built and Historic Environment):

‘All new development must be of a high standard of design and make a positive contribution to the character of the surrounding area’.

‘New development should be designed to help tackle the causes of, and be resilient to the effects of, climate change’.

Consideration should also be given to the emerging local plan policy:

DM DP2: Where a development proposal will lead to less than substantial harm to a designated heritage asset, this harm must be weighed against the public benefits of the proposal. The justification for this harm should be set out in full in the heritage assessment.

Conclusion

The application would result in ‘less than substantial harm’ to the heritage assets and should therefore be weighed against the public benefits of the scheme in accordance with the policy objectives outlined above.

Buckinghamshire Archaeology Officer

(15.11.21 response below, original comments 22.12.20)

Thank you for re-consulting the Buckinghamshire Council Archaeological Service on the above proposal. We maintain the local Historic Environment Record and provide expert advice on

archaeology and related matters. As you will be aware, Paragraph 194 of the National Planning Policy Framework (NPPF) states that information held in the relevant historic environment record should be consulted and expert advice obtained where necessary. The NPPF recognises that the effect of an application on the significance of a heritage asset (including its setting) is a material planning consideration. Paragraph 199 says that there should be great weight given to the conservation of designated heritage assets, whilst paragraph 200 extends this provision to non-designated heritage assets with an archaeological interest equivalent to that of scheduled monuments.

Historic Environment Record (HER) information

We have consulted the Buckinghamshire Historic Environment Record (HER) and note that the following records are relevant:

HER reference	Designation Status*	Description
0689200000	PLN	Field N of Warren House: Two rectangular enclosures or field boundaries visible on aerial photographs from 1989 north of Warren House
0150500000	PLN	STRAWBERRY WOOD, BLACK PARK: Linear earthwork found in Strawberry Wood, Black Park and thought to either be a Roman road or a medieval parish boundary bank
0991800000	HER	Areas 2 & 3, Project Pinewood Site: Possible ditched settlement enclosures, pits and field boundary ditches found by geophysical survey but not confirmed by subsequent trial trenching.
0995700000	PLN	Area 4, Chandlers Hill: Iron Age to medieval pits, ditches, and sunken featured building identified by geophysical survey and excavation

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

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

Archaeological and related interests

We recognise that much of the proposed development site has been subject to quarrying and this activity would have significantly impacted any buried archaeological assets; however, the Environmental Statement recognises that there are small areas where ground works were not undertaken. The HER records features and finds from several periods in the vicinity and we would expect the areas of previously undisturbed ground to have archaeological evaluation in the form of trial trenching to assess the buried archaeological potential of these areas and the extent and significance of any remains. This work could be undertaken by condition and could lead to further investigation.

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

No development shall take place, unless authorised by the Planning Authority, until the applicant, or their agents or successors in title, have undertaken archaeological evaluation in form of trial trenching in areas of previously undisturbed ground, in accordance with a written scheme of

investigation which has been submitted by the applicant and approved by the planning authority. This work may lead to further investigation in the form of an excavation.

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

Ecology

(24.11.21 comments replicated below, earlier consultee comments dated 15.01.21 and 04.03.21)

Summary

These ecology comments follow the submission of further ecological information and follow up meetings. These comments build upon the previous ecological comments; the most recent previous comments were made on 19th March 2021.

The new and updated surveys are now considered to bring the ecological understanding of the site up to a level where potential impacts can be assessed.

There are some areas where more detail would be desirable to consider at this stage, but it will be possible to secure appropriately details through conditions and a s106.

Documents Referenced

Chapter 8 of the Environmental Statement
Framework Bat Mitigation Strategy (FBMS)
Framework Bat Mitigation Strategy Plan
Framework Lighting Strategy (Appendix 4.1)
Appendix 8.1 Extended Phase 1 Habitat Survey Report
Appendix 8.2: Badger Survey Report
Appendix 8.3: Bat Survey Report
Appendix 8.4: Reptile Survey Report
Appendix 8.5: Biodiversity Net Gain Report
Appendix 8.8: Bechstein Bats Radiotracking Survey.

Comments

Introduction:

I have addressed each of the documents in my comments in the order which they are referenced above. The recommendations follow the comments and combine consideration of all of the documents and previous comments.

Chapter 8 of the Environmental Statement

Most effects of nationally and internationally designated sites have been scoped out, however, potential Air Pollution Effects on Kingcup Meadow and Oldhouse Wood SSSI, are considered, following further analysis it was determined that the increases in air pollution would be negligible and not significant.

Recreational disturbance effects on Black Park SSSI were considered and some measure are proposed to mitigate this, this includes the following in para 8.132:

- Design which ensures that local residents are aware of and can utilise the permissive path in line with current baseline visitation levels, but which does not promote or enable access to Black Park for those arriving by car;
- Parking restrictions which prevent visitor parking being utilised for access to Black Park;

- Design which prevents direct access from visitors to the proposed scheme during operation;
- Financial contribution to management of recreational pressures within Black Park, with any such contribution being proportionate to the contribution of increased visitation.

Bats - the wider Study Area including internal and peripheral tree lines and woodland are crucial in maintaining a regularly occurring population of an internationally/nationally important species or a species in a Local BAP which is important for the maintenance of the viability of the feature at a district level.

Two separate sets of surveys have investigated bats. An original set of surveys which considered bats on site and then further surveys, including capture and radio tracking of Bechstein bats, confirmed that the northern internal tree line provides an important movement corridor for Bechstein bats and other species.

The operational effects on Bechstein's Bats (which are a rare and internationally/nationally important species) as well as other species has been considered and negative impacts are considered avoidable through:

- The design and management of lighting (para 8.85)
- Enhancement of the northern tree line with additional planting (para 8.149)
- The monitoring of the bat population throughout the operation of the proposed development (para 8.149), it is not explicit here but this will need to include monitoring in the neighbouring Black Park.
- The creation of dark corridors (para 8.99) through the site's green infrastructure which Bechstein's will be reliant on to commute to foraging areas to the east.

The minimisation of the width of the access through the northern hedgerow for access between the proposed and existing site to the north (para 8.101)

- The installation of bat boxes on retained trees and incorporated into buildings (para 8.146 and 8.147)

The construction effects of bats will also be controlled through details which will be contained within a Construction Environmental Management Plan (CEMP), many of these are mentioned in para 8.101. Further enhancement measures which are not mentioned in the ES have also been discussed and will need to be secured, a financial contribution to works to benefit Bechstein's in Black park through a s106, and further studies and resultant reductions to lighting at Pinewood Studios in areas sensitive for bats.

The construction and operational effects on birds are considered. In most cases these can be avoided, mitigated, compensated for and an enhancement achieved through measures which can be included in a CEMP and in a mitigated, compensated and enhancement strategy (para 8.109). Enhancement might include provision of nesting habitat for a range of species including, but not limited to, mistle and song thrush, house sparrow, starling, swift, and spotted flycatcher.

However, the impacts upon the ground nesting birds: at least three pairs of lapwing and one pair of skylark (priority species as red listed Birds of Conservation Concern (BoCC)) cannot be compensated for on-site without the inclusion of suitable open spaces (para 8.106).

Paragraph 8.111 claim that providing nesting opportunities for other species compensates for the loss of sky lark and lapwing. This is clearly not correct. The loss of one priority species cannot be compensated for by providing for others which are not present on the site. Compensation must be provided for the same species.

The necessary openspace and habitat could in theory be incorporated on to green roofs. A previous Pinewood Studios application included green roofs and this has been shown to be a great success and has provided good compensation for Skylarks. The documents below give more details about it:
<https://cieem.net/wp-content/uploads/2019/03/No.-3-Zoe-Webb-Pinewood-Studios.pdf>
<https://www.sky-garden.co.uk/news/sky-garden-wins-ecology-award-for-pinewood.php>

The application is at outline stage and so there is still potential for green roofs to be incorporated into the design. However, it may also be possible for a suitable financial contribution to enable compensation to be provided off site, this has previously been secured as compensation on other sites within Buckinghamshire.

Boundary features including hedgerows and treelines supported a typical range of common and widespread species, these are to be retained in the most part and there will be buffering which has the potential to enhance them.

A hunting barn owl was recorded within the Site on a single occasion in late summer. The fact it was only recorded once does not mean that it does not use the site more regularly. Compensation for the loss of foraging habitat is not considered in the ES although further conversations have indicated that it might be inappropriate to attract barn owls to the site through the installation of owl boxes and so it might be more appropriate for a financial contribution to be made to an offsite scheme.

Surveys completed in August-September 2020, and April, May, June and July 2021 confirmed a good population of slow worm and low populations of common lizard and grass snake.

Most grass snake records related to juveniles indicating that breeding sites for this species are likely to occur at the site periphery or within adjacent habitats.

Surveys confirmed that reptile populations were focused to suitable habitats at the site periphery.

The site is considered to support a very small, but viable, population of a nationally important species, and is likely to be important for the maintenance of the local meta-population. In summary, the Study Area is assessed as being of Local importance for reptiles. Mitigation measures are suggested in paragraph 8.115 and the green infrastructure network provides opportunities for enhancements.

Mitigation for Badgers can be conditioned as Badger setts have not been found on site but there is evidence that badgers use the site. See paragraphs 8.92 and 8.93

8.142 I disagree that there will be a significant beneficial effect for habitats at the district level. I would assess a 10% biodiversity net gain as being relatively minor. It has been widely established that 10% is a safe threshold to ensure that a net gain is delivered in practice and therefore it cannot be claimed that this is significant.

8.159 Disagree with moderate significant benefit for habitats, will only be minor.
Summary table at the end does not address lapwing and sky lark!

Framework Bat Mitigation Strategy (FBMS) and Framework Bat Mitigation Strategy Plan:

Mitigation measures:

- Increasing the extent of bat foraging and commuting habitat, including retention of the Peace Path corridor and the creation of buffer zones
- Sensitive lighting within buffer areas
- Provision of bat boxes and roosting features
- Timing and location of construction activity

Green infrastructure around edge of development (for BNG and good quality habitat creation)
Retention of Peace Path green corridor, it does not explain how it will be kept dark and functional?
Additional buffers in above areas to be planted (woodland and scrub) and apparently also have water added, however it is not clear where this is shown.

Para 13 says the 'need' for lighting will be minimised. This is not the same as lighting being minimised and this does not accord with what is shown on plan, notably, the back area and parking adjacent to peace path.

It states that dark zones are to respond to Framework Lighting Strategy and guidance. However, the Framework Lighting Strategy is imprecise and pulls in various other considerations which can conflict with the requirement for dark areas for bats.

The usual Bat boxes and CEMP is suggested. These will of course be required.

Additional enhancement measures:

1. Gap filling planting in peace path,
2. Black park management – thinning to support oaks esp close to roost. *(Use of financial contribution for this has been suggested. This seems inappropriate as the financial contribution is related to the recreation impacts on the SSSI. Not enhancements for the bats.*
3. Reducing existing lighting. Could this be secured through a s106?

It is suggested that measures are taken forward through detailed design of SHUK and a EMP.

The Framework Bat Mitigation Plan shows some positive measures, such as the widened peace path corridor but also some negative suggestions such as positioning the backlot adjacent to both the peace path and Black park, it is assumed that this would need lots of lighting and so this position is incompatible with bats.

Appendix 8.8: Bechstein Bats Radiotracking Survey

Due to the significance of the peace path feature, it requires careful protection and management to ensure that the ecological functionality of this feature is retained for use by bats. An increased buffer zone is to be included within this area in addition to a commitment for this area to be managed solely for ecological benefit and the bat commuting route.

Of the 10 bats tracked (18.8% of the colony) 5 used the peace path for commuting. This is 83% of the adult females and 80% of the breeding females tracked. This highlights the importance of the Peace Path for the survival of the colony.

Management, buffering, removing public access, additional planting, creation of a dark corridor.

Framework lighting strategy Appendix 4.1

Document is high level and does not give clear prioritisation to specific considerations. Instead it covers a range of different considerations and as a result gives no certainty to how a detailed lighting design would be produced. The framework mentions issues which are in conflict with each other, such as the need to design for bats which require darkness and also the need to consider security and car parking which need lighting. Therefore, it is not possible to determine whether a detailed design based upon it would be suitable for bats.

The framework level document should set out in clear terms, what the constraints to lighting are from an ecological perspective and set out areas which will be kept dark.

The current document puts the onus on the council to apply strong conditions which set out the parameters and to understand and amend lighting within the existing studios.

If the development is not to have a significant negative ecological impact, the mitigation needs to be have clear objectives.

The document comes to the conclusion that the lighting impacts can be adequately addressed, without properly identifying what the potential ecological impacts could be.

It is likely that a lighting design which is appropriate from an ecological perspective, would be pressured to compromise for other competing lighting objectives. It would be much better for a common understanding of potential lighting impacts and needs to be understood prior to determination. However, it may be possible to put some tight requirements on to a permission through conditions which not only control lighting but also control the location of uses which might need lighting.

Appendix 8.1 Extended Phase 1 Habitat Survey Report

In the most part the phase 1 seem acceptable. I can't find the following target notes on the plan: 12, 20,

Appendix 8.2: Badger Survey Report

Disused badger sets and used latrines and snuffle holes identified around the edge of the site. Fairly standard mitigation measures will be acceptable. As their signs have been identified on site but there are currently no identified setts, it is appropriate for further surveying to be carried out prior to commencement to inform mitigation (and perhaps licencing) requirements.

Appendix 8.3: Bat Survey Report

Two Soprano Pipistrelle bat roosts were found within the site.

The boundaries were found to have moderate levels of bat foraging and commuting activity and the Peace Path green corridor and another hedgerow towards the south were considered to be of particular importance for bats. It is suggested that there are many opportunities to enhance the site for bats.

Appendix 8.4: Reptile Survey Report

A large population of slow worm and low populations of grass snake and common lizard are present. Mitigation and enhancement measures can be designed into the scheme, this can be dealt with by condition.

Appendix 8.5: Biodiversity Net Gain Report

The biodiversity metric records the condition of habitats on site and those which would be created following restoration. Given the fact that the site used to be a minerals and waste site, permissions for that use required restoration. However, the restoration plans associated with the previous permissions give no indication of the habitat to be created on the majority of the area, although there is a presumption that the site will be returned to agricultural use. Details for restoration are given which show some small areas as having planting of woody vegetation. It is understood that these areas have been planted and accounted for in the baseline condition.

It is understood that the restoration condition of the site is what is to be considered as the base line, as such there are questions which need to be asked with regards to the intended quality of restored habitats. It is accepted that for the majority of the area there can be no expectation of habitats of particularly high quality being created, however, where areas of woody vegetation have been planted as part of the restoration, it would be expected that they would reach a good condition habitat condition.

Therefore, it will be appropriate to reconsider the condition and distinctiveness of baseline habitats in more detail as part of the reserve matters.

Particular areas for further explanation with regards to the baseline habitats relate to how woodland is assessed with regards to deer browsing and how the diversity of age structure is considered with regards the size of plants on the edge. Further consideration might also be necessary with regards to how the woodland belt along the northern edge of the site is identified. The submitted report and metric account for them as two lines of hedgerow and an area of scrub where as it is more likely that

it should be identified as a strip of woodland as it is between approximately 15 and over 30 metres wide and this is much wider than a hedge would normally be.



Figure 1. Aerial photo of woodland belt along the peace path.

It is highly likely that this would score quite differently as the aerial photos show that there are areas of young trees and also old trees with deadwood.

The low valuation of the baseline habitats means that it is relatively easy to secure an onsite biodiversity net gain. However a re-evaluation of the baseline may reduce the anticipated net gain.

Introduction:

I have addressed each of the documents in my comments in the order which they are referenced above. The recommendations follow the comments and combine consideration of all of the documents and previous comments.

Chapter 8 of the Environmental Statement

Most effects of nationally and internationally designated sites have been scoped out, however, potential Air Pollution Effects on Kingcup Meadow and Oldhouse Wood SSSI, are considered, following further analysis it was determined that the increases in air pollution would be negligible and not significant.

Recreational disturbance effects on Black Park SSSI were considered and some measure are proposed to mitigate this, this includes the following in para 8.132:

- Design which ensures that local residents are aware of and can utilise the permissive path in line with current baseline visitation levels, but which does not promote or enable access to Black Park for those arriving by car;
- Parking restrictions which prevent visitor parking being utilised for access to Black Park;
- Design which prevents direct access from visitors to the proposed scheme during operation;
- Financial contribution to management of recreational pressures within Black Park, with any such contribution being proportionate to the contribution of increased visitation.

Bats - the wider Study Area including internal and peripheral tree lines and woodland are crucial in maintaining a regularly occurring population of an internationally/nationally important species or a species in a Local BAP which is important for the maintenance of the viability of the feature at a district level.

Two separate sets of surveys have investigated bats. An original set of surveys which considered bats on site and then further surveys, including capture and radio tracking of Bechstein bats, confirmed that the northern internal tree line provides an important movement corridor for Bechstein bats and other species.

The operational effects on Bechstein's Bats (which are a rare and internationally/nationally important species) as well as other species has been considered and negative impacts are considered avoidable through:

- The design and management of lighting (para 8.85)
- Enhancement of the northern tree line with additional planting (para 8.149)
- The monitoring of the bat population throughout the operation of the proposed development (para 8.149), it is not explicit here but this will need to include monitoring in the neighbouring Black Park.
- The creation of dark corridors (para 8.99) through the site's green infrastructure which Bechstein's will be reliant on to commute to foraging areas to the east.
- The minimisation of the width of the access through the northern hedgerow for access between the proposed and existing site to the north (para 8.101)
- The installation of bat boxes on retained trees and incorporated into buildings (para 8.146 and 8.147)

The construction effects of bats will also be controlled through details which will be contained within a Construction Environmental Management Plan (CEMP), many of these are mentioned in para 8.101. Further enhancement measures which are not mentioned in the ES have also been discussed and will need to be secured, a financial contribution to works to benefit Bechstein's in Black park through a s106, and further studies and resultant reductions to lighting at Pinewood Studios in areas sensitive for bats.

The construction and operational effects on birds are considered. In most cases these can be avoided, mitigated, compensated for and an enhancement achieved through measures which can be included in a CEMP and in a mitigated, compensated and enhancement strategy (para 8.109). Enhancement might include provision of nesting habitat for a range of species including, but not limited to, mistle and song thrush, house sparrow, starling, swift, and spotted flycatcher.

However, the impacts upon the ground nesting birds: at least three pairs of lapwing and one pair of skylark (priority species as red listed Birds of Conservation Concern (BoCC)) cannot be compensated for on-site without the inclusion of suitable open spaces (para 8.106).

Paragraph 8.111 claim that providing nesting opportunities for other species compensates for the loss of sky lark and lapwing. This is clearly not correct. The loss of one priority species cannot be compensated for by providing for others which are not present on the site. Compensation must be provided for the same species.

The necessary openspace and habitat could in theory be incorporated on to green roofs. A previous Pinewood Studios application included green roofs and this has been shown to be a great success and has provided good compensation for Skylarks. The documents below give more details about it:

<https://cieem.net/wp-content/uploads/2019/03/No.-3-Zoe-Webb-Pinewood-Studios.pdf>
<https://www.sky-garden.co.uk/news/sky-garden-wins-ecology-award-for-pinewood.php>

The application is at outline stage and so there is still potential for green roofs to be incorporated into the design. However, it may also be possible for a suitable financial contribution to enable compensation to be provided off site, this has previously been secured as compensation on other sites within Buckinghamshire.

Boundary features including hedgerows and treelines supported a typical range of common and widespread species, these are to be retained in the most part and there will be buffering which has the potential to enhance them.

A hunting barn owl was recorded within the Site on a single occasion in late summer. The fact it was only recorded once does not mean that it does not use the site more regularly. Compensation for the loss of foraging habitat is not considered in the ES although further conversations have indicated that

it might be inappropriate to attract barn owls to the site through the installation of owl boxes and so it might be more appropriate for a financial contribution to be made to an offsite scheme.

Surveys completed in August-September 2020, and April, May, June and July 2021 confirmed a good population of slow worm and low populations of common lizard and grass snake.

Most grass snake records related to juveniles indicating that breeding sites for this species are likely to occur at the site periphery or within adjacent habitats.

Surveys confirmed that reptile populations were focused to suitable habitats at the site periphery. The site is considered to support a very small, but viable, population of a nationally important species, and is likely to be important for the maintenance of the local meta-population. In summary, the Study Area is assessed as being of Local importance for reptiles. Mitigation measures are suggested in paragraph 8.115 and the green infrastructure network provides opportunities for enhancements.

Mitigation for Badgers can be conditioned as Badger setts have not been found on site but there is evidence that badgers use the site. See paragraphs 8.92 and 8.93

8.142 I disagree that there will be a significant beneficial effect for habitats at the district level. I would assess a 10% biodiversity net gain as being relatively minor. It has been widely established that 10% is a safe threshold to ensure that a net gain is delivered in practice and therefore it cannot be claimed that this is significant.

8.159 Disagree with moderate significant benefit for habitats, will only be minor.
Summary table at the end does not address lapwing and sky lark!

Framework Bat Mitigation Strategy (FBMS) and Framework Bat Mitigation Strategy Plan:

Mitigation measures:

- Increasing the extent of bat foraging and commuting habitat, including retention of the Peace Path corridor and the creation of buffer zones
- Sensitive lighting within buffer areas
- Provision of bat boxes and roosting features
- Timing and location of construction activity

Green infrastructure around edge of development (for BNG and good quality habitat creation)

Retention of Peace Path green corridor, it does not explain how it will be kept dark and functional?

Additional buffers in above areas to be planted (woodland and scrub) and apparently also have water added, however it is not clear where this is shown.

Para 13 says the 'need' for lighting will be minimised. This is not the same as lighting being minimised and this does not accord with what is shown on plan, notably, the back area and parking adjacent to peace path.

It states that dark zones are to respond to Framework Lighting Strategy and guidance. However, the Framework Lighting Strategy is imprecise and pulls in various other considerations which can conflict with the requirement for dark areas for bats.

The usual Bat boxes and CEMP is suggested. These will of course be required.

Additional enhancement measures:

4. Gap filling planting in peace path,
5. Black park management – thinning to support oaks esp close to roost. *(Use of financial contribution for this has been suggested. This seems inappropriate as the financial contribution is related to the recreation impacts on the SSSI. Not enhancements for the bats.*
6. Reducing existing lighting. Could this be secured through a s106?

It is suggested that measures are taken forward through detailed design of SHUK and a EMP.

The Framework Bat Mitigation Plan shows some positive measures, such as the widened peace path corridor but also some negative suggestions such as positioning the backlot adjacent to both the peace path and Black park, it is assumed that this would need lots of lighting and so this position is incompatible with bats.

Appendix 8.8: Bechstein Bats Radiotracking Survey

Due to the significance of the peace path feature, it requires careful protection and management to ensure that the ecological functionality of this feature is retained for use by bats. An increased buffer zone is to be included within this area in addition to a commitment for this area to be managed solely for ecological benefit and the bat commuting route.

Of the 10 bats tracked (18.8% of the colony) 5 used the peace path for commuting. This is 83% of the adult females and 80% of the breeding females tracked. This highlights the importance of the Peace Path for the survival of the colony.

Management, buffering, removing public access, additional planting, creation of a dark corridor.

Framework lighting strategy Appendix 4.1

Document is high level and does not give clear prioritisation to specific considerations. Instead it covers a range of different considerations and as a result gives no certainty to how a detailed lighting design would be produced. The framework mentions issues which are in conflict with each other, such as the need to design for bats which require darkness and also the need to consider security and car parking which need lighting. Therefore, it is not possible to determine whether a detailed design based upon it would be suitable for bats.

The framework level document should set out in clear terms, what the constraints to lighting are from an ecological perspective and set out areas which will be kept dark.

The current document puts the onus on the council to apply strong conditions which set out the parameters and to understand and amend lighting within the existing studios.

If the development is not to have a significant negative ecological impact, the mitigation needs to be have clear objectives.

The document comes to the conclusion that the lighting impacts can be adequately addressed, without properly identifying what the potential ecological impacts could be.

It is likely that a lighting design which is appropriate from an ecological perspective, would be pressured to compromise for other competing lighting objectives. It would be much better for a common understanding of potential lighting impacts and needs to be understood prior to determination. However, it may be possible to put some tight requirements on to a permission through conditions which not only control lighting but also control the location of uses which might need lighting.

Appendix 8.1 Extended Phase 1 Habitat Survey Report

In the most part the phase 1 seem acceptable. I can't find the following target notes on the plan: 12, 20,

Appendix 8.2: Badger Survey Report

Disused badger sets and used latrines and snuffle holes identified around the edge of the site. Fairly standard mitigation measures will be acceptable. As their signs have been identified on site but there are currently no identified setts, it is appropriate for further surveying to be carried out prior to commencement to inform mitigation (and perhaps licencing) requirements.

Appendix 8.3: Bat Survey Report

Two Soprano Pipistrelle bat roosts were found within the site.

The boundaries were found to have moderate levels of bat foraging and commuting activity and the Peace Path green corridor and another hedgerow towards the south were considered to be of

particular importance for bats. It is suggested that there are many opportunities to enhance the site for bats.

Appendix 8.4: Reptile Survey Report

A large population of slow worm and low populations of grass snake and common lizard are present. Mitigation and enhancement measures can be designed into the scheme, this can be dealt with by condition.

Appendix 8.5: Biodiversity Net Gain Report

The biodiversity metric records the condition of habitats on site and those which would be created following restoration. Given the fact that the site used to be a minerals and waste site, permissions for that use required restoration. However, the restoration plans associated with the previous permissions give no indication of the habitat to be created on the majority of the area, although there is a presumption that the site will be returned to agricultural use. Details for restoration are given which show some small areas as having planting of woody vegetation. It is understood that these areas have been planted and accounted for in the baseline condition.

It is understood that the restoration condition of the site is what is to be considered as the base line, as such there are questions which need to be asked with regards to the intended quality of restored habitats. It is accepted that for the majority of the area there can be no expectation of habitats of particularly high quality being created, however, where areas of woody vegetation have been planted as part of the restoration, it would be expected that they would reach a good condition habitat condition.

Therefore, it will be appropriate to reconsider the condition and distinctiveness of baseline habitats in more detail as part of the reserve matters.

Particular areas for further explanation with regards to the baseline habitats relate to how woodland is assessed with regards to deer browsing and how the diversity of age structure is considered with regards the size of plants on the edge. Further consideration might also be necessary with regards to how the woodland belt along the northern edge of the site is identified. The submitted report and metric account for them as two lines of hedgerow and an area of scrub where as it is more likely that it should be identified as a strip of woodland as it is between approximately 15 and over 30 metres wide and this is much wider than a hedge would normally be.

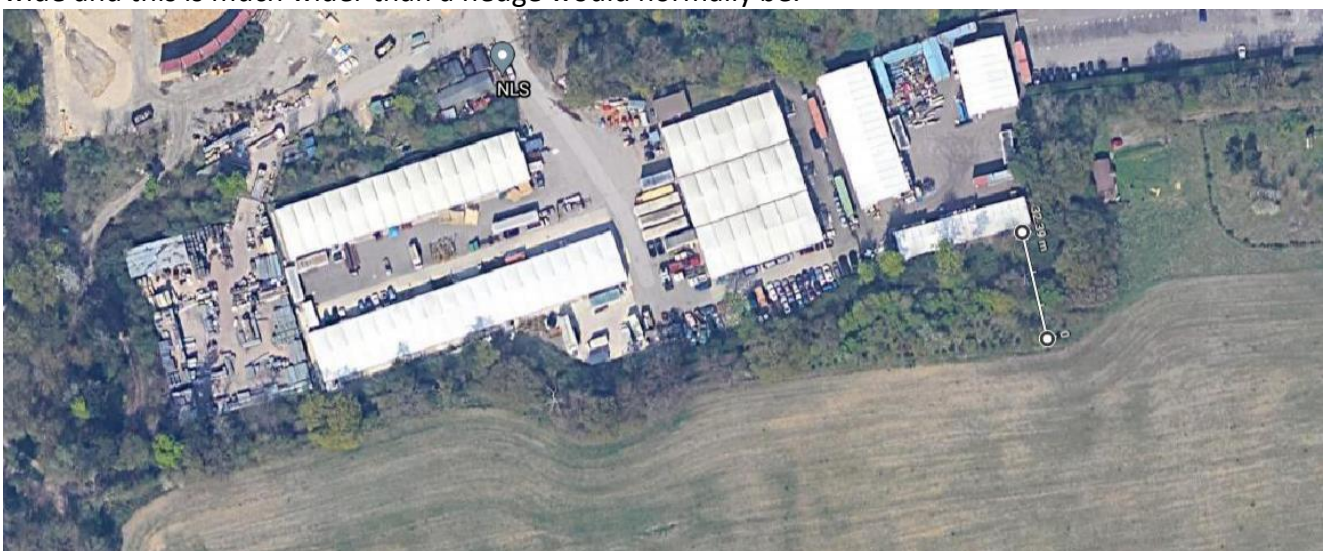


Figure 1. Aerial photo of woodland belt along the peace path.

It is highly likely that this would score quite differently as the aerial photos show that there are areas of young trees and also old trees with deadwood.

The low valuation of the baseline habitats means that it is relatively easy to secure an onsite biodiversity net gain. However a re-evaluation of the baseline may reduce the anticipated net gain. If

this were to be the case then there is plenty of opportunity to increase the biodiversity value of the site, e.g. incorporation of green roofs.

The Amended PP4 – Green infrastructure plan (drawing reference: 3770-FB-SK-05-140920 Rev P3) shows areas which will be Green infrastructure. The area within the large red circle is the same area as shown on the aerial photo above. The existing peace path green link which is lined with trees needs to be retained and then an additional buffer of at least 20m width needs to be added to it on the south side to ensure that there is a substantial and effective corridor. It is understood from conversations in a meeting on 18/11/2021 that it is anticipated that this green corridor will be 50m wide.

(Note that north on the plan below (figure 2) is to the right where as north on the aerial photo (figure 1) is upwards.)

The smaller red circle shows an area where there is no proposed Green Infrastructure, however there should be additional planting in this area to maximise connectivity for commuting bats.

The Green Infrastructure link needs to extend from the peace path to the north east corner. The suggestion that on the plan that the dark corridor would only be limited to one east west connection and that here it would not extend the full width of the site is unacceptable. This would result in a broken connection for Bechstein's bats. Therefore conditions will be required to clarify the situation and secure the necessary commuting corridor for bats.

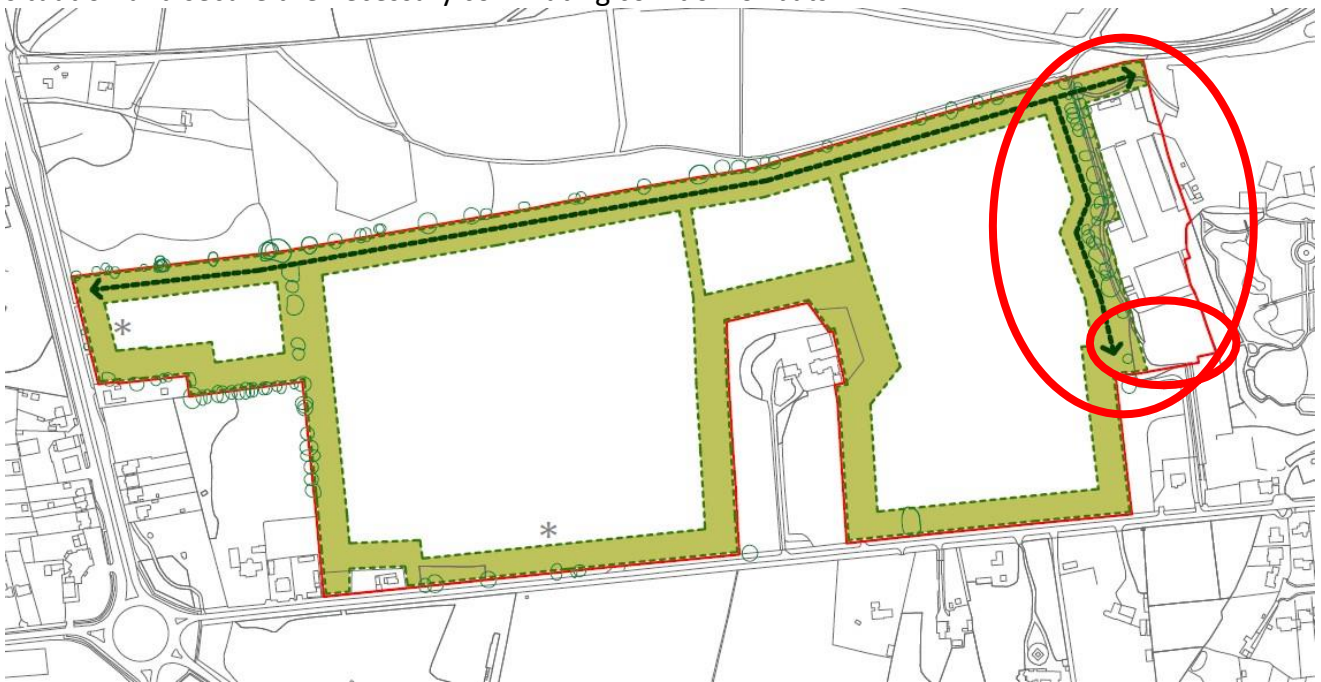


Figure 2. Image of PP4 – Green infrastructure plan (drawing reference: 3770-FB-SK-05-140920 Rev P3).

Recommendations

Overall it seems clear that the scale of the proposed development on this site is possible whilst also avoiding, mitigating and compensating for impacts on protected, priority and notable species and habitats.

However, there are some unresolved issues which have still not been dealt with completely, or need further work prior to the detailed design being produced for the site. These can be secured through reserve matters and conditions.

Conditions will need to be produced which will need to be signed off sequentially to ensure that design, then construction and ultimately maintenance and monitoring is correctly dealt with. A section 106 agreement will also be needed to address impacts beyond the boundaries of the site and beyond the timescale for which conditions last.

Issues which will need to be addressed through conditions:

Updated biodiversity impact assessments need to be undertaken which will start with the baseline being evidenced with the aid of photographs or existing areas which are not part of restoration plans and reasoned justification for the distinctiveness and condition assigned to restored areas. It is expected that there will be some amendments to more accurately account for the habitats which are existing and which would reasonably be expected to have been created as a result of the restoration plan. Issues to be addressed include:

- Recording the habitat along the peace path (I suggest that this is woodland rather than lines of hedgerow with adjacent scrub).
- Revisiting the assessment of habitat condition of existing habitats with evidence.
- A reassessment of the future restored habitats and their intended condition, this is most likely to require amendments in relation to woody vegetation planting.

Once the baseline has been reassessed and appropriately adjusted, the detailed design can commence, this must be carried out in conjunction with the iterative production of an updated metric and it must achieve the following:

- A biodiversity net gain of a minimum of 10%,
- Ground level green infrastructure areas of at least 9.5ha (this does not include incidental areas of green space/landscaping within the developed area).
- Expanded (to at least 40 metres width) and new green corridors which enhance the functional connectivity for bats (especially Bechstein's) between roosting locations in black park and foraging areas to the east. This must include a buffer the whole way around the property located in the north east corner of the sites.
- Buffers around and green infrastructure areas which are a minimum width of that shown on the Framework Bat Mitigation Strategy Plan.
- Consideration of the inclusion of Green Roofs on buildings which are designed to provide compensatory roosting sites for sky larks and lapwing as well as contributing to biodiversity net gain and providing additional biodiversity enhancements.
- Ecological enhancement measures in the form of food and water sources and the creation of homes for reptiles, nesting birds, barn owl and small mammals.

Detailed habitat creation/planting plans and specifications must be produced for all areas which will be valued as part of the biodiversity metric and for those other features of ecological value which are not featured in the metric.

The layout of the site must ensure that functions which require lighting (whether it be for use, safety, security or other reasons) are situated away from the boundary with black park and the connecting green corridors between black park and the west of the site. This is likely to mean that the backlot cannot be located where suggested on the Framework Bat Mitigation Strategy Plan.

The proposed road through peace path green corridor must be single carriage way, (one way at a time) and must be positioned to have minimal ecological impact and must not be lit where it passes through the green corridor.

Overall it seems clear that the scale of the proposed development on this site is possible whilst also avoiding, mitigating and compensating for impacts on protected, priority and notable species and habitats.

However, there are some unresolved issues which have still not been dealt with properly, or need further work prior to the detailed design being produced for the site.

Conditions will need to be produced which will need to be signed off sequentially to ensure that design, then construction and ultimately maintenance and monitoring is correctly dealt with. A section 106 agreement will also be needed to address impacts beyond the boundaries of the site and beyond the timescale for which conditions last.

Issues which will need to be addressed through conditions:

Updated biodiversity impact assessments need to be undertaken which will start with the baseline being evidenced with the aid of photographs or existing areas which are not part of restoration plans and reasoned justification for the distinctiveness and condition assigned to restored areas. It is expected that there will be some amendments to more accurately account for the habitats which are existing and which would reasonably be expected to have been created as a result of the restoration plan. Issues to be addressed include:

- Recording the habitat along the peace path (I suggest that this is woodland rather than lines of hedgerow with adjacent scrub).
- Revisiting the assessment of habitat condition of existing habitats with evidence.
- A reassessment of the future restored habitats and their intended condition, this is most likely to require amendments in relation to woody vegetation planting.

Once the baseline has been reassessed and appropriately adjusted, the detailed design can commence, this must be carried out in conjunction with the iterative production of an updated metric and it must achieve the following:

- A biodiversity net gain of a minimum of 10%,
- Ground level green infrastructure areas of at least 9.5ha (this does not include incidental areas of green space/landscaping within the developed area).
- Expanded (to at least 40 metres width) and new green corridors which enhance the functional connectivity for bats (especially Bechstein's) between roosting locations in black park and foraging areas to the east. This must include a buffer the whole way around the property located in the north east corner of the sites.
- Buffers around and green infrastructure areas which are a minimum width of that shown on the Framework Bat Mitigation Strategy Plan.
- Consideration of the inclusion of Green Roofs on buildings which are designed to provide compensatory roosting sites for sky larks and lapwing as well as contributing to biodiversity net gain and providing additional biodiversity enhancements.
- Ecological enhancement measures in the form of food and water sources and the creation of homes for reptiles, nesting birds, barn owl and small mammals.

Detailed habitat creation/planting plans and specifications must be produced for all areas which will be valued as part of the biodiversity metric and for those other features of ecological value which are not featured in the metric.

The layout of the site must ensure that functions which require lighting (whether it be for use, safety, security or other reasons) are situated away from the boundary with black park and the connecting green corridors between black park and the west of the site. This is likely to mean that the backlot cannot be located where suggested on the Framework Bat Mitigation Strategy Plan.

The proposed road through peace path green corridor must be single carriage way, (one way at a time) and must be positioned to have minimal ecological impact and must not be lit where it passes through the green corridor.

Lighting proposal designs must be drawn up in conjunction with an ecologist who is experienced in mitigating against impacts on bats (including Bechstein's), and they must demonstrate that there will be no foreseeable negative impacts on the way in which bats forage within and commute through the site.

Prior to commencement an audit of lighting on the existing pinewood site which could spill on to black park or the peace path green corridor must be undertaken. This must lead to implementable recommendations which will minimise lighting to a level where adverse impacts upon bats are unlikely. These recommendations must thereafter be actioned.

A Construction Environmental Management Plan (Biodiversity) (CEMP) must be submitted and approved in writing prior to commencement and subsequently followed.

A Habitat/Landscape and Ecological Management Plan needs to be produced which secures management (and associated funding) of onsite habitats for at least 30 years, this will also include ongoing monitoring and reporting. This will also show how areas which will be managed exclusively for wildlife (e.g. the peach path green corridor) will exclude access for all except those who are managing and monitoring it.

A detailed reptile mitigation strategy.

An updated badger survey immediately prior to commencement (as badgers frequently open new setts), with mitigation strategy and licensing requirements is necessary.

Updated roost inspections will be required prior to construction to inform any additional mitigation and determine whether Natural England licensing is required and if so, what measures would be required as part of the licence and associated mitigation plan

An agreed funding package must be secured to mitigate against negative recreational impacts upon the designated sites in Black Park.

A separate funding package must be secured to enhance conditions for Bechstein's bats within Black park and to fund their ongoing monitoring.

Funding must also be secured to compensated for the loss of ground nesting bird habitat and also for the loss of barn owl foraging habitat.

Conditions

Updated baseline

Prior to submission of any detailed design documents, an updated baseline biodiversity assessment of the site shall be submitted to and approved in writing by the Local Planning Authority. The details must use the latest Defra metric and clearly evidence with photographs and reasoned justifications, the condition and distinctiveness of existing and 'restored' habitats. The details must clearly show numbered areas on a plan which can be simply cross referenced with the metric and other important details. The agreed baseline valuation shall be the basis for biodiversity accounting of the detailed design.

Reason: to ensure that the biodiversity net gain calculations are based upon an agreed baseline value.

Minimum requirements

Prior to commencement of any works on site, details must be submitted to and approved in writing by the Local Planning Authority which show:

- a continuous vegetated dark corridor of a width of no less than 50 metres which extends along the peace path from Black Park and reaches Pinewood road in the north east corner of the redline area. The detailed design and management of this corridor must be produced in coordination with an expert in Bechstein's bats.

- Ground level green infrastructure areas of at least 9.5ha (this does not include incidental areas of green space/landscaping within the developed area) which as a minimum accord with plan PP4 – Green infrastructure plan (drawing reference: 3770-FB-SK-05-140920 Rev P3).
- A biodiversity net gain of a minimum of 10% as demonstrated through submission of a completed (latest version of the) Defra metric with supporting plans.

The development shall thereafter be progressed in accordance with the submitted details.

Reason: to ensure that the primary commuting route for Bechstein's bats between Black Park and foraging areas to the east of Pinewood road are protected and enhanced. And to ensure that minimum requirements for green infrastructure area and biodiversity net gain are achieved.

Updated surveys

Prior to the submission of an EDS and CEMP, updated surveys for relevant protected species shall be undertaken during the appropriate surveys season to inform any need for protected species licencing and to ensure that appropriate design of avoidance, mitigation, compensation and enhancement measures.

Reason: to ensure that detailed proposals are based upon up to date information about species which are a material consideration in the planning process.

Ecological design strategies

No development shall take place until an ecological design strategy (EDS) addressing mitigation, compensation, and enhancement has been submitted to and approved in writing by the local planning authority.

The EDS shall include the following:

Purpose and conservation objectives for the proposed works.

Review of site potential and constraints.

Detailed designs and/or working methods to achieve stated objectives.

Extent and location/area of proposed works on appropriate scale maps and plans.

Specification and source of materials (plants and otherwise) to be used where appropriate, e.g. native species of local provenance.

Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.

Persons responsible for implementing the works.

Details of initial aftercare prior.

Details for monitoring and remedial measures for habitat creation and enhancement.

Details for disposal of any wastes arising from works.

Provision for wildlife corridors, linear features and habitat connectivity.

Woodland, tree, hedgerow, shrub, wetland and wildflower planting and establishment.

Proposed new landforms associated with habitat creation, e.g. water bodies and watercourses.

Soil handling, movement and management.

Creation, restoration and enhancement of semi-natural habitats.

Species rescue and translocation, reptiles.

Bat crossings for new roads.

Creation of new wildlife features, including but not limited to bird nesting and bat roosting features within buildings and structures, and attached to trees, reptile hibernacula and wildlife ponds.

Provision and control of access and environmental interpretation facilities, e.g. bird hides, paths, fences, bridges, stiles, gates and signs/information boards.

The EDS shall where appropriate be cross reference in other relevant details (e.g. landscape plans, detailed building design, construction environmental management plan), and it shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: to ensure that green infrastructure areas are designed to maximise ecological benefit.

Construction Environmental Management Plans (Biodiversity)

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

Risk assessment of potentially damaging construction activities.

Identification of “biodiversity protection zones”.

Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.

The location and timing of sensitive works to avoid harm to biodiversity features.

The times during construction when specialist ecologists need to be present on site to oversee works.

Responsible persons and lines of communication.

The role and responsibilities on site of an ecological clerk of works (ECow) or similarly competent person.

Use of protective fences, exclusion barriers and warning signs.

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

Reason: To ensure that development is undertaken in a manner which ensures important wildlife is not adversely impacted.

Landscape and ecological management plans (LEMPs)

A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the LEMP shall include the following.

Description and evaluation of features to be managed.

Ecological trends and constraints on site that might influence management.

Aims and objectives of management.

Appropriate management options for achieving aims and objectives.

Prescriptions for management actions.

Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).

Suggested ongoing areas of management which will require further consideration in the period from 5 to 30 years after establishment.

Details of the body or organisation responsible for implementation of the plan.

Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term (for at least 30 years) implementation of the plan will be secured by the developer with the management body responsible for its delivery.

The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The approved plan will be implemented in accordance with the approved details.

Reason: To ensure appropriate and reliable aftercare is delivered which will achieve biodiversity objectives.

Lighting design strategy for light-sensitive biodiversity

Prior to occupation, a “lighting design strategy for biodiversity” for with specific focus on the requirements of Bechstein’s bats shall be submitted to and approved in writing by the local planning authority. The strategy shall be designed in accordance with recommendations from the AEWC Advanced Bat Survey Report and the Institute of lighting professionals document ‘Bats and artificial lighting in the UK Guidance Note 08/18’

- a) identify those areas/features on site that are particularly sensitive for Bechstein’s bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) and detail how timing of lighting will be controlled, so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.
- c) ensure that lighting shall have a colour temperature of less than 3000 Kelvin.

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

Reason:

Bechstein’s bats are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed and/or discouraged from using their breeding and resting places, established movement corridors or foraging areas. Such disturbance can constitute an offence under relevant wildlife legislation. Limiting negative impacts of light pollution is also in line with paragraph 185 of the NPPF.

Lighting reduction on the wider site

Prior to commencement, a detailed lighting assessment which analysed how lighting from the existing Pinewood development could impact upon Bechstein’s bats, and makes practical recommendations to minimise impacts, shall be submitted to and approved in writing by the local planning authority. Pinewood studios must commit to implementing the recommendations by 1/1/2027 and must submit a report prior to that date to show the actions taken.

Reason: to ensure that any harmful lighting to bats on the wider pinewood studios site is appropriately reduced to prevent negative impacts upon Bechstein’s bats.

Bechstein’s monitoring

Prior to commencement an annual monitoring plan, which has been produced by an expert in Bechstein’s bats, shall be submitted to and approved in writing by the Local Planning Authority. The Monitoring plan must set out clear objectives, methods, reporting or results and funding requirements (to be fulfilled by Pinewood Studios), which must include the monitoring of Bechstein’s bats in Black Park and how they use the areas adjacent to Pinewood studios.

Reason: to ensure that negative impacts upon Bechstein’s bats are avoided through the avoidance, mitigation and enhancement measures relating to the scheme.

Country Parks, Communities Directorate

10.11.20

Public Access

The existing Pinewood Link Path is an important link between Iver Heath and Black Park. The route has a nice feel to it with views out across the former quarry site and there are some notable trees that again add to the aesthetic quality of the route. It is well used and well established and it has been noticeable throughout the Covid-19 pandemic that usage levels have been significantly higher. It connects into the parks primary path network and this access point has been identified in the country parks spatial plan as a key access point and a location where the parks would want to further improve information and orientation for visitors.

The loss of this path will in our opinion have a significant impact on residents of Pinewood Green and more widely Iver Heath. They will lose a very direct route into Black Park that links in well with the existing network of footpaths and roadside pavements. The ability to easily walk to the park significantly increases the likelihood that people will walk and contributes, to the health and wellbeing of the local community and also reduces car use.

The indicative new route presents several issues, firstly due to its locations, connectivity with Pinewood Green and Iver Heath is not as good as the existing route although improvements to an adjacent Public footpath could help mitigate this. This is also a cross country route through a very narrow alleyway with no lighting or nearby residential occupation which may appear unsafe to some sectors of the community compared to the existing route through Pinewood Green. On reaching the county park the proposed new path will not link in to the parks primary path network in the same way that the existing link path does. (fig 1) The paths on the eastern side of Black Park are secondary routes and this is reflected in the type and quality of the surfacing of the paths. (fig 2)

To bring a new access route in at another point in Black Park will require the developer to carry out works to improve the internal path network in the park, both in terms of surface quality and also connectivity with the main path network. The developer will also need to provide information and orientation for visitors accessing the park from the proposed new route as it is a very different arrival point for the existing route.

Any proposal for a new route should be an improvement on what is already offered and the quality of the route and experience of walking it should be a key part of its design. Users must not feel hemmed in and the route needs to feel safe and open. Access improvements for cyclists and pushchairs and mobility buggies should be factored in especially when looking at the width of the path surface.

The proposed relocation of the Pinewood Link Path will increase visitor numbers in areas of the park that are quieter and also potentially change the ways in which trees need to be managed for public safety. Ecological survey work in the area where the path will be relocated to should be conducted as should tree condition surveys and a plan for any remedial works, where use levels will be increased in areas of Black Park by this development.

Boundary, Fencing and Screening

The views out over the restored open ground from Black Park's eastern boundary adds significantly to the feel and quality of this part of the park. In the spring the path is lined with Bluebells and is enjoyed and appreciated by many visitors every year. The proposed development will significantly impact on this and even with a 30 metre buffer strip, the sense of space will be lost and the visual quality degraded. We are particularly concerned about the area nearest to Taylors Gate where the

perimeter path inside Black Park is directly adjacent to the fence. We would want a 30 metre plus 20 metre approach applied, where a buffer of 50 metres is achieved from the perimeter paths edge, up to 20 metres of this can be found within Black Park with a minimum of 30 metres on the proposed development side, but where there is less than 20 metres buffer available in Black Park this will need to be made up on the proposed development site to a maximum of 50 metres.

This will at least preserve some sense of openness and prevent the claustrophobic and unappealing feel of the perimeter path adjacent to the Pinewood Studios (fig 3) existing facilities.

Any security type fencing (fig 4) must not be adjacent to the parks boundary and should be at least 50 metres away from the adjacent path. Agricultural type fencing that is currently in use should be used to define the boundary between the park and development site. (Fig 5)

The use of soil bunds in landscaping also needs to be carefully considered as the current approach by Pinewood is both highly damaging to trees and incredibly ugly! (fig 6) Any soils that are imported on to the development site must be of a neutral or acidic pH value complementing the existing soils of the Country Park to encourage appropriate plant colonies. We appreciate there will be a need to fence and screening off the proposed development but its relationship with Black Park must be as much of a consideration as its function for the developer. Any bunds should be a minimum of 50 metres away from the Black Park boundary path.

Location of the proposed Backlot Area

We are very concerned about the proximity of the proposed backlot area to the Black Park boundary. The park already has two backlot areas immediately adjacent to it from the existing studio complex; these are often very messy and aesthetically (fig 7) look unpleasant when viewed from the park. They are also prone to produce litter that blows into the park through the fence and have been the source of several pollution incidents that have found their way into park watercourses, backlots can also create additional noise and light pollution.

Any proposed development should locate backlots away from the Black Park boundary for these reasons and to try to ensure that the view from the park towards the propose development is as aesthetically pleasing as possible.

Trees, Environment and Ecology

Black Park's eastern boundary is well established with some significant landscape and hedgerow trees. It is also an area where Bluebells can be found and rapidly spreading.

Recent thinning of adjacent woodland compartments has led to increases in diversity in the understorey and there are anecdotal records of more diverse wildlife in this area. It is worth noting that prior to this development proposal the adjacent quarry area was to be restored to agricultural land, this would have meant that disturbance to this area from adjacent activity would have been minimal. The development proposal will generate at least another three years of disturbance through the construction phase and then a permanent higher level of disturbance than would have been experienced if it had been retained as agricultural land. This must be considered and mitigated for in the development proposal.

Trees adjacent to the development site must have significant protection measure put in place, both through the development and against future operation of the site. Currently operating practices in Pinewood Studios is a concern with very little consideration given to root protection or other practices such as storing equipment under veteran trees. (fig 8)The development should not compromise management practices that benefit wildlife such as retaining deadwood in the crowns of trees.

Approx. 100 metres from the North West corner of the proposed development site a colony of Bechstein Bats has been found, further details of this will be provided, but this must be fully

considered and protected as part of this development. This is a recent and exciting discovery and aspiration for this development should be to protect and further understand its extent and opportunities the development may present to protect and enhance habitat for this rare species. Details of this colony have been provided in a separate submission by Daniel Whitby and directly to the developers ecology team..

Too the South Eastern corner of the proposed development is a thin strip of woodland within Black Park between Billet Field and the development site. This is one of the most undisturbed areas of the park and a real refuge area for wildlife. Badger activity has recently been picked up on camera traps Billet Woods Badger and a Bechstein Bat has been trapped close to this area. Further ecological investigation of this area is needed as it has high wildlife potential and this development will negatively impact on this.

If the proposed development goes ahead through increased disturbance of the area it will be of lesser value to wildlife, we would be looking for onsite mitigation to enhance other wildlife refuge areas within Black Park.

It should also be taken into consideration the proximity of the Black Park Lowland Heath SSSI, which has been identified by Natural England as the best example in the County. This development will have direct and indirect impacts on this sensitive site and its wildlife and we would expect a package of mitigation to be put in place to help offset these.

Commercial Relationship with Black Park

Pinewood Studios and Black Park have always had a close and good working relationship, Black Park benefits commercially from the proximity of Pinewood Studios and likewise Pinewood Studios offer to film productions is enhanced by Black Park. Opportunities exist with this development to build on this and also bring wider benefits to the UK film industry and park users.

The access route into Black Park from the studios through Taylors Gate should be improved so that film productions can move vehicles and equipment easily between the park and the studios. This will reduce the number of vehicle movements associated with filming on local roads and also reduce distances that vehicles have to travel internally in Black Park. We would also like the development to provide an access route into Black Park from the proposed junction with the A412, this would provide a much safer access route in to the park for commercial and filming access and also remove the need for a difficult turn in and turn out onto the A412 from our existing commercial entrances.

With the proposed development increasing vehicle use on the A412 this will also help with road safety issues and also allow Black Park to move vehicle activity away from busier visitor areas within the park.

Wider Impacts on Black Park as a visitor destination

Black Park is a regional visitor destination attracting in excess of 750,000 visitors a year; it facilitates the employment of approx. 125 people, predominantly from the local area and contributes over £1 million to the local economy annually. Langley Park which is adjacent to Black Park also attracts over 250.000 visitors a year and is a significant attraction in its own right too. It is very important that this is recognised and it is understood that the local road network is already serving to very well used and busy visitor destination. Visitor numbers to the Country Parks are also growing and look set to grow for a number of years.

The proposed development will add considerable pressure to the local road network and importantly peak times for visitors to the film themed experience will be the same peak times as visitors to Black

Park and Langley Park. The A412 is of particular concern as it is a fast and dangerous road, with accidents occurring regularly at the Black Park road junction.

There is also considerable use of the laybys adjacent to Black Park and Langley Park as parking areas by people not wanting to use the main car parks. The concern here is there are regularly cars slowing suddenly trying to find spaces, cars stopping and reverse parking against the traffic, parking on acceleration lanes and slip roads, parking on verges and pedestrian footways.

Increased volumes of traffic on this road due to the construction of and operation of the proposed development will increase the risk to all road users on the A412 and also create additional noise, disturbance and air quality issues for both Black Park and Langley Park. We would want road safety improvements on the A412 to be part of this development and a key consideration of the planning process. Issues with lay-bys and slip-road need addressing and with another junction being created on the A412 we would want the speed limit reduced to 40mph.

Impact on the visitor experience in Black Park

Black Park is not just a destination for recreation, it is very important to visitors from a health and wellbeing perspective too. Use of the park can improve visitor's mental wellbeing, physical health and contribute to other Govt. objectives such as tackling childhood obesity. The proposed development has the potential to devalue some of these benefits in several ways.

- Increased noise and light pollution through construction, the operation of the attraction and also filming activity adjacent to the park boundary.
- Degrading the visual quality of the eastern boundary of the park, research strongly indicates that the quality of a natural environment is linked to its value from a mental wellbeing perspective. The quality of the eastern area of Black Park will be degraded in this context and be of less value to visitors.
- The eastern boundary may become a less desirable area for visitors to walk and lead to additional pressures on other areas of the park; these in turn become more crowded and lose some of the benefit that they create.
- Many visitors strongly value opportunities to engage with nature, these opportunities may be impacted on in areas adjacent to the proposed development or visitors will be less likely to visit and use this area of the park due to its proximity to the proposed development.

Appendix 1 Images.

Fig 1. Existing path infrastructure in Black Park as you enter from the Pinewood Link Path. Fig 2. Path type and condition adjacent to the proposed replacement link path route.

Appendix 1 Images.

Fig 3. Fence and bund and set construction adjacent to the eastern boundary path.

Fig 4. Detail of visually unappealing security fence adjacent to the Black Park boundary. Appendix 1 Images.

Fig 5 Low visual impact agricultural style fencing is in keeping with Black Park.

Fig 6. Messy/unattractive bund with soil piled around the base of a declining mature tree. Appendix 1 Images.

Fig 7 Dumping and litter adjacent to the Black Park boundary in the Backlot area. Appendix 1 Images.

Fig 7. Trailers parked under a veteran tree.

Report



TEMPLE

LEADERS IN ENVIRONMENT,
PLANNING & SUSTAINABILITY.

Report for – Buckinghamshire Council
Screen Industries Global Growth Hub Partial ES, Compliance and Standalone
Document Review
Final Review Report 002



Document version control

Version	Date	Author	Reviewed by	Reviewed and approved by
1.0	25/02/2021	Various	Jessica Parnwell	James Sanders
1.1	26/02/2021	Various	Jessica Parnwell	Jessica Parnwell

Report for: **Buckinghamshire Council**

Main contributors: **Various**

This report has been prepared by Temple Group Ltd with all reasonable care and diligence within the terms of the contract with the client. We disclaim any responsibility to the client and others in respect of any matters outside the scope of the contract. We accept no responsibility to third parties to whom this report, or any part, thereof is made available. Any such party relies upon the report at their own risk.

Contents

1.0	Introduction to the Review	1
2.0	Review of Submitted Clarification and Potential Regulation 25 Requests	2
3.0	Summary of Mitigation Measures	8

Appendices

Appendix A	– Interim Review Report	12
Appendix B	- Final Review Report 001	13

1.0 Introduction to the Review

- 1.1.1 The Temple Team carried out an independent review of Chapters 7, 10 and 11 of the Environmental Statement (ES) submitted in support of the planning application for Screen Industries Global Growth Hub (Application Reference: PL/20/3280/OA). The output of the review was an Interim Review Report (IRR) (**Appendix A**) submitted to Pinewood Group Limited (PGL), 'the Applicant' by Buckinghamshire Council.
- 1.1.2 In response to the IRR Turley, on behalf of the Applicant, submitted the 'Response to Temple Comment' document dated 11th December 2020. This was reviewed in January 2021; the Final Review Report 001 (**Appendix B**) contained the review of this response.
- 1.1.3 The Applicant submitted a further response to those clarification and potential Regulation 25 requests considered outstanding in the FRR001, in the 'Screen Industries FRR Response' document dated February 2021. A review of the specific responses to the individual IRR clarification and potential Regulation 25 requests is presented within **Chapter 2** of this FRR 002.

2.0 Review of Submitted Clarification and Potential Regulation 25 Requests

- 2.1.1 The Applicant has responded to the remaining clarifications and potential Regulation 25 requests in the 'Screen Industries FRR Response' document dated February 2021.
- 2.1.2 **Table 2.1** below provides a review of the remaining requests for clarifications and potential 'further information' (under Regulation 25) in the January 2021 FRR.
- 2.1.3 Each clarification and potential 'further information' (under Regulation 25) request has been dealt with individually in **Table 2.1** and the Temple Team have stated whether the Applicant's response is deemed to be acceptable to close out the issue, or whether further clarification or information is required. If there are outstanding issues following the reassessment, a further round of review may be required.

Table 2.1 Assessment of Response to FRR within the ‘Screen Industries FRR Response’ document, February 2021

Chapter IRR Ref No.	Request Type	Comment / Request IRR	Comment / Request FRR	Review Commentary	Review Conclusion Responses considered to be Acceptable (Green) or Unacceptable (Red)
Chapter 7: Landscape and Visual Ref: 4	Clarification	Amendments to photomontages to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	The green infrastructure parameter plan (Figure 4.6) identifies the location of a peripheral belt of multi-functional green infrastructure (GI), including new/enhanced landscape and ecology and a strengthened landscape frontage to Pinewood Road. It does not specify the quantum or extent of tree/shrub planting within this GI corridor and does not commit to provision of the woodland belts that have been modelled. The assessment should not rely on the establishment of woodland belts, which may or may not be found to be feasible at reserved matters stage. It is accepted that the photomontages cannot accurately identify the potential access locations but a note in the photomontage footer to flag up the requirement for these access points would have helped avoid any misunderstanding by the general public that the hedgerow would be left intact.	The Applicant has offered a commitment to provide a 10-15 m depth of planting. This should be identified on the PP4: Green Infrastructure parameter plan to reflect the findings of the LVIA.	Acceptable This is considered acceptable on the basis that the Applicant's commitment is secured through an appropriately worded planning condition. This has been included to Table 3.1. below.
Chapter 7: Landscape and Visual	Clarification	Revisions to the landscape and visual impact assessment to (1) accurately reflect the	As noted in the Ref: 4 response above, the green infrastructure parameter (Figure 4.6) does not commit to the provision of	As noted in the Ref: 4 response above, provision of a 10-15 m depth of planting within the 30 m buffer to Black Park should be	Acceptable This is considered acceptable on the

Ref: 5		relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	woodland belts and hence there is no basis to assume a continuous 10-13m high woodland buffer in the Year 15 assessment. As per the response to IRR Ref 4, it would be useful if the Applicant could identify during the which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned. It is accepted that the Chapter 7 LVIA judgements include the assumption that accesses will be required. The reviewer is satisfied that the large magnitude of change identified for views from Pinewood Road at Year0 would 'accommodate' the 20m length of hedgerow loss associated with each of the proposed junctions off Pinewood Road.	identified on the PP4: Green Infrastructure parameter plan. The LVIA and photomontages are also based on provision of woodland belts along Pinewood Road.	basis that the Applicant 's commitment is secured through an appropriately worded planning condition. This is included in Table 3.1 below.
Chapter 7: Landscape and Visual Ref: 8	Potential Regulation 25	Provide justification as to the level of the effect in Year 15 with specific reference to the effectiveness of the woodland buffer in winter.	The Applicant has stated that the LVIA judgements take into account the fact that views of buildings will not be completely screened from the section of bridleway closest to the Site. The illustrative masterplan (DAS Figure 6.10) indicates a line of intermittent trees/parcels along the centre of this GI corridor/parallel to the western siteboundary. This small number of trees will provide some intermittentfiltering of views during the winter months at Year 15.	The Applicant has offered a commitment to provide a 10-15 m depth of woodland planting. This should be identified on the PP4: Green Infrastructure parameter plan to reflect the findings of the LVIA.	Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action required.
Chapter 7: Landscape and Visual Ref: 9	Potential Regulation 25	The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of	The Applicant has stated that the reduction in effects is largely a consequence of the maturing vegetation; however, as previously	As noted in the Ref: 4 response above, provision of a 10-15 m depth of planting within the 30 m buffer to Black Park should be identified on the PP4: Green	Acceptable This is considered acceptable on the basis that the

		significant effect falls from Year 0 to Year 15 should also be provided.	stated, it is not clear whether woodland planting is proposed.	Infrastructure parameter plan. The LVIA and photomontages are also based on provision of woodland belts along Pinewood Road.	Applicant's commitment is secured through an appropriately worded planning condition. This has been included to Table 3.1. below.
Chapter 10: Climate Change Ref: 16	Potential Regulation 25	Provide an estimate of GHG emissions associated with the transportation of c. 2 million visitors and associated servicing of the scheme, and update overall residual effects accordingly.	<p>Excluding operational activities such as mains water consumption, wastewater treatment, and the transport and treatment of waste is considered acceptable, as stated in the initial review.</p> <p>With regards to the emissions associated with transport, the Applicant states that this <i>"cannot be carried out accurately as there is no way of determining which of the potential c.2 million trips are new, i.e., they are additional to those already on the network"</i>, and points to Paragraph 10.90 of the chapter relating to increased use of electric vehicles and other low carbon initiatives for freight transport.</p> <p>Whilst the IEMA GHG assessment guidance acknowledges that qualitative assessments are acceptable where data is unavailable, it is considered that reasonable assumptions could be readily applied to give a reasonable worst-case assessment. The nature of the Proposed Scheme is such, that it is likely that trips are made specifically to visit it and a sensible trip origin and vehicle type</p>	<p>The Applicant has provided a detailed and reasoned response to this further request for information.</p> <p>Their response now includes a clear description of transport related mitigation embedded into the scheme and an explanation of the future baseline trends in decarbonising vehicular traffic, which weren't included in detail in the original ES chapter the review was based on.</p> <p>The Applicant's argument regarding how the IEMA guidance allows for qualitative assessment is accepted and clearly recognised. It is also understood that the Applicant has chosen to select a notional quantitative threshold against carbon budgets as a basis for assessing significance, and therein lies an inconsistency and reason for the Reviewer seeking some degree of quantification. If the significance thresholds are largely based upon a quantified proportion of a carbon budget and many of the construction and operational emissions have been</p>	<p>Acceptable</p> <p>This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action required.</p>

			<p>could be applied in the absence of anything more detailed from the Transport Assessment (which would be surprising if this is not available).</p> <p>Not being able to accurately estimate emissions is not the same as not including a very broad assessment with clearly stated assumptions. Therefore, it is considered that, notwithstanding the above points, a critical source of GHG emissions has been excluded from the magnitude set out in Tables 10.13-10.15 and the assessment is not acceptable.</p>	<p>quantified, then it follows that to then simply exclude a potentially large (if inherently uncertain) source of emissions from the assessment (e.g. in Table 10.16) without factoring in the qualitative aspect leads to questions over the approach.</p> <p>In essence, transport emissions may not be significant on their own, but combined with the other operational emissions they might be.</p> <p>That said, it is agreed that <i>“The mitigation measures [now clarified] would not change if an attempt were made to undertake a quantitative assessment.”</i></p> <p>Therefore, there is no further benefit to be gained by providing further quantification and this point is now agreed.</p>	
<p>Chapter 10: Climate Change</p> <p>Ref: 20</p>	Potential Regulation 25	Update the NTS to reflect the comments and include all significant effects and a description of climate change adaptation/resilience.	<p>The Applicant states that the NTS already concludes that effects would not be significant, taken from the assessment conclusion. In light of their responses, it is not considered the NTS required updating.</p> <p>The Reviewer is still concerned about the exclusion of a reasonable worst-case assessment of operational traffic, as set out in the review of Ref: 16. Inclusion of emissions from c. 2 million net additional annual trips from wherever they might arise is expected to lead to an increase in the overall emissions well above</p>	<p>Given the response provided by the Applicant and noting the Reviewer's response to Ref: 16, this is agreed.</p>	<p>Acceptable</p> <p>This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action required.</p>

			the 3% magnitude threshold identified in the assessment, and therefore trigger a significant effect which should be identified in the NTS.		
Chapter 11: Air Quality Ref: 28	Clarification	Figure A11.1 needs to be updated to show distance bands to Pleasant Cottage Guest House, Pinewood Manor & Goosebarry Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings.	<p>The Applicant has advised that distance bands were generated from the boundary of the Site which provides a worst-case assessment and therefore no updates are required.</p> <p>Drawing distance bands from the site boundary for construction dust assessments is acceptable however the distance bands in Figure A11.1 have not been drawn correctly around the southern end of the site and need to be updated.</p>	<p>The Applicant has used the distance bands (represented in the revised buffer maps) to correctly identify the potential for fugitive dust from earthworks, construction and trackout activities to impact amenity/human health within Appendix 11.4 of the ES Chapter uploaded to the planning portal on 1st Oct 2020. The mitigation measures have been selected in accordance with the IAQM guidance for a high-risk site and the previous planning recommendations that have been made are appropriate, assuming the Applicant commits to putting the measures in Appendix 11.4 into the CEMP or Dust Management Plan.</p>	<p>Acceptable</p> <p>No further clarification required.</p>

3.0 Summary of Mitigation Measures

- 3.1.1 The table below provides a summary of all mitigation measures proposed by the Applicant across the topics that the Temple Team have been commissioned to review, both embedded and additional.
- 3.1.2 The mitigation measures proposed have not been updated as a result of the Applicant's response document, though we propose additional recommended measures as a result of this review, these are highlighted in **bold**.
- 3.1.3 Buckinghamshire Council should ensure they secure the delivery of these mitigation measures by means of an appropriate approval, obligation, agreement and/or condition.

Table 3.1: Summary of Mitigation Measures

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
LVIA	Pre-Construction	None	None
	Construction	<p>Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS5837:2005 Trees in relation to construction).</p> <p>Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS5837:2005 Trees in relation to construction).</p> <p>Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009);</p> <p>Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.</p>	None

	Operation	<p>Keeping building heights lower in proximity to visual receptors (residential receptors);</p> <p>Retaining all high and medium value trees with appropriate root protection buffers where possible, as identified by the Arboricultural Impact Assessment (see Appendix 7.2);</p> <p>Where vegetation losses are unavoidable (e.g. at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;</p> <p>Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;</p> <p>Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points;</p> <p>Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;</p> <p>Within the green infrastructure buffer, and adjacent to Black Park where the PRow is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;</p> <p>Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/year);</p> <p>Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties.</p>	<p>Consideration of the opportunity at Reserved Matters stage for creation/enhancement of an east-west pedestrian/cyclelink (as highlighted in the Colne and Crane Green Infrastructure Strategy) east-west across the site, ideally linking with existing public footpaths along the eastern edge of Pinewood Road.</p> <p>Preparation of detailed landscape proposals at Reserved Matters stage to provide a robust framework of vegetation for landscape and visual integration purposes.</p> <p>Careful consideration at Reserved Matters stage of the colours and textures of building materials.</p> <p>Careful consideration at Reserved Matters stage of the treatments of signage, security fencing, lighting columns and other free-standing features along the site periphery.</p>
Climate Change	Pre-Construction	None	None
	Construction	Site Waste Management Plan and Construction Environmental Management Plan	None
	Operation	"Fabric first" approach with building envelope performance beyond the	None

		minimum backstop requirements of the Building Regulations Part L 2013; 100% low energy (LED) lighting; High efficiency gas boilers or low carbon heat pumps where heating is required; 10% of the site's energy delivered through low carbon renewable energy.	
Air Quality	Pre-Construction	None	None
	Construction	None	Dust mitigation to be included in a Construction Environmental Management Plan (CEMP).
	Operation	None	None

Additional Recommended Measures

Compliance Review

The Applicant should provide worst-case scenario parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.

Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.

Landscape and Visual Impact Assessment

A Landscape and Ecological Management Plan should be prepared at the Reserved Matters stage.

A commitment to provide a 10-15 m depth of planting should be secured through an appropriately worded planning condition and then this should be identified on the PP4: Green Infrastructure parameter plan.

Climate Change

Provide details of how mitigation measures can be further developed at later design stages, and monitored during construction and operation.

Air Quality

It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.

It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.

Sustainability Statement

A planning condition should be raised to ensure the development provides 10% of its energy requirements from renewable or low carbon sources.

A Materials and Waste Management Strategy is required to support the reserved matters application. It is recommended that the material use proposals within the whole life carbon assessment is considered as soon as possible to make the most meaningful impact.

A construction stage water management strategy is required to support the reserved matters application. A

Site Waste Management Plan is required to support the reserved matters application.

A Drainage Strategy is required to support the reserved matters application.

An Energy Strategy is required to support the reserved matters application.

An Overheating Report is recommended to support the reserved matters application.

Appendix A – Interim Review Report

Report for – Buckinghamshire Council
Screen Industries Global Growth Hub Partial ES, Compliance and Standalone Document
Review
Interim Review Report Final



Document Version Control

Version	Date	Author	Reviewed by	Reviewed and Approved by
1.0	17/11/2020	Various	Jessica Parnwell	Spencer McGawley

Report for: **Buckinghamshire Council**

Main Contributors: **Various**

This report has been prepared by Temple Group Ltd with all reasonable care and diligence within the terms of the contract with the client. We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above. We accept no responsibility to third parties to whom this report, or any part, thereof is made available. Any such party relies upon the report at their own risk.

1.0 INTRODUCTION TO THE REVIEW

1.1 Introduction

- 1.1.1 The Temple Team have been commissioned by Buckinghamshire Council to carry out an independent review of Chapters 7, 10 and 11 of the Environmental Statement (ES) submitted in support of the planning application for Screen Industries Global Growth Hub (Application Reference: PL/20/3280/OA). The review of these technical chapters is found in **Section 2** of this report.
- 1.1.2 In addition to the aforementioned technical chapter reviews, the Temple Team have also been commissioned to review regulatory compliance of the ES, and the Sustainability Statement and Landscape Strategy submitted in support of the planning application. The ES compliance review is found in **Section 3** and the review of the standalone documents is found in **Section 4** of this report.
- 1.1.3 Mitigation measures that the Applicant proposes and recommendations by the reviewer are included in **Section 5**.
- 1.1.4 This Initial Review Report (IRR) provides a review of the aforementioned documents prepared by Turley on behalf of Pinewood Group Limited (PGL), 'the Applicant'.

1.2 The Review Process

- 1.2.1 This report constitutes the IRR, which collates the findings of the review of the specific ES topic chapters and standalone reports commissioned by Buckinghamshire Council. For the chapter reviews, **Section 2** of the report provides a list of clarifications and potential Regulation 25 information requests required from the Applicant. Importantly, these are only potential Regulation 25s at this stage – this is to reflect the importance of these points, but also provides the Applicant with an opportunity to contest / respond.
- 1.2.2 For the review of the standalone reports, **Section 3** of the report provides a list of clarifications and action points requested from the Applicant.
- 1.2.3 Should the application proceed, the Applicant may respond to the IRR providing further information on the potential Regulation 25 requests, actions points and clarifications as necessary. These will then be considered by Buckinghamshire Council and Temple. A Regulation 25 request will be raised where it is considered that without the missing information the ES is deemed to be deficient in terms of the EIA Regulations and that inclusion of the information has the potential to alter the assessment of significant effects.
- 1.2.4 If it is deemed that information requested in the IRR remains outstanding the Applicant will be informed in writing. Without this information the ES is not considered to be complete. If the planning application were to be determined without this information, it could only be refused.
- 1.2.5 Mitigation measures are relied upon in the ES to limit or remove any significant adverse environmental effects. It is the Council's responsibility to ensure that any required mitigation is secured. To assist with this, the Temple Team have identified the mitigation measures relied upon in the chapters that Temple have reviewed in **Table 5.1** – this includes both mitigation that forms part of the scheme for approval, and that that needs to be secured e.g. via condition or planning obligation.

2.0 ES CHAPTER REVIEWS

2.1 CHAPTER 7: LANDSCAPE AND VISUAL

Policies, Guidance, Legislation and Standards

- 2.1.1 The LVIA chapter does not reference relevant landscape-related planning policies at either national or district level. It also does not reference landscape strategies identified in published landscape character assessments and green infrastructure studies.
- 2.1.2 Paragraph 7.6 notes that the assessment is based on the Guidelines for Landscape and Visual Impact Assessment¹ (GLVIA3). The chapter should also refer to:
- Photography and Photomontage in Landscape and Visual Impact Assessment - Landscape Institute Advice Note 01/11 (March 2011); and
 - Visual representation of development proposals, Landscape Institute Technical Guidance Note (TGN) 02/17 (March 2017).
- 2.1.3 As noted in paragraph 7.6, there is no legislation covering landscape and visual impact assessment.

Assessment Methodology and Significance Criteria

- 2.1.4 The various stages for undertaking a landscape and visual impact assessment, as set out in the study methodology (paragraph 7.20 to 7.33), are broadly in accordance with best practice guidance in GLVIA 3.
- 2.1.5 The criteria used to define magnitude of landscape and visual change are not particularly detailed but adequately cover what is required.

Baseline Conditions

- 2.1.6 Night-time conditions are not described in the landscape baseline section (paragraph 7.34 to 7.38).
- 2.1.7 The identification of the eastern site boundary hedgerow as being in poor condition (paragraph 7.37) is not a fair judgement based on the overall findings of the Tree Survey and Arboricultural Impact Assessment.
- 2.1.8 Reference is made in paragraph 7.38 to the Colne and Crane Green Infrastructure Strategy. The objectives of this strategy should be set out.
- 2.1.9 Reference is made in paragraph 7.43 to the Colne Valley Regional Park. The objectives of this regional park should be identified.
- 2.1.10 The descriptions of landscape character, as extracted from the most relevant published landscape character assessments, are limited to landscape and visual sensitivities. Identification of 'key characteristics' and a description of each LCA would have provided the reader with a better understanding of the landscape resource and its value. The

¹ Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA 3), by the Landscape Institute and Institute of Environmental Management and Assessment, (2013).

vision, strategy and landscape guidelines for the character areas in the published landscape character assessments (Iver Heath Mixed Use Terrace LCA and Iver Heath Terrace LCA) should also be identified, as appropriate. The correct reference for the IverHeath Mixed Use Terrace LCA is LCA22.4, not LCA04.

- 2.1.11 The visual baseline section does not describe night-time views, nor does it assess the value attached to views.
- 2.1.12 Table 7.2: Representative Assessment Viewpoints is confusing in that it identifies 4 No. visual assessment viewpoints yet assessments are carried out for 10 No. visual receptors located across a wider area, as summarised in Table 7.3: Summary of Residual and Significant Effects.
- 2.1.13 The LVIA graphics are generally clear. However on Figure 7.1, the bridleway along the western site boundary has been masked out by the red line boundary, the 1km buffer should be marked as a 1km study area and the symbols for Public Rights of Way should be included in the legend. An annotated aerial photograph would be a useful additional graphic to allow the reader to more readily appreciate existing conditions.

Assessment of Effects

Construction

- 2.1.14 Moderate adverse effects have been identified for a number of visual receptors during the construction phase but, unlike those identified in the operational phase, these have been assessed as non-significant due to their temporary nature.

Operation

- 2.1.15 The assessment of landscape change has been correctly based on existing conditions that include mineral workings (paragraph 7.58). No assessment has been undertaken of likely effects based on the future baseline, with reference to the restoration plan for the minerals working site. **This is included as a potential Regulation 25 request in the summary table below.**
- 2.1.16 The magnitude of change assessment refers to the loss of vegetation types, the presence of new large-scale buildings, the increase in the built nature of the area, access points and road widening works. However, it does not assess the effects on any of the key landscape characteristics or landscape and visual sensitivities identified in the published landscape character assessments (e.g. *“long views over arable fields”*, *“undeveloped spaces/fields between areas of development which provide reminders of the former land use and origins of this landscape”*, and *“the hedgerow network, which provides visual unity and a wildlife corridor, connecting fragmented habitats”*). A finer-grain landscape assessment would enable fuller identification of effects at a local level. **This is included as a potential Regulation 25 request in the summary table below.**
- 2.1.17 The LVIA judgement for the Iver Heath Mixed Use Terrace LCA magnitude of change at Year 0 states that *“This LCA is typically settled and built development will not be out of place in this context”* (paragraph 7.58) needs to be justified in terms of the large-scale of the proposed buildings and the value of the existing fields. **This is included as a clarification in the summary table below.**

-
- 2.1.18 GLVIA3 paragraph 6.31, p.113 notes that “*Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views.*” The high susceptibility of residents and recreational walkers to changes in their views is correctly identified in accordance with guidance set out in GLVIA3. However, the value of all views is identified as low in the LVIA (paragraph 7.66, 7.74, 7.82, 7.90, 7.99, 7.107, 7.115 etc). This value judgement has been made simply on the basis that the views are not designated or recognised in literature (see definition for low value view set out in LVIA Appendix 7.1, Table A7.1.2: Visual Sensitivity). However, low value views could be reasonably defined as those with elements that notably detract from the overall pleasantness of the view (e.g. degraded land, graffiti, or other discordant elements). Undistinguished or unremarkable views, which may not have any particularly distinctive components (either positive or negative) would still have intrinsic value and could be properly regarded as medium value views. This relatively low threshold of view value in the LVIA has resulted in relatively low findings for overall visual receptor sensitivity and this feeds into the significance of effect findings.
- 2.1.19 GLVIA3 paragraph 6.28 states that “*Consideration should be given to the seasonal differences in effects arising from the varying degree of screening and/or filtering of views by vegetation that will apply in summer and winter. Assessments may need to be provided for both the winter season, with least leaf cover and therefore minimum screening, and for fuller screening in summer conditions.*” The LVIA has not followed this best practice guidance and appears to have based the assessment on summer views. Paragraph 7.83 provides the only reference to how the views of the Proposed Scheme would differ during the winter months, stating that views would be obtained “*through the hedgerow in winter months*”. The magnitude of visual change judgements should all be based on ‘worst case’ winter views and are likely to result in higher magnitudes of change. **This is included as a clarification in the summary table below.**
- 2.1.20 The bridleway along the eastern edge of Black Park abuts a 480m section of site boundary and passes at a close distance to other sections as it veers southwest into the woodland. The bridleway is approximately 2.2km long from the A412 (Uxbridge Road) to Fulmer Common Road near the northern edge of Pinewood Studios. Approximately 1.1km of this north-south route through the woodland already abuts the tall security fence of Pinewood Studios with many open views of buildings to the rear. The Proposed Scheme will enclose views from the last remaining section of bridleway where there are eastward views from the woodland edge across open fields. It would result in an increase in the length of bridleway that is in close proximity to the security fence from approximately 1.1km to approximately 1.58km (71.8% of the route). The vertical and horizontal extent of the new built form would substantially enclose a high proportion of the existing view for those who appreciate the outward view from the woodland edge in the winter and summer of Year 1. Paragraph 7.67 describes this as “*a clearly perceptible change*” (which broadly aligns with the Table A7.1.4 definition for a medium level of visual change) rather than a “*large change in view, perhaps where a development is in close proximity to a direct line of vision, or affecting a substantial part of the view, or providing contrast with the existing view.*” (the Table A7.1.4 definition for a high level of visual change). It is likely that the proposed 10m wide (minimum) woodland buffer planting would not screen the ‘lower level elements’ of the Proposed Scheme in Year 15 winter views and that filtered views of the proposed buildings would be obtained. The LVIA is
-

likely to be under-estimating the likely magnitude of visual change as a result. **This is included as a potential Regulation 25 request in the summary table below.**

- 2.1.21 The visual assessment for 'Users of Pinewood Road' states that it is likely that new entrances will be visible but this assessment does not take into account other urbanising features such as new road markings, lighting columns and signage, or the effects of hedgerow loss within vehicular sightlines at the proposed junctions. **This is included as a clarification in the summary table below.**
- 2.1.22 The visualisations prepared to inform the assessments of visual change have been based on the Green Infrastructure and Building Height Parameter Plan. It is surprising that the visualisations along Pinewood Road do not include the junctions required under the Access Parameter Plan. **This is included as a clarification in the summary table below.**
- 2.1.23 The LVIA has been based on the parameter plans and the information set out in Environmental Statement paragraph 4.20. The Green Infrastructure (GI) Parameter Plan states that the peripheral GI corridors will comprise boundary treatments and standoffs, protection of existing landscape features, provision of new/enhanced landscape and ecology with 10% minimum biodiversity net gain, and a strengthened landscape frontage along Pinewood Road. It specifies that a 15m depth of woodland planting will be provided adjacent to residential properties. Paragraph 7.52 identifies a proposed 10m minimum deep woodland alongside Black Park but this is not included in the LVIA assumptions (Paragraph 7.146) or the GI Parameter Plan. The photomontages do not reflect the GI Parameter Plan proposals and the visual impact mitigation shown on these photomontages cannot therefore be relied upon to inform the visual impact assessments. The LVIA can only take account of a very limited amount of woodland planting adjacent to residential properties as a robust visual enclosure mitigation measure. **This is included as a clarification in the summary table below.**

Cumulative Effects

- 2.1.24 The approach to assessing cumulative effects set out in Chapter 12 and Appendix 13.1 is considered appropriate.

Mitigation and Monitoring

Construction

- 2.1.25 Paragraph 7.51 states that standard good management practices will be adopted during the construction phase, and that these will be secured by a Construction Environmental Management Plan (CEMP), including:
- Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS827:2005 Trees in relation to construction);
 - Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS827:2005 Trees in relation to construction);

-
- Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009); and
 - Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.

Operation

2.1.26 Paragraph 7.52 states that the features of the Proposed Development that have been included with the specific purpose of minimising impacts on landscape and visual receptors (i.e. embedded design mitigation) include:

- Keeping building heights lower in proximity to visual receptors (and particularly residential receptors);
 - Retaining all high and medium value trees with appropriate root protection buffers where possible, as identified by the Arboricultural Impact Assessment (see Appendix 7.2);
 - Where vegetation losses are unavoidable (e.g. at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;
 - Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;
 - Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points will need punch through;
 - Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;
 - Within the green infrastructure buffer, and adjacent to Black Park where the PRoW is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;
 - Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/ year);
 - Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties. This is further detailed in Appendix 4.1 Outline Lighting Strategy.
-

- 2.1.27 It should be noted that building heights have not been kept lower in proximity to visual receptors using the bridleway alongside Black Park.
- 2.1.28 A Landscape and Ecological Management Plan should be prepared at Reserved Matters stage. This is included as an additional mitigation measure in **Table 5.1**.
- 2.1.29 There are no proposals for monitoring landscape and visual mitigation during the construction and operation of the Proposed Scheme, and none are considered appropriate.

Residual Effects

- 2.1.30 Residual short term significant effects are correctly summarised in LVIA 7.151 and are as follows:
- The inevitable landscape effect resulting from the change on Site from open fields to a developed area, within the Iver Heath Mixed Use Terrace LCA (moderate adverse at Year 0);
 - The visual effect on residents at Park Lodge Farm in the early years of operation before the planting mitigation matures to screen views (moderate-major adverse Year 0);
 - The visual effect on the local community to the east of Pinewood Road in the early years of operation before the planting mitigation matures to screen views (moderate adverse Year 0);
 - The visual effect on the residents at Royal Lodge/Park Lodge in the early years of operation before the planting mitigation matures to screen views (Moderate-major adverse at Year 0);
 - The visual effect on the local community to the west of Pinewood Road in the early years of operation before the planting mitigation matures to screen views (moderate adverse Year 0); and
 - The visual effect on users of Pinewood Road in the early years of operation before the planting mitigation matures to screen views (moderate adverse Year 0).
- 2.1.31 Residual long term significant effects are correctly summarised in paragraph 7.152 and are as follows:
- The inevitable landscape effect resulting from the change on Site from open fields to a developed area, within the Iver Heath Mixed Use Terrace LCA (moderate adverse at Year 15); and
 - The visual effect on the residents at Royal Lodge/Park Lodge as a result of being surrounded by new woodland belts beyond which are relatively large buildings potentially at a minimum of 50-80m away (Moderate adverse at Year 15 for layout PP3A, or moderate-major adverse at Year 15: for layout PP3B).

Commentary on the Conclusions of the ES

- 2.1.32 The landscape and visual impact assessment broadly follows the methodology set out in paragraphs 7.20 to 7.33.

-
- 2.1.33 The landscape impact assessment does not tease out what is important in the local landscape, what sensitivities are affected and what key characteristics are lost. However, in spite of this lack of detail and transparency, this review agrees with the LVIA conclusion of a moderate adverse impact on the Iver Heath Mixed Use Terrace LCA at Year 15.
- 2.1.34 This review considers that the magnitude of visual change has been under-reported in many cases due to the use of a relatively low threshold for defining view value. The visual impact assessment does fully identify the changes to existing views, particularly in the case of views from the Black Park bridleway and Pinewood Road as noted above.
- 2.1.35 The photomontages are based on an assumption that tree and shrub vegetation will be established across the length and depth of the GI corridors identified on the GI Parameter Plan. This assumption is incorrect as the GI Parameter Plan states, amongst other things, that the peripheral GI corridors will comprise boundary treatments and standoffs, protection of existing landscape features, provision of new/enhanced landscape and ecology with 10% minimum biodiversity net gain. The GI Parameter Plan only delivers a 15m depth of woodland planting adjacent to residential properties. The reference to a strengthened landscape frontage along Pinewood Road, whether it be an infilled hedgerow or a new tree/shrub belt, does not provide sufficient detail for any photomontage modelling or additional visual enclosure that could properly be taken into account in the visual impact assessment.

Commentary on the Adequacy of NTS

- 2.1.36 The landscape and visual section of the NTS clearly identifies all the significant effects identified in the LVIA chapter. The purpose of the peripheral belt of green infrastructure is not restricted to the delivery of vegetation for screening purposes and additional detail would be helpful so that it is more easily understood by the general public.
- 2.1.37 The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of significant effect falls from Year 0 to Year 15 should also be provided. **This is included as a potential Regulation 25 request in the summary table below.**
-

Summary of Clarifications Required	
1.	Justify the magnitude of change at Year 0 in terms of the large-scale of the proposed buildings and the value of the existing fields.
2.	Identification of visual effects based on 'winter' views.
3.	Identification of hedgerow loss along Pinewood Road resulting from proposed junctions and vehicular sightlines.
4.	Amendments to photomontages to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.
5.	Revisions to the landscape and visual impact assessment to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.
Summary of Potential Regulation 25 Information Requests	
6.	Assess the likely effects based on the future baseline, with reference to the restoration plan for the minerals working site.
7.	Preparation of a local landscape character area to better inform identification of landscape effects.
8.	Provide justification as to the level of the effect in Year 15 with specific reference to the effectiveness of the woodland buffer in winter.
9.	The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of significant effect falls from Year 0 to Year 15 should also be provided.

2.2 Chapter 10: Climate Change

Policies, Guidance, Legislation and Standards

- 2.2.1 The chapter identifies the Climate Change Act 2008 (updated in 2019) as setting a legally-binding target for the UK to reduce its CO2 emissions. It notes that South Bucks District Council (SBDC) and Buckinghamshire County Council have both declared a climate emergency in September 2019, although it is not yet clear if and how this will translate into policy changes for the built environment.
- 2.2.2 The Council's adopted Core Strategy is cited as 'include(ing)' a number of policies which reference climate change, including Core Policy 8 and Core Policy 12. This implies that there are further policies or planning guidance relevant to climate change which have not been stated. **This is added as a clarification point in the table below.**
- 2.2.3 In terms of guidance, the Applicant has identified the IEMA Principles Series: Climate Change Mitigation and EIA, the IEMA EIA Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance and the IEMA EIA Guide to: Climate Change Resilience and Adaptation. It should be noted that the latter IEMA guidance has been superseded in June 2020, and this relates to a potential Regulation 25 request below.

Assessment Methodology and Significance Criteria

- 2.2.4 The chapter covers both climate change mitigation (GHG reduction) and climate change adaptation and resilience (the sensitivity of the project to a changing climate). The scope of the assessment was not agreed through a formal EIA Scoping process, but some justification provided as to scoping out an assessment of climate adaptation and resilience has been provided.

-
- 2.2.5 With respect to climate change adaptation/resilience, whilst the reviewer does not necessarily disagree with the justification of showing how extreme weather has been accounted for in the emerging scheme design, the assessment does not clearly follow the IEMA guidance identified in the chapter (which has been updated in June 2020). The correct guidance should be applied to the assessment, including providing a distinction between climate vulnerability and in-combination climate effects, as it is not clear whether the effects identified in other parts of the ES could become significant in the presence of UKCP18 projections. **This is provided as a potential Regulation 25 in the table below.**
- 2.2.6 With respect to climate change mitigation, this includes an assessment of GHG emissions associated with the construction and operation phases under 'scope 1, 2 and 3' of the GHG Protocol, compared against an existing and future baseline. This is considered appropriate and good practice, although there are some notable sources of emissions that have not been included, as described below.
- 2.2.7 The sensitivity of the receptor (the Earth's climatic system) is considered to be high, which is agreed. Criteria for the magnitude of change is set out in Table 10.4 which identifies thresholds for different categories of impact as being >5%; 3-5%; 1-3%; and <1%, relative to local / regional baseline emissions and future UK Carbon Budgets.
- 2.2.8 Major and moderate effects are considered significant, minor effects may be significant but subject to professional judgement and negligible effects are not significant.

Construction

- 2.2.9 The construction phase emissions are assessed between 2022 and 2024, to reflect the proposed programme. GHG emissions associated with construction activities have been based on construction benchmark factors from the Royal Institute of Chartered Surveyors (RICS) embodied carbon guidance (1,400 kgCO₂e per £100k project value).
- 2.2.10 GHG emissions associated with embodied carbon in building materials are based on benchmarked emissions per unit of development area, in accordance with RICS 2014 Embodied Carbon methodology. Estimates of construction waste emissions have been calculated based on benchmarks provided by BRE's 2012 Waste Benchmark Data. This is considered acceptable.

Operation

- 2.2.11 The operational assessment is made against the year 2022, which reflects a worst-case assessment due to grid and transport related emissions being considered to reduce over the lifetime of the development.
- 2.2.12 It is agreed that GHG emissions generated as a result of mains water consumption, wastewater treatment, are likely to be small compared to emissions from energy consumption and can be excluded from the assessment, although RICS guidance is available to help quantify this. However, there is no evidence to justify the exclusion of emissions from the transport and treatment of waste, given that the scheme will attract 2 million visitors annually, many of whom would be expected to drive. It is requested that the Applicant takes this into account and estimates emissions associated with the operational servicing activities and traffic related emissions from the c. 2 million annual visitors. **This is provided as a potential Regulation 25 in the table below.**
-

- 2.2.13 Paragraph 10.67 states that “An estimate of the annual energy demands for the Proposed Scheme has been prepared based on benchmark figures from similar schemes”. Clarification is required as to why indicative operational emissions have not been based upon the supporting Energy Strategy for the Proposed Development. **This is added as a clarification point in the table below.**

Baseline Conditions

- 2.2.14 Paragraphs 10.39 to 10.41 describes the baseline emissions from the site (34.4ha of mainly arable land) and have assumed them to be zero. This is considered acceptable, as it provides a reasonable worst-case position against which to consider the net change in emissions.
- 2.2.15 Table 10.6 shows the Local Authority emissions for 2018, against which the Proposed Development’s emissions would be contextualised. Table 10.7 describes the various UK Carbon Budgets, used to show how much budget the UK has allowed for under the operational and construction phases. Paragraphs 10.47 to 10.49 describe the future baseline appropriately.

Assessment of Effects

- 2.2.16 The assessment of effects is made following the adoption of primary mitigation described below and is based on an estimate GHG emissions resulting from the construction and operation of the Proposed Development and to evaluate these emissions within the context of GHG emissions at a range of geographical scales including recent emissions from the local area (SBDC administrative area), the region (South Buckinghamshire) and to future carbon budgets for the UK as a whole.

Construction

- 2.2.17 Paragraphs 10.51 to 10.53 describes the primary mitigation associated with the construction phase, that will be set out in the Site Waste Management Plan and Construction Environmental Management Plan, although at this stage, the effectiveness of these measures cannot reasonably be quantified.
- 2.2.18 Following the RICS guidance, Table 10.8 shows that the estimated construction site emissions would be approximately 5,600 tCO₂e. Table 10.9 shows that estimated embodied carbon would be approximately 39,739 tCO₂e. Table 10.10 estimates emissions associated with transportation of waste generated as being 74 tCO₂e. Table 10.11 shows the total construction phase emissions to therefore be 46,113 tCO₂e.
- 2.2.19 Table 10.12 refers back to the categories of impact magnitude, and the percentages of construction phase emissions in the context of the UK Carbon budget, Buckinghamshire and South Bucks emissions. In this context, the Proposed Development will clearly be very small against the whole UK carbon budget, but largest against the context of the most local levels in SBDC. This is the most appropriate context against which to compare the impacts, and it is shown this will be above 3% (3.07%) of that, which falls into the medium magnitude category shown in Table 10.4. The assessment states this magnitude (paragraph 10.63) as small, and therefore seems to be understating the effect as minor and arguing a not-significant effect. It is considered that the IEMA guidance and the methodology both point to the fact that a significant effect is expected, and therefore this

either needs to be updated, or clarification provided as to why there seems to be an anomaly. **This is provided as a potential Regulation 25 in the table below.**

Operation

- 2.2.20 The Proposed Development will incorporate the following primary mitigation for operational energy efficiency and carbon reduction:
- A “fabric first” approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2013;
 - 100% low energy (LED) lighting;
 - High efficiency gas boilers or low carbon heat pumps where heating is required; and
 - 10% of the site’s energy delivered through low carbon renewable energy.
- 2.2.21 Table 10.13 identifies year 1 to year 30 operational emissions reducing over time to reflect the decarbonisation of the grid, which is considered acceptable. It provides a cumulative 30 year (2022-2050) GHG emissions as being 31,296 tCO₂e. It should be clarified whether this actually accounts for 28 years, given the stated timescales, and what the assumed operational life is for the scheme. **This is added as a clarification point in the table below.**
- 2.2.22 This operational GHG emission is included in Table 10.14, alongside ‘process GHG emissions’, although clarification is required to explain what this includes and how it is calculated. **This is added as a clarification point in the table below.**
- 2.2.23 Table 10.15 identifies the combined operational emissions against the local total emissions and UK budgets. This identifies that operational emissions would in all cases be less than 1% and therefore lead to a negligible effect.

Cumulative Effects

- 2.2.24 Paragraphs 13.26-13.26 briefly describe the cumulative effects of the Proposed Development with other identified third-party schemes. The assessment appears to have considered the emissions associated with other schemes as part of projections of future emissions and carbon budgets at a local and national scale and considers in-combination effects as being accounted for within these targets and the individual project assessment. Whilst it is understood that there is a limitation to being able to quantify the emissions associated with the identified cumulative schemes, it is considered that the appropriate method should be to consider the net change in emissions compared to the baseline for the Proposed Development plus the cumulative schemes, against the same set of significance criteria as used in the rest of the assessment and using broad and clear assumptions. The significance of the cumulative effects should also be stated. **This is included as a potential Regulation 25 information request in the table below.**
- 2.2.25 Furthermore, with respect to the earlier comments on climate change adaptation, the June 2020 IEMA Guidance requires the consideration of in-combination effects of how the other EIA impacts could be altered by a changing climate. This is already included as a potential Regulation 25 information request in paragraph 2.2.5 above.
-

Mitigation and Monitoring

Construction

- 2.2.26 No further mitigation is proposed beyond what is outlined as primary mitigation. Whilst it is acknowledged that limited details are available at this stage, more details are required as to how carbon will be reduced and monitored in later design and construction stages. **This is added as a clarification point in the table below.**

Operation

- 2.2.27 No further mitigation is proposed in relation to operational GHG emissions. The Applicant states “*while additional mitigation could be applied and reduce emissions this would be unlikely to result in an overall beneficial effect*”. In order for this statement to be valid, the Applicant should demonstrate zero emissions baseline and then any reduction in GHG emissions would justify further mitigation and should be included within the ES. **This is included as a potential Regulation 25 information request in the table below.**
- 2.2.28 Information is required as to how operational traffic and servicing emissions can be mitigated, and how the development of other energy reduction measures will be implemented in future design stages. This is included as part of the potential Regulation 25 described above, and not repeated here.

Residual Effects

- 2.2.29 The Applicant identifies a minor adverse effect from construction phase emissions and a negligible effect from operational emissions. Due to the points raised above in this review, it is considered that the effects are understated, and should be updated. This is not therefore raised as a separate clarification/Regulation 25 request, but inherent in some of those above.

Commentary on the Conclusions of the ES

- 2.2.30 As above, the conclusions appear to understate the effects, and therefore avoid identifying potentially significant effects. The stated assumptions and limitations are acknowledged, given the design stage currently, but the Applicant has further opportunities for further mitigation and this should be clarified in the conclusions. This is not therefore raised as a separate clarification/Regulation 25 request, but inherent in some of those above.

Commentary on the Adequacy of NTS

- 2.2.31 The NTS should be updated considering the points raised above. It should also explain the assessment of climate change adaptation and resilience. **This is provided as a potential Regulation 25 in the table below.**

Summary of Clarifications Required
<ol style="list-style-type: none">1. Clarify if there are any other local policies relevant to climate change.2. Have the operational energy figures been obtained from benchmarked data from other schemes or from the scheme's Energy Strategy?3. Clarify the proposed operational design life for the scheme and clarify whether the assessment is of 28 or 30 years.4. Clarify what data the process emissions are based on.5. Provide more details as to how carbon will be reduced and monitored in later design and construction stages.
Summary of Potential Regulation 25 Information Requests
<ol style="list-style-type: none">6. Provide a more systematic assessment of climate change adaptation and resilience impacts, in alignment with the June 2020 IEMA Guidance.7. Provide an estimate of GHG emissions associated with the transportation of c. 2 million visitors and associated servicing of the scheme, and update overall residual effects accordingly.8. The residual construction phase effect is greater than the threshold for medium magnitude impact at the SBDC scale, which is inconsistent with the low category stated and avoids stating a significant effect.9. State the significance of the cumulative effects.10. The Applicant should further justify why operational mitigation measures are not proposed.11. Update the NTS to reflect the comments and include all significant effects and a description of climate change adaptation/resilience.

2.3 CHAPTER 11: Air Quality

Policies, Guidance, Legislation and Standards

- 2.3.1 Air quality legislation, guidance and standards used to inform the assessment are appropriate although there is no reference to the National Planning Policy Framework and Planning Practice Guidance which should both be included within the Chapter. **This is included as a clarification in the table below.**

Assessment Methodology and Significance Criteria

- 2.3.2 Information is not provided on consultation with South Bucks District Council or Slough Borough Council regarding the scope and methodology for the assessment. In addition, Scoping Opinion comments are not provided. The Applicant should clarify whether consultation on the scope and methodology of the assessment was undertaken and include this information (including how comments were addressed) within the Chapter. **This is included as a clarification in the table below.**
- 2.3.3 Two study areas have been assessed - Pinewood where the Proposed Development is located and Slough which is over two miles away. It is not clear why roads in Slough were assessed – presumably because they are affected by the Proposed Development. An explanation should be provided within the assessment as to why Slough has been assessed and clarification is required as to whether roads between the two study areas are affected (i.e. meet the EPUK/IAQM screening criteria). If these roads are affected and there is
-

relevant public exposure, then they should be included within the assessment. **This is included as a clarification in the table below.**

Construction

- 2.3.4 The methodology and significance criteria used to assess construction dust risk are acceptable.
- 2.3.5 Paragraphs 11.8 and 11.9 outline effects which are not significant – these effects are normally scoped out of the EIA. Paragraph 11.10 states that the *‘effects of dust and particulate matter emissions on nearby residential receptors are unlikely to be considered significant and will not be considered within the ES’* and then states that a construction dust assessment is included in Appendix 11.2. The effects of construction dust have therefore been considered within the ES and Paragraph 11.10 should be amended accordingly to avoid confusion. **This is included as a clarification in the table below.**
- 2.3.6 The significance criteria used to assess vehicle exhaust emissions associated with the construction phase are acceptable. The methodology used is largely appropriate however further information is required in relation to roads included within the assessment, model verification, and treatment of roundabouts and junctions within the dispersion model. These also apply to the Operational Phase assessment and are outlined in paragraphs 2.3.9 to 2.3.14 below.

Operation

- 2.3.7 The methodology and significance criteria used to assess air quality impacts on designated nature conservation sites are acceptable.
- 2.3.8 The significance criteria used to assess vehicle exhaust emissions associated with the operational phase are acceptable. The methodology used is largely appropriate however further information is required as outlined below.
- 2.3.9 Within both study areas sensitive receptors were included within the dispersion model which are within 200 m of roads that have not been included within the model. Predicted pollutant concentrations at these receptor locations are therefore unlikely to be correct. This applies to the following receptors:
- E18, E19 and E29: Bangors Road South and Slough Road East of the roundabout are not included in the model;
 - E9 and E32 (and possibly E10): The M25 is not included in the model;
 - E38 and E39: The A4 east of the roundabout is not included in the model;
 - E42: William Street is not included in the model;
 - E46, E47, E48 and E50: Farnham Road is not included in the model; and
 - E52 and E53: Church Street and Cippenham Lane are not included in the model.
- 2.3.10 The dispersion model should be updated to include all roads likely to affect pollutant concentrations within 200 m of sensitive receptors. The model should be rerun, and pollutant concentrations reassessed. **This is included as a potential Regulation 25 information request in the table below.**

-
- 2.3.11 Model verification for the Pinewood study area is acceptable however verification for the Slough study area is not acceptable as it used monitoring sites within 200 m of roads that have not been included in the model, and also kerbside monitoring sites (Turns Lane, Windmill, and Wellington Street) which are not recommended for the adjustment of road traffic modelling.
- 2.3.12 The Applicant should redo model verification for the Slough study area to only include monitoring sites where all roads likely to affect pollutant concentrations within 200m of the site are modelled, and to exclude kerbside monitoring sites (unless kerbside sites are relevant for exposure). **This is included as a potential Regulation 25 information request in the table below.**
- 2.3.13 Paragraph 11.21 states that *'receptors have been chosen to represent worst case public exposure at locations adjacent to roads that will see a change in traffic flow as a result of the Proposed Scheme'*. However, receptors E38 and E39 are not representative of worst-case exposure as there are sensitive receptors closer to the roundabout. The Applicant should review all sensitive receptors modelled to ensure that they are representative of worst-case public exposure and model pollutant concentrations at additional receptors if worst case exposure has not been assessed. **This is included as a potential Regulation 25 information request in the table below.**
- 2.3.14 Within the Slough study area some roundabouts appear to have been modelled as junctions. In addition, not all road links (and slip roads) at roundabouts and junctions have been included in the model. This will affect predicted pollutant concentrations at receptors located close to these roundabouts and junctions. The Applicant should review all junctions and roundabouts modelled to ensure that all road links (and slip roads) at roundabouts and junctions are included in the model and that roundabout and junction layouts within the model are correct. The model should be rerun, and pollutant concentrations reassessed. **This is included as a potential Regulation 25 information request in the table below.**

Baseline Conditions

- 2.3.15 Paragraph 11.46 reports that PM₁₀ objectives were achieved at all automatic monitoring stations in Slough in the last five years, however monitoring results are not reported. The Applicant should include PM₁₀ monitored concentrations within the baseline assessment. **This is included as a clarification in the table below.**
- 2.3.16 Clarification is required as to whether PM_{2.5} is monitored by Slough Borough Council. The Applicant should include PM_{2.5} monitored concentrations within the baseline assessment if data are available. **This is included as a clarification in the table below.**
- 2.3.17 Information is not provided on how Defra background maps compare to monitored background concentrations within Buckinghamshire Council and Slough Borough Council and therefore whether the Defra background concentrations used in the assessment are representative. However, this is unlikely to alter the assessment conclusions.

Assessment of Effects

Construction

- 2.3.18 The dust risk assessment of earthworks, construction, and trackout activities during the construction phase is acceptable.
-

- 2.3.19 Clarification is required as to whether the building onsite adjacent to Pinewood Road will be demolished as demolition activities are not included in the dust risk assessment. If demolition activities are planned the dust risk assessment will need to be revised. **This is included as a clarification in the table below.**
- 2.3.20 Figure A11.1 shows distance bands from the site boundary, however distances between the site boundary and the following sensitive receptors are not shown: Pleasant Cottage Guest House, Pinewood Manor & Goosebarry Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings. This will not alter the dust risk assessment conclusions as the sensitivity of the area is likely to remain the same (Table A11.9), however Figure A11.1 needs to be updated. **This is included as a clarification in the table below.**
- 2.3.21 Paragraph 11.77 reports that '*the construction phase of the Proposed Scheme results in an overall decrease in traffic flows on some road links within the Study Areas*'. Clarification is required within the assessment as to which roads experience a decrease in traffic flows during the construction phase and why. **This is included as a clarification in the table below.**

Operation

- 2.3.22 The assessment of air quality impacts on Kingcup Meadows and Oldhouse Wood SSSI is acceptable.
- 2.3.23 Full results from the 'Further Assessment' Do Minimum +SHR scenario outlined in paragraph 11.100 are not provided and should be included within Appendix 11. **This is included as a clarification in the table below.**
- 2.3.24 Paragraph 11.120 mentions '*the magnitude of change*' in relation to the exposure of future users of the Proposed Scheme to pollutant concentrations exceeding the relevant air quality objectives. However, as the assessment only considers pollutant concentrations for the opening year 'magnitude of change' is not relevant. Paragraph 11.120 should be amended to remove 'magnitude of change' which is not relevant to the assessment. **This is included as a clarification in the table below.**

Cumulative Effects

- 2.3.25 The operational phase assessment does not account for changes in traffic flows resulting from any committed and allocated developments within the Local Plan. However, a cumulative assessment was undertaken in Chapter 13: Assessment of cumulative effects.
- 2.3.26 The cumulative effects assessment predicts the annual mean NO₂ impact at ground floor as being negligible at 51 receptors, slight adverse at four receptors, moderate adverse at one receptor and substantial at one receptor.
- 2.3.27 The operational phase assessment predicts the annual mean NO₂ impact at ground floor as being negligible at 53 receptors, slight adverse at one receptor, moderate adverse at one receptor, moderate beneficial at one receptor and substantial beneficial at one receptor.

Mitigation and Monitoring

Construction

- 2.3.28 Mitigation of construction dust is proposed through implementation of mitigation measures through a Dust Management Plan as part of a Construction Environmental Management Plan. The proposed construction dust mitigation measures outlined in Appendix 11.2 are adequate, however they need to be cross referenced in the 'Secondary Mitigation or Enhancement' section of Chapter 11. **This is included as a clarification in the table below.**
- 2.3.29 It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.
- 2.3.30 It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.

Operation

- 2.3.31 Supplementary mitigation for the operational phase is not proposed. Mitigation may be required during the operational phase pending the outcome of information requests in the table below.

Residual Effects

- 2.3.32 Residual effects are discussed in paragraphs 11.88 to 11.90, however as no mitigation is proposed this text should be amended to avoid confusion and readers should be referred to the conclusions in paragraph 11.85. **This is included as a clarification in the table below.**

Commentary on the Conclusions of the ES

- 2.3.33 Clarifications are required in line with the comments above to determine whether the conclusions of the ES are appropriate.

Commentary on the Adequacy of NTS

- 2.3.34 The NTS does not include the results of the construction dust assessment. The NTS should include these results. **This is included as a clarification in the table below.**
-

Summary of Clarifications Required

12. There is no reference to the National Planning Policy Framework and Planning Practice Guidance which should both be included within the Chapter.
13. Clarify whether consultation on the scope and methodology of the assessment was undertaken and if it was this information should be included within the Chapter.
14. Paragraph 11.10 states that the '*effects of dust and particulate matter emissions on nearby residential receptors are unlikely to be considered significant and will not be considered within the ES*' and then states that a construction dust assessment is included in Appendix 11.2. The effects of construction dust have therefore been considered within the ES and Paragraph 11.10 should be amended accordingly to avoid confusion.
15. An explanation should be provided within the assessment as to why Slough has been assessed and clarification is required as to whether roads between the two study areas are affected (i.e. meet the EPUK/IAQM screening criteria). If these roads are affected and there is relevant public exposure, then they should be included within the assessment.
16. The Applicant should include PM10 monitored concentrations within the baseline assessment.
17. Clarification is required as to whether PM2.5 is monitored by Slough Borough Council. The Applicant should include PM2.5 monitored concentrations within the baseline assessment if data are available.
18. Clarification is required as to whether the building onsite adjacent to Pinewood Road will be demolished as demolition activities are not included in the dust risk assessment. If demolition activities are planned the dust risk assessment will need to be revised.
19. Figure A11.1 needs to be updated to show distance bands to Pleasant Cottage Guest House, Pinewood Manor & Goosebarry Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings.
20. Clarification is required within the assessment as to which roads experience a decrease in traffic flows during the construction phase and why.
21. Full results from the 'Further Assessment' Do Minimum +SHR scenario outlined in paragraph 11.100 are not provided and should be included within Appendix 11.
22. Paragraph 11.120 should be amended to remove 'magnitude of change' which is not relevant to the assessment.
23. Residual effects are discussed in paragraphs 11.88 to 11.90, however as no mitigation is proposed this text should be amended to avoid confusion and readers should be referred to the conclusions in paragraph 11.85.
24. The proposed construction dust mitigation measures outlined in Appendix 11.2 are adequate, however they need to be cross referenced in the 'Secondary Mitigation or Enhancement' section of Chapter 11.
25. The NTS should include result of the construction dust assessment.

Summary of Potential Regulation 25 Information Requests

26. The dispersion model should be updated to include all roads likely to affect pollutant concentrations within 200 m of sensitive receptors. The model should be rerun, and pollutant concentrations reassessed.
27. The Applicant should redo model verification for the Slough study area to only include monitoring sites where all roads likely to affect pollutant concentrations within 200m of the site are modelled, and to exclude kerbside monitoring sites (unless kerbside sites are relevant for exposure).
28. The Applicant should review all sensitive receptors modelled to ensure that they are representative of worst-case public exposure and model pollutant concentrations at additional receptors if worst case exposure has not been assessed.
29. The Applicant should review all junctions and roundabouts modelled to ensure that all road links (and slip roads) at roundabouts and junctions are included in the model and that roundabout and junction layouts within the model are correct. The model should be rerun, and pollutant concentrations reassessed.

3.0 ES COMPLIANCE REVIEW

3.1.1 This compliance review has considered the performance of the ES against the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Regulations are supported by case law and developed through judicial review. The reviewer is cognisant that the ES accompanies an Outline Planning Application with all matters reserved. Compliance is considered purely against the regulatory requirements; however commentary and ratings also reflect consideration of established good practice for outline applications and what information could reasonably be expected at this stage. Where the reviewer has raised concerns in the below table, the Applicant should consider the further details and respond to these.

Table 3.1 Compliance with the EIA Regulations

Specified Information	Compliance (Yes / Partial / No)	Further Details	Rating (Acceptable/ Concerns/ Unacceptable)
Regulation 18.3(a) and Schedule 4(1) Does the ES contain a description of the proposed development comprising information on: <ul style="list-style-type: none"> - The site; - Location; - Design; - Size parameters; - Physical characteristics, including land use - Demolition and construction activities; - Operational phase characteristics, such as energy demand and usage, natural and quantity of materials and natural resources (including water, land, soil and biodiversity) used; - Estimate of expected residue emissions such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste. 	Partial	<p>The ES accompanies an Outline Application with all matters reserved. Chapter 3 (Description of the Site and Surrounding Area) presents summary information on the site location with further detail in technical chapters. Supporting maps and illustrations are provided (including red line boundary extending to include Five Points Roundabout), as well as information on previous and current land use and proximity of designated sites.</p> <p>Chapter 4 (The Proposed Scheme) presents outline information on the proposals with maximum parameters stated for floorspace area for a visitor attraction, production studio and education and business hubs, number of parking spaces for car, coach and cycle and minimum area of green infrastructure (Table 4.1 and Figure 4.10). In addition, estimated operational visitor numbers are stated as 2 million per annum. No further information is presented at outline stage as to what form the visitor attraction or associated facilities will take.</p>	Concerns

		<p>The following issues were noted:</p> <ul style="list-style-type: none"> • Figure 4.10 (PP7 Development numbers and yield) specifies area of the site as 32.6ha and specifies maximum area covered by parameter elements. However there is no figure by hectare provided for Education and Business Hubs. It is unclear if this is within the parameters of the production studio or additional, as the land uses do not sum to the figures of 32.6ha. Clarification is required as to the area (hectares) of the Education and Business Hubs in addition to floorspace stated. • Green Infrastructure parameter is stated as “no less than 9.8ha” (Table 4.1). However, Figure 4.10 specifies Green Infrastructure as 10.3ha. Further information is required to confirm correct parameters for green infrastructure. • In addition, Biodiversity Net Gain of “at least 10%” is specified. It should be noted that in terms of Biodiversity Net Gain it is more complex than simple area coverage of green infrastructure, with connectivity, nature and quality of habitat of primary importance to achieving percentage. • Whilst the notes in Figure 4.10 specify Black Park Buffer and Amenity Buffer ‘up to 30m wide’ no minimum parameter width is stated in the parameter table. Reference is made within paragraph 4.20 to a 25m buffer and <i>“along points of access, the green infrastructure boundary will be narrowed”</i> The parameter plans should make clear the minimum buffer width as well as the maximum to highlight the range. • Reference is made to minimum and maximum numbers of buildings within the visitor attraction and education and business hubs; however no figure is provided for the production studios. Clarification is required as to whether minimum/maximum number of buildings are fixed as a parameter as not specified on plans/figures submitted. • The ES states that the construction programme and phasing is not known at this time but <i>“could be built out over approximately 2 years...it may occur over a greater number of years, earliest practicable completion has been used within the EIA to establish a basis for assessments</i> 	
--	--	--	--

		<p>and sensible/worst case" (paragraph 4.37) It should be noted that for some assessments a shorter timeframe results in less significant 'temporary' construction effects. The assessments should reflect the uncertainty as to the programme and phasing and reflect the worst-case scenarios if these are based on a longer than 2-year construction timeframe.</p> <ul style="list-style-type: none"> The Applicant has scoped out consideration of waste as unlikely to have significant effects, however Schedule 4(1) of the EIA Regulations require that the ES should provide within the description of the proposals an estimate of the anticipated waste generated for both construction and operation phases. Whilst accepted that this is an outline application, and a waste strategy will be prepared at Reserved Matters stage; the Applicant should provide worst case parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals. 	
<p>Regulation 18.3(b) and Schedule 4(4)</p> <p>Does the ES contain a description of the likely significant effects of the proposed development on the environment from the construction, demolition and operational phases?</p>	Yes	<p>Within each of the technical chapters the predicted significance of effects are clearly stated in bold with equal prominence afforded to adverse and beneficial effects e.g. Table 7.3. Where scoped into the assessment this considers both construction and operational phases. No demolition works are anticipated.</p>	Acceptable
<p>Regulation 18.3(c) and Schedule 4(7)</p> <p>Does the ES contain a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment in the construction and operational phases? This should include the extent to which they are avoided, prevented, reduced or offset.</p>	Yes	<p>The approach to mitigation within the assessments is outlined in Chapter 2 (paragraph 2.26). Within technical chapters mitigation measures are identified to avoid, reduce or offset the scale of impact and significance of effect. The measures are stated prior to determination of residual effects.</p> <p>Table 14.3 within Chapter 14 (Summary of ES and Schedule of Mitigation) presents a summary of various mitigation measures proposed in technical chapters, and by nature of the mitigation. The ES redacts information on secondary mitigation in the table. It is assumed this is in relation to protected species and is therefore appropriate.</p>	Acceptable

Regulation 18.3(d) and Schedule 4(2) Does the ES contain a description of the reasonable alternatives studied by the developer (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for the option chosen, including a comparison of the environmental effects?	Yes	Chapter 5 provides a brief summary of the alternatives considered by the applicant which are limited to 2 design options for the layout of the visitor attraction (Figure 4.4 and 4.5). The ES asserts that the alternative layouts only have implications for landscape and visual receptors with effects for each layout reported in Chapter 7. It is not clear from the ES whether a preferred layout option has been determined at this stage, however further detail on design iterations and related comparison of environmental effects would be required at reserved matters stage. Rationale for not considering alternative sites is stated and is appropriate. The future baseline development “do nothing alternative” is presented within the technical chapters.	Acceptable
Regulation 18.4(a) Is the ES based on the most recent scoping opinion?	N/A	The Applicant undertook an internal scoping process, without provision of a scoping report or a request for a Scoping Opinion from the LPA. The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the scoping out of topics from further consideration. Sub topic issues scoped out are identified in the relevant technical chapter (e.g. Chapter 6 Socio-Economics and Human Health, paragraph 6.7). Whilst there is no requirement within the EIA Regulations for an applicant to have to consult at an early stage or request a Scoping Opinion it is the intention of the EIA Directive and established good practice that this is done. Concerns have been raised elsewhere in this compliance review as to the scope of the EIA.	N/A
Regulation 18.4(b) Does the ES include reasonable data/information required to reach a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment?	Yes	Within technical chapters, and supported by appendices, survey data is presented that has been used to inform the assessments. The assessments use appropriate good practice methodologies, guidance and thresholds where appropriate to interpret the data and determine significance of effect e.g. Chapter 8 (Biodiversity) and Appendix 8.1.	Acceptable
Regulation 18.4(c) Has the ES taken into account the results of any relevant UK environmental assessment, which are	No	Reference is made within the ES to a lapsed planning consent for 5 Ways Roundabout however no reference is made to any statutory or non-statutory environmental assessments previously undertaken for this application. No reference is	Acceptable

reasonably available, with a view to avoiding duplication of assessment?		made to any previous environmental assessment undertaken for ongoing remediation of minerals workings on site. However given the nature and location of the proposals, and the time lapse since completion of any other assessments the assessment would be unlikely to be duplicating work.	
Regulation 18.5. Has a statement of competency been provided by the developer confirming that the ES has been prepared by competent experts and outlining their relevant expertise?	Yes	A Statement of Competency is provided within Appendix 1.2 that lists relevant qualifications and experience of both ES co-ordinators and topic specialists. All have appropriate professional qualifications for technical chapters authored.	Acceptable
Schedule 4(3) Does the ES describe the current state of the environment and outline the likely evolution thereof without the proposed development on the basis of availability of environmental information and scientific knowledge?	Yes	Each technical chapter outlines both the current baseline and how the baseline would be anticipated to develop in the absence of the proposals. This is done through collation and interpretation of survey data using established good practice methodologies e.g. Chapter 9 (Transport) Table 9.4 and Appendix 9.3, and paragraph 9.49.	Acceptable
Schedule 4(4) Has the ES identified factors likely to be significantly affected by the proposed development, including: <ul style="list-style-type: none"> - Population; - Human Health; - Land; - Soil; - Water; - Biodiversity (fauna and flora); - Air; - Climate; - Material assets; - Cultural Heritage; and - Landscape. 	Yes	<p>The Applicant undertook an internal scoping process with topics scoped into the assessment as likely to be significantly affected clearly identified within the ES.</p> <p>The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the scoping out from further consideration within the EIA process the following topics:</p> <ul style="list-style-type: none"> • Agricultural land (soils) • Archaeology (cultural heritage) • Built heritage (cultural heritage) • Water resources, Flood Risk and Drainage (water) • Lighting (population, human health and biodiversity) • Risk or Major Accidents and/or disasters • Materials and Waste • Ground conditions and contamination (soil) <p>The rationale for scoping out of agricultural land, references previous soil quality on the site prior to mineral extraction activities, with no assessment of soil quality on the site (still</p>	Concerns

		<p>under restoration) provided. Buckinghamshire Council may have additional information on the quality or importance of agricultural soils on the site following the required restoration of the quarry activities to agricultural use. However, in principle the rationale appears sound.</p> <p>In relation to material assets no reference is made within the ES to the potential for further mineral reserves on or in proximity to the site. Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.</p>	
<p>Schedule 4(5)</p> <p>Does the ES include a description of the likely significant effects from the proposed development resulting from</p> <ul style="list-style-type: none"> - Construction and demolition activities; - Use of natural resources (land, soil, water, biodiversity); - Air pollution; - Noise; - Vibration; - Light; - Heat and radiation; - Nuisances; - Waste; - Cumulation of effects with other existing and approved developments; 	Partial	<p>The assessments of significance within technical chapters consider, where appropriate the different phases of the proposals and the direct and in-direct effects. The assessment has been tightly scoped with some elements identified as unlikely to be significant with implementation of standard mitigation for inclusion at reserved matters stage e.g. lighting strategy, waste strategy, CEMP etc. This approach is acceptable for outline applications and where relate to standard mitigation measures.</p> <p>Cumulative effects have been considered separately within Chapter 13 (Cumulative Effects Assessment) and consider both multiple effects of the proposals upon a receptor and effects of the proposals with other proposed/consented developments.</p>	Acceptable
<p>Schedule 4(6)</p> <p>Does the ES contain a description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack</p>	Yes	<p>Limitations in the data or survey methods and any assumptions made in the assessments are highlighted within technical chapters e.g. Chapter 11 (Air Quality) Paragraph 11.124.</p>	Acceptable

of knowledge) encountered compiling the required information and the main uncertainties involved			
Schedule 4(8) Does the ES contain a description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU(3) of the European Parliament and of the Council or Council Directive 2009/71/Euratom(4) or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies	Yes	The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the scoping out from further consideration within the EIA process of vulnerability of the development to risks of major accidents and/or disasters.	Acceptable
Schedule 4(9) Does the ES contain a non-technical summary (NTS) of the information provided under paragraphs 1 to 8.	Yes	A stand-alone NTS has been provided under separate cover to facilitate consultation. It's presentation and content have given due consideration to the anticipated audience and reflect the contents of the main ES.	Acceptable
Schedule 4(10) Does the ES contain a reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	Yes	The ES provides references to all reports/studies/surveys/data sources used in the assessments presented within the ES using footnotes (e.g. Chapter 6 Socio-Economics and Health - References).	Acceptable

4.0 STANDALONE REPORTS REVIEW

4.1 Sustainability Statement Review

Scope of Review

4.1.1 This review:

- Highlights the key national planning policies and Buckinghamshire Council local planning policies relating to sustainability.
- Reviews the Screen Industries Global Growth Hub Sustainability Statement against the key sustainability planning policies, taking into consideration the outline nature of the application.

4.1.2 This review has included a review of the following sections of the Sustainability Statement:

- Sustainable design
- Mitigating and adapting to climate change.

National Planning Policy

4.1.3 The National Planning Policy Framework (NPPF) provides three overarching goals relating to economic, social and environmental objectives. They provide a framework by which local policies can achieve sustainable development.

Local Planning Policy

4.1.4 As part of the validation requirements a Sustainability Statement is required to support planning applications, including Outline Applications. As a minimum the statement should cover the following aspects:

- set out the energy efficiency of the proposed development, covering both operational energy and CO₂ issues, and consideration of options for renewable energy;
- set out the environmental implications of the use of the building materials (and use of recycled materials) proposed in the development;
- show how use of sustainable drainage systems and water efficiency will be incorporated;
- show consideration for brownfield sites;
- show consideration for water manage, promoting resource efficiency;
- show how features of the site (e.g. topography and orientation) have informed sustainable design principles;
- show the predicted energy demand of the proposed development and the degree to which the development meets current energy standards; and
- where appropriate, include a Building Research Establishment Environmental Assessment Method (BREEAM) rating.

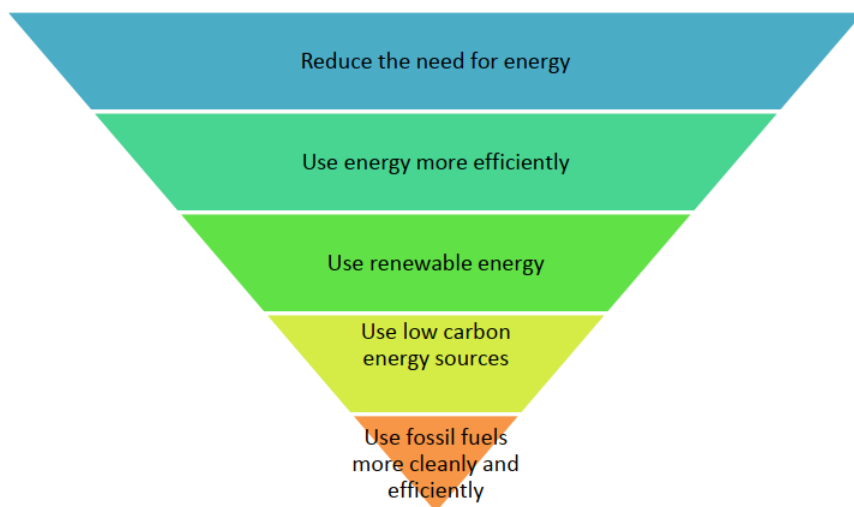
4.1.5 These requirements are supported by various local planning policies.

South Bucks Local Development Framework, Core Strategy, Development Plan Document, Adopted February 2011

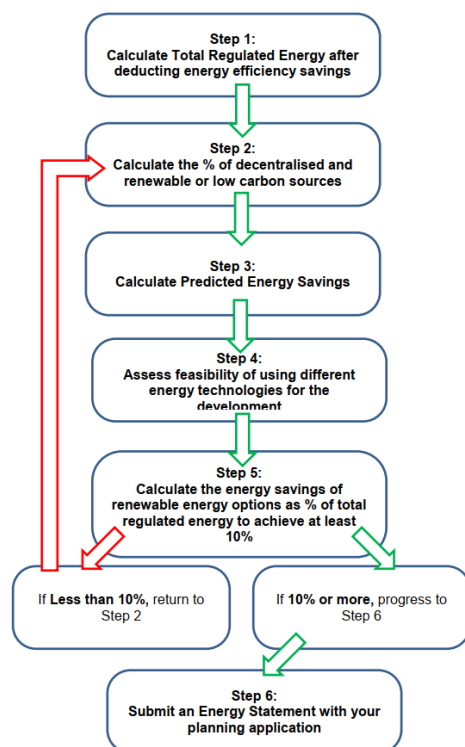
- 4.1.6 Core Policy 7: Accessibility and Transport – This policy is expected to be addressed by the Transport Statement and as such has not been reviewed as part of this report.
- 4.1.7 Core Policy 12: Sustainable energy – 10% of the development's energy is to be secured from decentralised and renewable or low-carbon sources. Further guidance on how this be achieved is provided in the Sustainable Construction and Renewable Energy SPD.
- 4.1.8 Core Policy 14: Environmental and Resource Management – new development must be water efficient and include Sustainable Urban Drainage Systems, protect and enhance water quality, seek improvement in air quality and minimise noise impacts.

Chiltern District Council Sustainable Construction and Renewable Energy Supplementary Planning Document, Adopted February 2015

- 4.1.9 Applications made after 1st April 2020 should use the information on the planning validation webpage which includes the Chiltern Sustainable Construction SPD. The SPD summarises the policies which are relevant from the Core Strategy for Chiltern District, Local Development Framework, Adopted November 2011. The applicant has not referred to either the Sustainable Construction SPD or the Chiltern Core Strategy in their Sustainability Statement.
- 4.1.10 Policy CS4: ensuring that development is sustainable - To ensure long-term sustainability of development and help contribute towards national targets to reduce overall CO₂ emissions, the Council will expect all new developments to have regard to the sustainable development principles. Examples are provided in an appended table within the SPD and includes energy consumption, renewable and low carbon energy sources, water consumption and quality, flood risk and SuDS, air quality, noise, biodiversity and waste. This policy is broader and more robust than the policies sited in the South Bucks Core Strategy.
- 4.1.11 Policy CS5: Encouraging renewable schemes - 10% of a major development's energy requirements are to be delivered from decentralised and renewable or low carbon sources. The Council will also encourage the incorporation of combined heat and power schemes. requirements are to be sourced from decentralised and renewable or low-carbon sources. This policy is broadly aligned with Core Policy 14 of the South Bucks Core Strategy.
- 4.1.12 Although there is reference to BREEAM there is no formal requirement for an assessment to be undertaken.
- 4.1.13 The SPD encourages developments to follow the energy hierarchy in order to reduce its energy demand and achieve a low carbon development.



- 4.1.14 CS5 requires an Energy Statement to be produced for major developments. Given the application is an Outline Application the Energy Statement will need to show how the proposed development will achieve the requirements of Policy CS5 of the Core Strategy. Best estimates of energy use at outline application stage is acceptable.
- 4.1.15 The following flow chart summarises the content requirements for the Energy Statement.



- 4.1.16 There is no standalone energy statement provided to support the application but the energy efficiency proposals are captured within the Sustainability Statement.

Draft Chiltern and South Bucks Local Plan 2036, June 2019

- 4.1.17 The emerging Local Plan has not yet been adopted and has therefore got limited weight. However, it does show the council's commitment to sustainable design and low carbon developments.
- 4.1.18 Policy DM DP5: Climate Responsive Development requires developments to demonstrate how they will respond to climate change and proposes the adoption of BREEAM certification (although not mandatory).
- 4.1.19 Policy DM DP6 Low Carbon Development requires 20% of regulated and unregulated energy needs to be provided from on-site renewable or low-carbon technologies.

Responding to Current Planning Policy

- 4.1.20 The applicant has demonstrated a commitment to providing sustainable development through the adoption of their internal PGL Sustainability Handbook. In addition, the Sustainability Statement provides a summary of how the development intends to respond to current planning policy.
- 4.1.21 The following table shows how the Applicant has responded to the Core Policies within their Sustainability Statement.

Table 4.1 Summary of Response to Core Policies

Requirements of PlanningCurrent Policy	Included in Sustainability Statement?
South Bucks Core Policy 12: Sustainable energy	The is addressed in the Sustainability Statement: This is achieved by fulfilling the validation requirements for a Sustainability Statement, see Table 4.3.
South Bucks Core Policy 14: Environmental and Resource Management	The is addressed in the Sustainability Statement: This is achieved by fulfilling the validation requirements for a Sustainability Statement, see Table 4.3. However, air qualityand noise impacts are not discussed in the Sustainability Statement as these are addressed within the ES.
Chiltern Policy CS4	See Table 4.2.
Chiltern Policy CS5	The is addressed in the Sustainability Statement: The Applicant has committed to providing 10% the development's operational energy demand via low carbon sources.

- 4.1.22 The following table shows how the Applicant has responded to Core Policy CS4 of the Chiltern Core Strategy.

Table 4.2 Summary of Response to Chiltern Policy CS4

Summary of Sustainability Principles of Policy CS4	Included in SustainabilityStatement?
a. Locations which are easily accessible by public transport, walking and cycling and which are providedwith fast broadband services to reduce reliance on thecar;	Not included in the Sustainability Statement; however, this is covered in Chapter 9 of the ES.

b. Maximum use of previously developed land, achieving higher densities in accessible locations, making the best use of existing transport infrastructure and services;	Not included in the Sustainability Statement, however, this is covered in Chapter 9 of the ES.
c. Safer access for all types of transport and pedestrians;	Refer to Sustainable Transport Strategy.
d. Minimal disruption in terms of water, noise and light pollution in the wider environment;	Proposals for limiting water consumption are included in the Sustainability Statement. Impact on noise and light pollution is not included in the Sustainability Statement; however noise is covered in Chapter 12 and the lighting strategy is included in paragraphs 4.25 to 4.27 of the ES.
e. Minimal impact on designated local Air Quality Management Areas (AQMA);	Not included in the Sustainability Statement, but covered in the Air Quality chapter of the ES.
f. Waste management and resource efficiency, being located within existing recycling service networks or providing new recycling and waste management facilities within the development;	The Sustainability Statement commits to facilitating waste management in operation and during construction. A Materials and Waste Management Strategy is required to support the reserved matters application.
g. Use of renewable energy technology sources wherever required under Policy CS5;	See Table 4.1.
h. Use of water efficiency measures during construction projects and as part of new development to reduce consumption and ensure no detrimental impact on water quality;	The Sustainability Statement provides a range of water management strategies. At detailed design the use of rainwater harvesting will be considered. During construction there is a commitment to minimising potable water use and protecting nearby water systems. Additional detail of how this is achieved should be provided at reserved matters stage.
i. Maximum re-use of construction and demolition materials and the use of locally produced building materials wherever possible;	The Sustainability Statement commits to preparing a Site Waste Management Plan. This should be submitted alongside the reserved matters application.
j. Assessment of surface water drainage impacts and the inclusion of Sustainable Drainage Systems (SUDS) which consider all SUDS options and ground conditions, under advice set out in national policy. The design and consideration of SUDS in the Critical Drainage Areas should be given particular attention so that it will not increase the risk of flooding within the site and to adjoining land/ properties;	The applicant has committed to providing a Drainage Strategy at detailed design stage, which will consider a range of SuDS methods. This should be submitted alongside the reserved matters application.
k. Reduced risk of flooding in appropriate circumstances as a result of the new development; Preservation and enhancement of nature conservation interests and important features of the natural environment such as rivers, streams, river corridors, flood plains, trees, hedgerows, ensuring there is a net gain in the District's biodiversity resources by meeting the targets in the national and local Biodiversity Action Plans as required under Policy CS24 of this Strategy	Refer to Flood Risk Assessment

l. Protection and enhancement of the historic and cultural heritage of the District including significant assets of the historic environment such as archaeological sites, historic buildings and settlements, designated landscapes, commons, ancient woodlands and hedgerows.	Not included in the Sustainability Statement. These topics were scoped out of the ES and justification is provided in Volume 2 of the ES..
m. Remediation of contaminated land, including treatment of contaminated material in line with national policy advice;	Not included in the Sustainability Statement. Ground Conditions and Contamination was scoped out of the ES and justification is provided in Volume 2 of the ES.
n. Incorporation of cycle and vehicle parking appropriate to the needs of the site;	Not included in the Sustainability Statement, however, this is provided in Chapter 4 and Chapter 9 of the ES.
o. Travel plans for any residential development of over eighty dwellings and for other development as defined by the local transport authority in its published document (including updates) "Travel Plan Guidance for Developers"	Not included in the Sustainability Statement; however is covered in Chapter 9 of the ES and Volume 2..
p. Efficient and sustainable use of soils including taking account of the presence of the best and most versatile agricultural land when siting new development. Soil function should be maintained as far as practicable through sustainable urban drainage systems, including amongst other things, the use of water-permeable treatments for hard surfaces, thus avoiding unnecessary soil compaction and paving over soil;	Not included in the Sustainability Statement.
q. The creation of safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;	Not included in the Sustainability Statement; however is included in Chapter 6 of the ES..
r. Active contribution to the national targets for reducing CO2 emissions set out in paragraph 8.3	Paragraph 8.3 refers to domestic carbon emissions and is not relevant to this non-domestic application.

- 4.1.23 The following table shows how the Applicant has responded to the validation requirements for a Sustainability Statement. In summary, all aspects of the Sustainability Statement are addressed in adequate detail for an outline application, with the exception of the consideration of the use of brownfield land.

Table 4.3 Summary of Response to Validation Requirements

Requirements of SPD	Included in Sustainability Statement?
Set out the energy efficiency of the proposed development, covering both operational energy and CO ₂ issues, and consideration of options for renewable energy	The Sustainability Statement covers a Be Lean, Be Clean and Be Green approach to energy efficiency. It sets out considerations for renewable and low carbon technologies which are to be fully considered at detailed design stage. The connection to a heat network is considered and discounted as not feasible. The energy strategy summary considers both energy demand and carbon emissions, and there is a commitment to develop the strategy further at detailed design stage. It is recommended that an Energy Strategy supplements the detailed planning application. The Energy Strategy should fulfil the requirements as set out in the Sustainable Construction SPD and set out how relevant planning policies from both the SPD and the Core Strategy will be fully achieved.
Set out the environmental implications of the use of the	The applicant will provide a Materials and Waste Management Strategy at detailed design stage which will measures to reduce

building materials (and use of recycled materials) proposed in the development	material use and waste. It will include a whole life carbon study to study the environmental impact of proposed materials. The applicant has not suggested early design considerations which are currently being reviewed or implemented. It is recommended that material use is considered as soon as possible to make the most meaningful impact.
Show how use of sustainable drainage systems and water efficiency will be incorporated	The applicant has committed to providing a Drainage Strategy at detailed design stage, which will consider a range of SuDS methods. The proposed development will target the mandatory number of water consumption credits required for an 'Excellent' rating, as a minimum achieving a 25% reduction in water consumption for new buildings in accordance with the BREEAM Wat01 criteria. Outline suggestions of how this target may be achieved are provided.
Show consideration for brownfield sites	The applicant has made no consideration of brownfield sites in the Sustainability Statement.
Show consideration for water manage, promoting resource efficiency	The Sustainability Statement provides a range of water management strategies. At detailed design the use of rainwater harvesting will be considered.
Show how features of the site (eg topography and orientation) have informed sustainable design principles	At the Be Lean stage of the energy hierarchy passive design features should be incorporated. Although there is a strong focus on a fabric-first approach the applicant has not discussed how site features have been used to reduce energy demand. The applicant has committed to providing an overheating assessment at detailed design stage. It is recommended that this is undertaken to CIBSE TM52 as a minimum and includes climate change scenarios. The proposals include using the cooling hierarchy and promoting the use of passive design to reduce active cooling measures. It is expected that the applicant will use site features to maximise passive design measures.
Show the predicted energy demand of the proposed development and the degree to which the development meets current energy standards	The applicant has set out estimated energy demand and carbon emissions. Although it appears to achieve a 10% reduction in both energy demand and carbon emissions through the use of low carbon or renewable technologies this is not made clear in Table 4.2, providing absolute values only. Should the estimated energy demand change the low carbon reduction should also increase to continue delivering 10% of the development's estimated energy demand, as committed to elsewhere in the Sustainability Statement. The 10% energy requirement target should be a planning condition.
Where appropriate, include a Building Research Establishment Environmental Assessment Method (BREEAM) rating.	There is no policy requirement to achieve a BREEAM rating but the applicant is committing to achieving BREEAM Very Good.

- 4.1.24 At reserved matters further detail shall be required to demonstrate how the proposed development achieves the relevant local planning policies.
- 4.1.25 The applicant has committed to providing 100% of the electricity to the site using Renewable Energy Guarantees of Origin (REGO) tariffs. Although the electricity purchased is from renewable energy it is not considered to meet the planning policy target of at least 10% of energy requirements to be from renewable or low carbon technologies as the technologies are not provided as part of the proposed development. However, the

REGO tariffs are a welcome additional measure to further reduce the proposed development's impact on the environment.

Commentary on the Conclusions of the Assessment

- 4.1.26 As this is an outline application it is felt that the Sustainability Statement provides sufficient detail to demonstrate a commitment to meeting relevant planning policy at reserved matters stage. However, further detail will be required to support a reserved matters application.
- 4.1.27 Clarifications are provided below and additional recommendations are made in **Table 5.1**.

Summary of Clarifications Required
<p>30. Clarify whether the Sustainable Construction SPD or the Chiltern Core Strategy have been considered in the development of the Sustainability Statement.</p> <p>31. The consideration of the use of brownfield land has not been reviewed in the Sustainability Statement.</p> <p>32. Air quality and noise impacts are not discussed in the Sustainability Statement. Confirm that these are addressed in other supporting documents to the application.</p> <p>33. Transport impacts are not reviewed in this report and should be reviewed alongside CS4.</p> <p>34. It is expected that the applicant will use site features to maximise passive design measures. This should be explicitly detailed.</p>

4.2 Landscape Strategy Review

Landscape Design Approach

- 4.2.1 The landscape design approach set out in paragraph 1.0.2 should include landscape and visual integration as a key driver. **This is included as a clarification in the table below.**

Existing Landscape

- 4.2.2 Figure 1.1 should identify existing Public Rights of Way. **This is included as a clarification in the table below.**

Landscape Strategy

- 4.2.3 Section 1.2: Landscape Strategy refers to the Colne Valley Regional Park Action Plan. It should also refer to the objectives and opportunities identified in the Colne and Crane Green Infrastructure Strategy. **This is included as a clarification in the table below.**
- 4.2.4 The vision, strategy and landscape guidelines for the character areas in the published landscape character assessments (Iver Heath Mixed Use Terrace LCA and Iver Heath Terrace LCA) should also be identified, as appropriate.
- 4.2.5 Figure 1.3: Landscape Strategy Plan – more information should be provided on the constraints associated with the underground pipeline. **This is included as a clarification in the summary table below.**
- 4.2.6 Paragraph 1.2.3 identifies the key aims and objectives of the landscape strategy. The three key strands that are proposed to help deliver the strategy and to reflect the Colne Valley Regional Park Action Plan are identified in paragraph 1.2.4.

Illustrative Masterplans

- 4.2.7 The Illustrative Masterplans (Options 1 and 2) have been designed to help deliver the strategy but the Key Strand No. 1: 'An Enhanced Woodland Framework' has not been fully accommodated as woodland is quite limited in provision. Most of what is identified as woodland on the Illustrative Masterplans may be more properly regarded as lines of trees or narrow tree belts (typically only 10m wide). The northern and southern tree belts (Pages 9 and 12) would be dissected by roads. The northern tree belt is sandwiched between buildings, which will constrain tree growth in terms of shading and space for growth of large-scale trees.
- 4.2.8 The objectives for the new east-west green corridor across the centre of the site will be of limited effectiveness due to the narrow width of its western section and dissection of the corridor by a connecting road (Figure 1.18).
- 4.2.9 It would be more appropriate for the new alignment of the permissive footpath to be located within either the central or northern east-west green corridors so a connection may be made directly to the Black Park bridleway, rather than the footpath terminating at the site boundary. The proposed alignment of the permissive footpath through a car park would be relatively unattractive for those people who value walking through countryside.
- 4.2.10 The trees proposed on the 10m wide earth bund in the Black Park Green Link (Figure 1.11) are shown as having 2-3m wide canopies (Figure 1.31 and Figure 1.32) and would be small in scale. As such they would not be effective in enclosing views of the proposed 21.5m high buildings. The stated objective of screening views from the Public Right of Way within Black Park (paragraph 1.4.6) will be fulfilled to only a very limited degree).
- 4.2.11 There is sufficient space, subject to SUDS requirements, within the Pinewood Road Green Link to incorporate the 10m (minimum) belt of new tree/shrub planting. This would filter views of the proposed car parks and built form from Pinewood Road as intended, particularly during the winter months. The degree of hedgerow loss associated with the three proposed vehicular access points off Pinewood Road needs clarification. **This is included as a clarification in the table below.**
- 4.2.12 The landscape proposals for the Arrivals Area, Visitor Attraction Area, Car Parking Areas, and Green/Blue Infrastructure are all considered appropriate.

Summary of Clarifications Required
35. The Applicant should clarify whether the landscape design approach includes landscape and visual integration as a key driver.
36. Clarify whether Figure 1.1 includes Public Right of Way.
37. The Landscape Strategy should also refer to the objectives and opportunities identified in the Colne and Crane Green Infrastructure Strategy.
38. The Applicant should clarify the constraints associated with the underground pipeline.
39. The degree of hedgerow loss associated with the three proposed vehicular access points off Pinewood Road needs clarification.

5.0 SUMMARY OF MITIGATION MEASURES

- 5.1.1 The table below provides a comprehensive summary of all mitigation measures proposed by the Applicant across the topics that the Temple Team have been commissioned to review, both embedded and additional.
- 5.1.2 Buckinghamshire Council should ensure they secure the delivery of these mitigation measures by means of an appropriate approval, obligation, agreement and or condition.

Table 5.1 Summary of Mitigation Measures

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
LVIA	Pre-Construction	None	None
	Construction	<p>Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS5837:2005 Trees in relation to construction).</p> <p>Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS5837:2005 Trees in relation to construction).</p> <p>Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009);</p> <p>Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.</p>	None
	Operation	<p>Keeping building heights lower in proximity to visual receptors (residential receptors);</p> <p>Retaining all high and medium value trees with appropriate</p>	Consideration of the opportunity at Reserved Matters stage for creation/enhancement of an east-west pedestrian/cyclelink (as highlighted in the Colne and Crane Green Infrastructure Strategy)

		<p>root protection buffers where possible, as identified by the Arboricultural Impact Assessment (see Appendix 7.2);</p> <p>Where vegetation losses are unavoidable (e.g. at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;</p> <p>Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;</p> <p>Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points;</p> <p>Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;</p> <p>Within the green infrastructure buffer, and adjacent to Black Park where the PRow is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;</p> <p>Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/year);</p> <p>Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties.</p>	<p>east-west across the site, ideally linking with existing public footpaths along the eastern edge of Pinewood Road.</p> <p>Preparation of detailed landscape proposals at Reserved Matters stage to provide a robust framework of vegetation for landscape and visual integration purposes.</p> <p>Careful consideration at Reserved Matters stage of the colours and textures of building materials.</p> <p>Careful consideration at Reserved Matters stage of the treatments of signage, security fencing, lighting columns and other free-standing features along the site periphery.</p>
Climate Change	Pre-Construction	None	None

	Construction	Site Waste Management Plan and Construction Environmental Management Plan	None
	Operation	"Fabric first" approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2013; 100% low energy (LED) lighting; High efficiency gas boilers or low carbon heat pumps where heating is required; 10% of the site's energy delivered through low carbon renewable energy.	None
Air Quality	Pre-Construction	None	None
	Construction	None	Dust mitigation to be included in a Construction Environmental Management Plan (CEMP).
	Operation	None	None

Additional Recommended Measures

Compliance Review

The Applicant should provide worst-case scenario parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.

Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.

Landscape and Visual Impact Assessment

A Landscape and Ecological Management Plan should be prepared at the Reserved Matters stage.

Climate Change

Provide details of how mitigation measures can be further developed at later design stages, and monitored during construction and operation.

Air Quality

It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.

It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.

Sustainability Statement

A planning condition should be raised to ensure the development provides 10% of its energy requirements from renewable or low carbon sources.

A Materials and Waste Management Strategy is required to support the reserved matters application. It is recommended that the material use proposals within the whole life carbon assessment is considered as soon as possible to make the most meaningful impact.

A construction stage water management strategy is required to support the reserved matters application.

A Site Waste Management Plan is required to support the reserved matters application.A

Drainage Strategy is required to support the reserved matters application.

An Energy Strategy is required to support the reserved matters application.

An Overheating Report is recommended to support the reserved matters application.

Appendix B Final Review Report 001

Report



TEMPLE

LEADERS IN ENVIRONMENT,
PLANNING & SUSTAINABILITY.

Report for – Buckinghamshire Council
Screen Industries Global Growth Hub Partial ES, Compliance and Standalone
Document Review
Final Review Report 001Final



Document version control

Version	Date	Author	Reviewed by	Reviewed and approved by
1.0	20/01/2020	Various	Jessica Parnwell	Spencer McGawley

Report for: **Buckinghamshire Council**

Main contributors: **Various**

This report has been prepared by Temple Group Ltd with all reasonable care and diligence within the terms of the contract with the client. We disclaim any responsibility to the client and others in respect of any matters outside the scope of the contract. We accept no responsibility to third parties to whom this report, or any part, thereof is made available. Any such party relies upon the report at their own risk.

Contents

1.0	Introduction to the ES Addendum Review	1
2.0	Review of Submitted Potential Regulation 25 Requests	2
3.0	Summary of Mitigation Measures	19

Appendices

Appendix A	– Interim Review Report	24
------------	-------------------------	----

1.0 Introduction to the ES Addendum Review

- 1.1.1 The Temple Team carried out an independent review of Chapters 7, 10 and 11 of the Environmental Statement (ES) submitted in support of the planning application for Screen Industries Global Growth Hub (Application Reference: PL/20/3280/OA). The output of the review was an Interim Review Report (IRR) (**Appendix A**) submitted to Pinewood Group Limited (PGL), 'the Applicant' by Buckinghamshire Council.
- 1.1.2 In response to the IRR Turley, on behalf of the Applicant, submitted the 'Response to Temple Comment' document dated 11th December 2020.
- 1.1.3 A review of the specific responses to the individual IRR and potential Regulation 25 requests is presented within **Chapter 2** of this FRR.

2.0 Review of Submitted Potential Regulation 25 Requests

- 2.1.1 **Table 2.1** below provides a review of the response document submission in response to the request for potential 'further information' (under Regulation 25) in the November 2020 IRR.
- 2.1.2 Each potential 'further information' (under Regulation 25) request has been dealt with individually in **Table 2.1** and the Temple Team have stated whether the Applicant's response is deemed to be acceptable to close out the issue, or whether further clarification or information is required. If there are outstanding issues following the reassessment, a further round of review may be required.

Table 2.1 Assessment of Response to IRR within the 'Response to Temple Comment' document dated 11th December 2020.

Chapter IRR Ref No.	Request Type	Comment / Request IRR	Review Commentary	Review Conclusion Responses considered to be Acceptable (Green) or Unacceptable (Red)
Chapter 7: Landscape and Visual Ref: 1	Clarification	Justify the magnitude of change at Year 0 in terms of the large-scale of the proposed buildings and the value of the existing fields.	The open fields of the site are described in LVIA Para. 7.58 as "devoid of diversity or visual interest". However, the "undeveloped spaces/fields between areas of development" are identified in the Colne Valley Landscape Character Assessment (Iver Heath Terrace LCA) as being sensitive to change. The medium magnitude of change identified in the LVIA is considered appropriate, but the loss of openness should have been identified as a contributory factor in the assessment, though no further action is required.	Acceptable No further clarification is required.
Chapter 7: Landscape and Visual Ref: 2	Clarification	Identification of visual effects based on 'winter' views.	The worst-case winter views are relevant to all viewpoints assessments. There is only one reference to winter months/views visibility in the text (Para. 7.83). The difference in effect between winter and summer views should have been described in the LVIA, however, as the Applicant has confirmed that the magnitudes of change are applicable for the maximum case, no further action is required.	Acceptable No further clarification is required.
Chapter 7: Landscape and Visual Ref: 3	Clarification	Identification of hedgerow loss along Pinewood Road resulting from proposed junctions and vehicular sightlines.	The Applicant's response refers to three potential access locations as shown on the parameter plan (Figure 4.7) and has assumed that each access would result in the loss of no more than 20 m of hedgerow. This hedgerow loss for these three access locations (and an unknown number of additional service access points identified on the Figure 4.7 notes) should have been identified in the 'Assumptions' section at Para. 7.146. The visual assessment section at Paras. 7.116 to 7.117 refers to how car- parking/buildings would be seen through the new entrances, but reference should have been made to this wider loss of hedgerow and the resultant greater visibility of buildings. However, as the Applicant has identified the hedgerow loss, no further action is required.	Acceptable No further clarification is required.

Chapter 7: Landscape and Visual Ref: 4	Clarification	Amendments to photomontages to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	The green infrastructure parameter plan (Figure 4.6) identifies the location of a peripheral belt of multi-functional green infrastructure (GI), including new/enhanced landscape and ecology and a strengthened landscape frontage to Pinewood Road. It does not specify the quantum or extent of tree/shrub planting within this GI corridor and does not commit to provision of the woodland belts that have been modelled. The assessment should not rely on the establishment of woodland belts, which may or may not be found to be feasible at reserved matters stage. It is accepted that the photomontages cannot accurately identify the potential access locations but a note in the photomontage footer to flag up the requirement for these access points would have helped avoid any misunderstanding by the general public that the hedgerow would be left intact.	Unacceptable The Applicant should identify which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned.
Chapter 7: Landscape and Visual Ref: 5	Clarification	Revisions to the landscape and visual impact assessment to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	As noted in the Ref: 4 response above, the green infrastructure parameter (Figure 4.6) does not commit to the provision of woodland belts and hence there is no basis to assume a continuous 10-13m high woodland buffer in the Year 15 assessment. As per the response to IRR Ref 4, it would be useful if the Applicant could identify during the which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned. It is accepted that the Chapter 7 LVIA judgements include the assumption that accesses will be required. The reviewer is satisfied that the large magnitude of change identified for views from Pinewood Road at Year 0 would 'accommodate' the 20m length of hedgerow loss associated with each of the proposed junctions off Pinewood Road.	Unacceptable The Applicant should identify which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned.
Chapter 7: Landscape and Visual Ref: 6	Potential Regulation 25	Assess the likely effects based on the future baseline, with reference to the restoration plan for the minerals working site.	The Applicant states that the baseline has assumed the site is an area recently worked for minerals and is in the process with being restored which is consistent with the rest of the EIA. Consistency with the rest of the EIA is noted but it would have been helpful to have an additional assessment based on future baseline conditions (i.e., with the mineral workings fully restored/no longer a degraded landscape). However, no further action is required as the reviewer is satisfied that this will not alter the magnitude of visual change or significance of effect.	Acceptable This is acceptable and is not considered further information under the EIA Regulations.

Chapter 7: Landscape and Visual Ref: 7	Potential Regulation 25	Preparation of a local landscape character area to better inform identification of landscape effects.	The Applicant has provided a list of the key characteristic and sensitivities in the response document. The list is noted. Preparation of a local landscape character assessment is good practice and would have been helpful for the LVIA, however, as the Applicant has now provided this list, no further action is required.	Acceptable This is acceptable and is not considered further information under the EIA Regulations.
Chapter 7: Landscape and Visual Ref: 8	Potential Regulation 25	Provide justification as to the level of the effect in Year 15 with specific reference to the effectiveness of the woodland buffer in winter.	The Applicant has stated that the LVIA judgements take into account the fact that views of buildings will not be completely screened from the section of bridleway closest to the Site. The illustrative masterplan (DAS Figure 6.10) indicates a line of intermittent trees passing along the centre of this GI corridor/parallel to the western site boundary. This small number of trees will provide some intermittent filtering of views during the winter months at Year 15.	Unacceptable The Applicant should commit to providing a sufficiently wide woodland belt parallel to the western site boundary to ensure that there is a reduced level of visual effect in the winter of Year 15.
Chapter 7: Landscape and Visual Ref: 9	Potential Regulation 25	The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of significant effect falls from Year 0 to Year 15 should also be provided.	The Applicant has stated that the reduction in effects is largely a consequence of the maturing vegetation; however, as previously stated, it is not clear whether woodland planting is proposed.	Unacceptable The Applicant should identify which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned and to ensure effects are reduced.
Chapter 10: Climate Change Ref: 10	Clarification	Clarify if there are any other local policies relevant to climate change.	The Applicant confirms that there are other Policies, however this was not intended as an exhaustive list and the aim was to provide a short review of relevant climate change related Policies to provide an element of context insofar as they have informed the assessment. This is acceptable, although it is important to understand the relevant local policy requirements as this can have a bearing on the acceptability of particular impacts.	Acceptable No further clarification is required.
Chapter 10: Climate Change Ref: 11	Clarification	Have the operational energy figures been obtained from benchmarked data from other schemes or from the scheme's Energy Strategy?	The Applicant confirms that benchmark figures used in the preparation of the Sustainability Statement and the chapter are the same, but the chapter utilises long term emissions factors to provide a more accurate long-term view of the development's emissions. It is agreed that the use of long-term emissions factors is considered appropriate.	Acceptable No further clarification is required.

Chapter 10: Climate Change Ref: 12	Clarification	Clarify the proposed operational design life for the scheme and clarify whether the assessment is of 28 or 30 years.	The assessment has been carried out over the period from 2022 – 2050, the noted cumulative 30-year period is therefore incorrect, and it is 28 years. The assessment period of 2022- 2050 has been used to reflect the UKs zero carbon target. This does not have a bearing on the conclusions of the assessment.	Acceptable No further clarification is required.
Chapter 10: Climate Change Ref: 13	Clarification	Clarify what data the process emissions are based on.	The Applicant confirms that Process Emissions are “ <i>the use of fuel or purchased electricity in a process (e.g., the manufacture of materials used in construction)</i> ”, taken from the RICS factors on embodied carbon.	Acceptable No further clarification is required.
Chapter 10: Climate Change Ref: 14	Clarification	Provide more details as to how carbon will be reduced and monitored in later design and construction stages.	The Applicant confirms that during the design phase an assessment will be carried out of the embodied carbon of new buildings to identified potential materials and measures to reduce the embodied carbon of the Proposed Scheme (para 10.51), which is expected to be required by a suitable Planning Condition.	Acceptable No further clarification is required, subject to the inclusion of the planning condition.
Chapter 10: Climate Change Ref: 15	Potential Regulation 25	Provide a more systematic assessment of climate change adaptation and resilience impacts, in alignment with the June 2020 IEMA Guidance.	<p>The Applicant states that IEMA Climate Change Resilience and Adaptation guidance is referenced and was used in the preparation of the ES chapter.</p> <p>Having discussed with the Applicant, it is agreed that the assessment should be proportionate to the risks from climate change, and consideration has been appropriately given to how climate change may potentially impact cumulatively with effects in other chapters as part of the design stage discussions.</p> <p>The cross-cutting mitigation set out in the chapter provides evidence of measures incorporated into the design of the Proposed Scheme to demonstrate its resilience.</p> <p>Although the Reviewer is comfortable that the key climate resilience and in-combination risks have been considered within the design, for future reference it would have been helpful to clearly set out all of the steps taken from the guidance, including how future climate risks would be monitored and managed. No further action is required.</p>	Acceptable This is acceptable and is not considered further information under the EIA Regulations.
Chapter 10: Climate Change Ref: 16	Potential Regulation 25	Provide an estimate of GHG emissions associated with the transportation of c. 2 million visitors and associated servicing of the	<p>Excluding operational activities such as mains water consumption, wastewater treatment, and the transport and treatment of waste is considered acceptable, as stated in the initial review.</p> <p>With regards to the emissions associated with transport, the Applicant states that this “<i>cannot be carried out accurately as</i></p>	Unacceptable The nature of the scheme is such that the visitors are likely to make specific trips and thus cause net

		scheme, and update overall residual effects accordingly.	<p><i>there is no way of determining which of the potential c.2 million trips are new, i.e., they are additional to those already on the network</i>", and points to Paragraph 10.90 of the chapter relating to increased use of electric vehicles and other low carbon initiatives for freight transport.</p> <p>Whilst the IEMA GHG assessment guidance acknowledges that qualitative assessments are acceptable where data is unavailable, it is considered that reasonable assumptions could be readily applied to give a reasonable worst-case assessment. The nature of the Proposed Scheme is such, that it is likely that trips are made specifically to visit it and a sensible trip origin and vehicle type could be applied in the absence of anything more detailed from the Transport Assessment (which would be surprising if this is not available).</p> <p>Not being able to accurately estimate emissions is not the same as not including a very broad assessment with clearly stated assumptions. Therefore, it is considered that, notwithstanding the above points, a critical source of GHG emissions has been excluded from the magnitude set out in Tables 10.13-10.15 and the assessment is not acceptable.</p>	additional trips. Broad assumptions can be made to provide a reasonable worst-case assessment.
Chapter 10: Climate Change Ref: 17	Potential Regulation 25	The residual construction phase effect is greater than the threshold for medium magnitude impact at the SBDC scale, which is inconsistent with the low category stated and avoids stating a significant effect.	<p>The Applicant reiterates that Paragraph 10.33 states there are no published criteria to determine impact magnitude, and it is agreed that the IEMA Guidance also supports the use of professional judgement.</p> <p>However, the thresholds provided must be for a reason to allow transparency of the assessment, so that the reader has a point of reference to understand the determination of the results.</p> <p>It is recognised that the benchmarked RICS factors used in the embodied carbon assessment are often demonstrated by LCA to be overstated and therefore this is considered as suitable justification as to why being only 0.07% (not 0.7% as the Applicant states in their response) beyond the threshold in this case can apply a lower magnitude.</p> <p>That said, the combined emissions in Table 10.16, whilst excluding a reasonable worst-case inclusion of operational traffic, still comes to 3.31%, and in conjunction with the comments in Ref: 16, is likely to be an even higher percentage above the threshold and therefore avoids stating a significant effect. This is accounted</p>	<p>Acceptable</p> <p>This is acceptable and is not considered further information under the EIA Regulations.</p>

			for under the Reviewer's response to Ref: 16, and the acceptability of this response only relates to the construction phase.	
Chapter 10: Climate Change Ref: 18	Potential Regulation 25	State the significance of the cumulative effects.	The Applicant notes that GHG emissions are inherently cumulative as they contribute to a global impact and the assessment of cumulative schemes would require a GHG assessment for each cumulative scheme which is not considered proportionate or practical, and the Applicant has no control over emissions outside of the Proposed Scheme. This is considered acceptable.	Acceptable This is acceptable and is not considered further information under the EIA Regulations.
Chapter 10: Climate Change Ref: 19	Potential Regulation 25	The Applicant should further justify why operational mitigation measures are not proposed.	The Applicant states that as there is no significant effect concluded from operational emissions, no further measures are proposed to ameliorate a significant effect. Although in response to Ref: 16, operational traffic is inappropriately excluded from the emissions inventory, and may trigger a significant effect, this Potential Regulation 25 point relates to non-transport operational mitigation. It is clarified that additional detail on operational carbon reduction measures will be considered as part of future Reserved Matters Applications, and these are included in the Sustainability Statement which accompanies the Application. This is considered acceptable.	Acceptable This is acceptable and is not considered further information under the EIA Regulations.
Chapter 10: Climate Change Ref: 20	Potential Regulation 25	Update the NTS to reflect the comments and include all significant effects and a description of climate change adaptation/resilience.	The Applicant states that the NTS already concludes that effects would not be significant, taken from the assessment conclusion. In light of their responses, it is not considered the NTS required updating. The Reviewer is still concerned about the exclusion of a reasonable worst-case assessment of operational traffic, as set out in the review of Ref: 16. Inclusion of emissions from c. 2 million net additional annual trips from wherever they might arise is expected to lead to an increase in the overall emissions well above the 3% magnitude threshold identified in the assessment, and therefore trigger a significant effect which should be identified in the NTS.	Unacceptable The inclusion of a reasonable emissions from operational traffic is likely to exceed the thresholds for a significant effect.
Chapter 11: Air Quality Ref: 21	Clarification	There is no reference to the National Planning Policy Framework and Planning Practice	The Applicant has advised that although the NPPF and PPG were not referenced within the Chapter they were followed, and their omission would not alter the conclusions of the assessment.	Acceptable No further clarification is required.

		Guidance which should both be included within the Chapter.		
Chapter 11: Air Quality Ref: 22	Clarification	Clarify whether consultation on the scope and methodology of the assessment was undertaken and if it was this information should be included within the Chapter.	The Applicant has clarified that consultation was not undertaken and therefore no updates are required.	Acceptable No further clarification is required.
Chapter 11: Air Quality Ref: 23	Clarification	Paragraph 11.10 states that the <i>'effects of dust and particulate matter emissions on nearby residential receptors are unlikely to be considered significant and will not be considered within the ES'</i> and then states that a construction dust assessment is included in Appendix 11.2. The effects of construction dust have therefore been considered within the ES and Paragraph 11.10 should be amended accordingly to avoid confusion.	The Applicant acknowledges that this could be worded better however the conclusions of the construction dust assessment would remain the same. Whilst this approach may confuse the readers, the outcome of the assessment remains the same.	Acceptable No further clarification is required.
Chapter 11: Air Quality Ref: 24	Clarification	An explanation should be provided within the assessment as to why Slough has been assessed and clarification is required as to whether roads between the two study areas are affected (i.e., meet the EPUK/IAQM screening criteria). If these roads are affected and there is relevant public exposure, then they should be included within the assessment.	Clarification has been provided that roads between the two study areas were not assessed as they are not affected by the Proposed Development i.e., traffic generated by the Development does not meet the EPUK/IAQM screening criteria requiring a detailed assessment. Updates to the assessment text to include this clarification are not proposed.	Acceptable This information should have been provided within the assessment however no further clarification is required.
Chapter 11: Air Quality Ref: 25	Clarification	The Applicant should include PM10 monitored concentrations within the baseline assessment.	PM10 concentrations have been included in the baseline assessment for Slough, however PM10 and PM2.5 are not monitored in South Bucks.	Acceptable No further clarification is required.

Chapter 11: Air Quality Ref: 26	Clarification	Clarification is required as to whether PM2.5 is monitored by Slough Borough Council. The Applicant should include PM2.5 monitored concentrations within the baseline assessment if data are available.	Clarification has been provided that PM2.5 monitoring is not undertaken South Bucks. It is monitored in Slough but data from these sites has not been included as the monitoring sites were not deemed to be representative of the Development Site. PM2.5 concentrations are low at all three monitoring sites. Inclusion of data would not alter the conclusions of the baseline section.	Acceptable This information should have been provided within the assessment however no further clarification is required.
Chapter 11: Air Quality Ref: 27	Clarification	Clarification is required as to whether the building onsite adjacent to Pinewood Road will be demolished as demolition activities are not included in the dust risk assessment. If demolition activities are planned the dust risk assessment will need to be revised.	Clarification has been provided that no demolition activities will occur onsite therefore no updates are required.	Acceptable No further clarification is required.
Chapter 11: Air Quality Ref: 28	Clarification	Figure A11.1 needs to be updated to show distance bands to Pleasant Cottage Guest House, Pinewood Manor & Goosebarry Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings.	<p>The Applicant has advised that distance bands were generated from the boundary of the Site which provides a worst-case assessment and therefore no updates are required.</p> <p>Drawing distance bands from the site boundary for construction dust assessments is acceptable however the distance bands in Figure A11.1 have not been drawn correctly around the southern end of the site and need to be updated.</p>	Unacceptable Figure A11.1 needs to be updated so that distance bands around the southern end of the site are correct.
Chapter 11: Air Quality Ref: 29	Clarification	Clarification is required within the assessment as to which roads experience a decrease in traffic flows during the construction phase and why.	<p>Clarification is provided that the Sevenhills roundabout development leads to the reduction in flow for a small number of links as traffic is rerouted to/from the Site. The decrease occurs on:</p> <ul style="list-style-type: none"> • Small section of Pinewood Road between Pinewood West and Pinewood Green. • Pinewood Green • Church road • Denham road 	Acceptable This information should have been provided within the assessment however no further clarification is required.
Chapter 11: Air Quality	Clarification	Full results from the 'Further Assessment' Do Minimum +SHR scenario outlined in paragraph	Results have been provided in 'Appendix 1' of the Applicant's response document.	Acceptable This information should have been provided within the assessment however no

Ref: 30		11.100 are not provided and should be included within Appendix 11.		further clarification is required.
Chapter 11: Air Quality Ref: 31	Clarification	Paragraph 11.120 should be amended to remove 'magnitude of change' which is not relevant to the assessment.	The Applicant has advised that ' <i>this change of wording would not alter the conclusions of the assessment as such this change is not required</i> '	Acceptable No further clarification is required.
Chapter 11: Air Quality Ref: 32	Clarification	Residual effects are discussed in paragraphs 11.88 to 11.90, however as no mitigation is proposed this text should be amended to avoid confusion and readers should be referred to the conclusions in paragraph 11.85.	The Applicant has advised that ' <i>This follows the requirements of ES assessment, and would not alter the conclusion of the assessment, as such this change is not required</i> '.	Acceptable Although paragraphs 11.88 and 11.90 may cause confusion the outcome of the assessment is not affected, and no further clarification is required.
Chapter 11: Air Quality Ref: 33	Clarification	The proposed construction dust mitigation measures outlined in Appendix 11.2 are adequate, however they need to be crossed referenced in the 'Secondary Mitigation or Enhancement' section of Chapter 11.	The Applicant has advised that ' <i>This change of wording would not alter the conclusions of the assessment as such this change is not required</i> '.	Acceptable Paragraph 11.65 states that construction dust mitigation measures outlined in Table 11.11 in Appendix 11.2 are tertiary mitigation measures.
Chapter 11: Air Quality Ref: 34	Clarification	The NTS should include result of the construction dust assessment.	The Applicant has advised that construction dust mitigation measures which are an integral part of the Proposed Scheme would ensure that there is no significant effect from construction dust and therefore it was not assessed within the ES and this change is not required to the ES chapter or NTS.	Acceptable It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.
Chapter 11: Air Quality Ref: 35	Potential Regulation 25	The dispersion model should be updated to include all roads likely to affect pollutant concentrations within 200 m of sensitive receptors. The model should be rerun, and pollutant concentrations reassessed.	The Applicant has advised that ' <i>air quality modelling was constrained by data availability and COVID-19 resulting in no further traffic surveys from those completed in 2019, as detailed in the chapters limitation. The receptors were placed as far as possible from the missing links to ensure that the effects were limited as it is understood that concentrations decrease with distance from road source. This could lead to a slight reduction in</i>	Acceptable This information should have been provided within the assessment. This is acceptable and is not considered further

			<p><i>the possible total concentrations, however by using worst case backgrounds from 2020 with no future improve it is considered that the assessment is reliable, and the conclusion could remain as determined by the assessment.'</i></p> <p>Further information was provided on how missing road links may affect predicted concentrations at specific receptor locations (around Pinewood, Wellington Street Roundabout, William Street Junction, Farnham Road Junction and Church Street Junction) with reference to receptor distance from the missing link/s, the Defra NO₂ fall off with distance calculator and IAQM/EPUK guidance. It was found that impacts predicted in the ES at some receptor locations (E42, E46, E47, E48 and E50) are slightly under worst case however this would not alter the conclusion of the chapter.</p>	information under the EIA Regulations.
Chapter 11: Air Quality Ref: 36	Potential Regulation 25	The Applicant should redo model verification for the Slough study area to only include monitoring sites where all roads likely to affect pollutant concentrations within 200m of the site are modelled, and to exclude kerbside monitoring sites (unless kerbside sites are relevant for exposure).	Clarification was provided that three diffusion tubes were included in the verification that are classified as kerbside, however distances between the kerbside and the monitoring sites were provided which indicate that they are representative of roadside rather than kerbside locations (they are all > 1 m from the road). Therefore, updates to the assessment are not required.	<p>Acceptable</p> <p>This is acceptable and is not considered further information under the EIA Regulations.</p>
Chapter 11: Air Quality Ref: 37	Potential Regulation 25	The Applicant should review all sensitive receptors modelled to ensure that they are representative of worst-case public exposure and model pollutant concentrations at additional receptors if worst case exposure has not been assessed.	The Applicant reviewed all modelled sensitive receptors and confirmed that in Pinewood worst case sensitive receptors were considered. In Slough, the model is limited by traffic data availability as detailed in response to Ref 35. However, the headroom in concentrations predicted at those receptors already included in the model suggests that the conclusions of the assessment would remain the same. As such it is not considered that further receptors need to be included.	<p>Acceptable</p> <p>This is acceptable and is not considered further information under the EIA Regulations.</p>
Chapter 11: Air Quality	Potential Regulation 25	The Applicant should review all junctions and roundabouts modelled to ensure that all road links (and slip roads) at	The Applicant cross referenced the response to Ref 35.	<p>Acceptable</p> <p>This is acceptable and is not considered further</p>

Ref: 38		roundabouts and junctions are included in the model and that roundabout and junction layouts within the model are correct. The model should be rerun, and pollutant concentrations reassessed.		information under the EIA Regulations.
ES Compliance Ref: 39	Clarification (Concerns)	Figure 4.10 (PP7 Development numbers and yield) specifies area of the site as 32.6ha and specifies maximum area covered by parameter elements. However, there is no figure by hectare provided for Education and Business Hubs. It is unclear if this is within the parameters of the production studio or additional, as the land uses do not sum to the figures of 32.6ha. Clarification is required as to the area (hectares) of the Education and Business Hubs in addition to floorspace stated	<p>The Applicant confirms that the education and business hubs are not defined by size in hectares as this is dependent upon 'other design considerations such as the number of floors. It is accepted by this FRR that the maximum parameters for education and business floorspace as a whole are identified (both qualitatively and on supporting illustrations the location of where the 2 options for land use sits within the site) and whilst further information beyond the 'jelly mould' parameter would be helpful the basis for the assessments are nonetheless sound.</p> <p>The concerns regarding sum of area are explained by rounding of decimal places with further explanation provided with regard to area of 'secondary green infrastructure' not included within the PP4 Green Infrastructure or building zone figures. As the assessment has considered the worst-case parameter without these secondary green infrastructure the assessment is sound.</p>	<p>Acceptable</p> <p>No further clarification is required.</p>
ES Compliance Ref: 40	Clarification (Concerns)	Green Infrastructure parameter s stated as "no less than 9.8ha" (Table 4.1). However, Figure 4.10 specifies Green Infrastructure as 10.3ha. Further information is required to confirm correct parameters for green infrastructure.	The Applicant confirms that the lower figure is the basis for minimum parameters for the assessment of biodiversity net gain, whilst the higher figure represents the intended total figure for green infrastructure including splays at point of access. This FRR concurs that the use of the lower figure within the assessments for BNG represents a worst-case scenario.	<p>Acceptable</p> <p>No further clarification is required.</p>
ES Compliance Ref: 41	Clarification (Concerns)	In addition, Biodiversity Net Gain of "at least 10%" is specified. It should be noted that in terms of Biodiversity Net Gain it is more complex than simple area coverage of green infrastructure, with connectivity, nature, and quality of habitat of primary	The Applicant confirms agreement with this statement and reiterates this is acknowledged within the ES.	<p>Acceptable</p> <p>No further clarification is required.</p>

		importance to achieving percentage.		
ES Compliance Ref: 42	Clarification (Concerns)	Whilst the notes in Figure 4.10 specify Black Park Buffer and Amenity Buffer 'up to 30m wide' no minimum parameter width is stated in the parameter table. Reference is made within paragraph 4.20 to a 25m buffer and " <i>along points of access, the green infrastructure boundary will be narrowed</i> " The parameter plans should make clear the minimum buffer width as well as the maximum to highlight the range.	The IRR response confirms that any reduction to the buffer width below 25m would be limited to accommodate visibility at access point splays. This FRR concurs that parameter plans specify 25m and 30m buffers.	Acceptable No further clarification is required.
ES Compliance Ref: 43	Clarification (Concerns)	Reference is made to minimum and maximum numbers of buildings within the visitor attraction and education and business hubs; however, no figure is provided for the production studios. Clarification is required as to whether minimum/maximum number of buildings are fixed as a parameter as not specified on plans/figures submitted.	The IRR response confirms that no figure is provided for production studio building number, and that as a reserved matter will be determined in agreement with the LPA at reserved matters stage. This FRR agrees that the outline maximum parameters in terms of building height and massing have been assessed by the 'jelly mould', presenting a worst case. The provision of Appendix 2 to present the DAS illustrative layout is useful and no further information is sought.	Acceptable No further clarification is required.
ES Compliance Ref: 44	Clarification (Concerns)	The ES states that the construction programme and phasing is not known at this time but " <i>could be built out over approximately 2 years...it may occur over a greater number of years, earliest practicable completion has been used within the EIA to establish a basis for assessments and sensible/worst case</i> " (paragraph 4.37) It should be noted that for some assessments a shorter	The Applicant provides clarification of the approach to the construction timescale, confirming the assessment is based upon peak construction period and that the timescale is a reasonable scenario.	Acceptable This FRR accepts the clarification however BC should ensure through conditions at detailed planning that any material changes to the construction timescale are considered for impacts upon the assessments conducted in the ES.

		timeframe results in less significant 'temporary' construction effects. The assessments should reflect the uncertainty as to the programme and phasing and reflect the worst-case scenarios if these are based on a longer than 2-year construction timeframe.		
ES Compliance Ref: 45	Clarification (Concerns)	The Applicant has scoped out consideration of waste as unlikely to have significant effects, however Schedule 4(1) of the EIA Regulations require that the ES should provide within the description of the proposals an estimate of the anticipated waste generated for both construction and operation phases. Whilst accepted that this is an outline application, and a waste strategy will be prepared at Reserved Matters stage; the Applicant should provide worst case parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.	The Applicant has provided additional information as Appendix 3 to the IRR Response including a reasonable estimate of volume of construction waste by element of proposed outline scheme (Table 1) and estimated indication of volume/weight of operational waste based on Pinewood West and East waste arisings (Appendix 3 paragraph 12 and 13).	Acceptable This is acceptable and is not considered further information under the EIA Regulations.
ES Compliance Ref: 46	Clarification (Concerns)	Schedule 4(4) The Applicant undertook an internal scoping process with topics scoped into the assessment as likely to be significantly affected clearly identified within the ES. The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the	The Applicant provides additional information on the extent of the remaining mineral reserves confirming mineral extraction has been undertaken to its maximum extent at the site.	Acceptable No further clarification is required.

		<p>scoping out from further consideration within the EIA process the following topics:</p> <ul style="list-style-type: none"> • Agricultural land (soils) • Archaeology (cultural heritage) • Built heritage (cultural heritage) • Water resources, Flood Risk and Drainage (water) • Lighting (population, human health and biodiversity) • Risk or Major Accidents and/or disasters • Materials and Waste • Ground conditions and contamination (soil) <p>The rationale for scoping out of agricultural land, references previous soil quality on the site prior to mineral extraction activities, with no assessment of soil quality on the site (still under restoration) provided. Buckinghamshire Council may have additional information on the quality or importance of agricultural soils on the site following the required restoration of the quarry activities to agricultural use. However, in principle the rationale appears sound.</p> <p>In relation to material assets no reference is made within the ES to the potential for further mineral reserves on or in proximity to the site. Buckinghamshire Council should satisfy themselves that any development does not lead to</p>		
--	--	---	--	--

		sterilisation of unworked mineral reserves within the site boundary or in close proximity.		
Sustainability Statement Ref: 47	Clarification	Clarify whether the Sustainable Construction SPD or the Chiltern Core Strategy have been considered in the development of the Sustainability Statement.	The Applicant has acknowledged that the Sustainable Construction SPD or the Chiltern Core Strategy have not been included in their review but have addressed the issues raised in both documents. The one outstanding issue relating to brownfieldland is discussed in Ref 48.	Acceptable No further clarification is required.
Sustainability Statement Ref: 48	Clarification	The consideration of the use of brownfield land has not been reviewed in the Sustainability Statement.	The previous site use has been clarified as brownfield land.	Acceptable No further clarification is required.
Sustainability Statement Ref: 49	Clarification	Air quality and noise impacts are not discussed in the Sustainability Statement. Confirm that these are addressed in other supporting documents to the application.	Air quality and noise impacts have been reviewed separately by specialists.	Acceptable No further clarification is required.
Sustainability Statement Ref: 50	Clarification	Transport impacts are not reviewed in this report and should be reviewed alongside CS4.	Transport impacts have been reviewed separately by specialists and the summary included in the Sustainability Statement.	Acceptable No further clarification is required.
Sustainability Statement Ref: 51	Clarification	It is expected that the applicant will use site features to maximise passive design measures. This should be explicitly detailed.	Acknowledging that this is an outline application, the applicant has made reference to their intention to implement passive design features. It is expected that this will be explicitly detailed at reserved matters stage.	Acceptable No further clarification is required.
Landscape Strategy Ref: 52	Clarification	The Applicant should clarify whether the landscape design approach includes landscape and visual integration as a key driver.	The Applicant has highlighted that the Landscape Strategy been informed by separate landscape and visual and ecological appraisals (Para 1.2.1) and that the creation of an appropriate setting and framing of the new buildings is a key driver (para 1.0.2).	Acceptable No further clarification is required.
Landscape Strategy Ref: 53	Clarification	Clarify whether Figure 1.1 includes Public Right of Way.	The Applicant notes that Figure 1.1 does not include the Public Right of Way; however, as this is shown on Figure 1.3, no further action is required.	Acceptable No further clarification is required.

Landscape Strategy Ref: 54	Clarification	The Landscape Strategy should also refer to the objectives and opportunities identified in the Colne and Crane Green Infrastructure Strategy.	The Applicant states that these are provided in the Planning Statement. The reviewer is content that this has been adequately addressed.	Acceptable No further clarification is required.
Landscape Strategy Ref: 55	Clarification	The Applicant should clarify the constraints associated with the underground pipeline.	The Applicant has identified the easements of the pipeline in their response and states that appropriate approvals will be sought at the appropriate juncture. Whilst this would have been helpful to include within the ES, no further action is required.	Acceptable No further clarification is required.
Landscape Strategy Ref: 56	Clarification	The degree of hedgerow loss associated with the three proposed vehicular access points off Pinewood Road needs clarification.	The Applicant has identified that each access would result in loss of no more than 20m of hedgerow, as advised by the highways consultants. This is considered acceptable.	Acceptable No further clarification is required.

3.0 Summary of Mitigation Measures

3.1.1 **Table 3.1** below provides a summary of mitigation measures proposed by the Applicant across, the topics that the Temple Team have been commissioned to review, both embedded and additional as captured in the IRR.

Table 3.1: Summary of Mitigation Measures

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
LVIA	Pre-Construction	None	None
	Construction	<p>Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS5837:2005 Trees in relation to construction).</p> <p>Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS5837:2005 Trees in relation to construction).</p> <p>Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009).</p> <p>Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.</p>	None
	Operation	<p>Keeping building heights lower in proximity to visual receptors (residential receptors).</p> <p>Retaining all high and medium value trees with appropriate root protection buffers where possible, as identified by the Arboricultural Impact</p>	<p>Consideration of the opportunity at Reserved Matters stage for creation/enhancement of an east-west pedestrian/cyclelink (as highlighted in the Colne and Crane Green Infrastructure Strategy) east-west across the site, ideally linking with existing public</p>

		<p>Assessment (see Appendix 7.2);</p> <p>Where vegetation losses are unavoidable (e.g., at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;</p> <p>Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;</p> <p>Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points;</p> <p>Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;</p> <p>Within the green infrastructure buffer, and adjacent to Black Park where the PRoW is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;</p> <p>Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/year);</p> <p>Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties.</p>	<p>footpaths along the eastern edge of Pinewood Road.</p> <p>Preparation of detailed landscape proposals at Reserved Matters stage to provide a robust framework of vegetation for landscape and visual integration purposes.</p> <p>Careful consideration at Reserved Matters stage of the colours and textures of building materials.</p> <p>Careful consideration at Reserved Matters stage of the treatments of signage, security fencing, lighting columns and other free-standing features along the site periphery.</p>
Climate Change	Pre-Construction	None	None
	Construction	Site Waste Management Plan and Construction Environmental Management Plan	None

	Operation	<p>"Fabric first" approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2013;</p> <p>100% low energy (LED) lighting;</p> <p>High efficiency gas boilers or low carbon heat pumps where heating is required;</p> <p>10% of the site's energy delivered through low carbon renewable energy.</p>	None
Air Quality	Pre-Construction	None	None
	Construction	None	Dust mitigation to be included in a Construction Environmental Management Plan (CEMP).
	Operation	None	None

Additional Recommended Measures

Compliance Review

The Applicant should provide worst-case scenario parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.

Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.

Landscape and Visual Impact Assessment

A Landscape and Ecological Management Plan should be prepared at the Reserved Matters stage.

Climate Change

Provide details of how mitigation measures can be further developed at later design stages and monitored during construction and operation.

Air Quality

It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.

It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.

Sustainability Statement

A planning condition should be raised to ensure the development provides 10% of its energy requirements from renewable or low carbon sources.

A Materials and Waste Management Strategy is required to support the reserved matters application. It is recommended that the material use proposals within the whole life carbon assessment is considered as soon as possible to make the most meaningful impact.

A construction stage water management strategy is required to support the reserved matters application. A

Site Waste Management Plan is required to support the reserved matters application.

A Drainage Strategy is required to support the reserved matters application.

An Energy Strategy is required to support the reserved matters application.

An Overheating Report is recommended to support the reserved matters application.

Additional Recommended Measures
<p>Require appropriate monitoring to demonstrate that the CLP is ensuring that effects from construction traffic are negligible.</p> <p>Electric Charging Points should be provided in line with parking policy.</p> <p><u>Noise and Vibration</u></p> <p>Consideration of the acoustic impacts of overheating mitigation strategy for summer cooling.</p> <p><u>Greenhouse Gases and Climate Change</u></p> <p>GHGs to be more accurately quantified to allow appropriate targets to be set and monitored throughout the construction phase. A commitment to monitor GHG's emissions during the construction period should be included.</p> <p>Production and periodic review of a Climate Change Adaptation Plan to formally account for the risks identified in the assessment.</p> <p><u>Wind</u></p> <p>Subject to clarification by the Applicant, additional shelter for location 232 on the Block A roof terrace on two adjacent sides of the seating area. The shelter could be composed of dense planting or hedge at least 1.5m in height or hard screening at least 1.5m in height and no more than 50% porosity.</p>

Amenity Societies/Residents Associations

Iver Heath Residents Association

(24.11.21)

Firstly, we note that the revised description does not now specify the split between “education” and “business.” Previously this was 50/50 between the two in terms of the area of 50,000 sq.ft. We, therefore, question the rationale for and significance of this change and would wish to point out that all consultation and 3rd party representations to date have been based on the former.

Turning now to the Environmental Statement Addendum and associated documents (ESAs) we note that these run to some 23 documents. Otherwise, the applicant has submitted a summary of and responses to representations – a further 9-10 documents – for better ‘lay’ understanding which the applicant advises “do not change any of the applicant’s proposals”.

Notwithstanding these general observations, we consider the requirement to submit responses by 26th November (recently extended, we believe, to 30th) unrealistic to enable IHRA and other stakeholders with legitimate interest to evaluate the new technical substance of the information, once separated from the applicant’s commentary upon it.

That said, in terms of the technical content of the ESAs, we note that further evaluation by Temple Consultants (TC) has not been uploaded. TC has previously raised “concerns” regarding the technical content of the application. These included the methodology adopted for modelling air quality impacts. For example, amongst other Regulation 25 requests for information (items 26-29, P20 in their report). In fact, in that report TC advised that the AQ modelling should be re-done. As such:

a. Has it been re-done?

b. Does it overcome TC's concerns?

It is a legitimate interest of our members and the wider community to understand at this stage and prior to preparation of your report, that the R25 was fulfilled and that such critical and fundamental technical flaws, as identified, have been addressed in each instance.

Pending further notification of the submission of such amended reports and documentation, we assert that the objections and concerns as previously set out by our letters dated 29 October 2020 and, on our behalf, by Bell Cornwell, have not been addressed by the ESAs and associated reports of which we have been notified.

Otherwise, we would additionally wish to associate ourselves closely with the comments made by The Gardens Trust – particularly in respect of the absence of a Heritage Impact Statement – dated 12 November 2021, as well as those made by The Ivers Parish Council and Colne Valley Regional Park.

In conclusion, we also wish to reiterate here our objection to this application whilst we acknowledge the social, economic, and historic contribution made by Pinewood Studios in South Bucks.

In the simplest terms, this proposal is not suited to this location and the case for “very special circumstances” cannot be fairly applied; that critical transport management, highways, environmental and ecological matters “of concern” raised by Buckinghamshire Council’s (BC) appointed consultants have not, yet, been addressed even at this late stage in the process.

These are not, therefore, matters that should be reserved for further applications or applied conditions.

As such we urge that this application should either be refused because of the identified technical shortcomings or withdrawn by the applicant.

IHRA for its part would welcome the opportunity to participate in a wider master planning exercise for Iver Heath led by Buckinghamshire Council, The Ivers Parish Council and Pinewood Studios Group as well as other local landowners with full and meaningful engagement of residents, the wider community and stakeholders delivered via a series of co-designed site-specific Development Briefs and a Neighbourhood Development Order.

Finally, in terms of “mitigation” should BC be minded to approve this application we acknowledge, with reservations, the measures tabled via the Wexham and Ivers Community Board to which we would wish to add the following:

Local Wildlife Recovery – contribution towards a 10-year project to preserve and enhance the remaining natural landscape and eco-system services in Iver Heath and the wider Colne Valley.

Creation of a fund, to be administered by a newly created Community Land Trust, for purposes of the co-design and delivery of a project providing in parallel to ecological recovery and new ‘green infrastructure’: long term local education, training, recreational, health and economic benefits from that project. We envisage a contribution not less than £1m per annum over that 10-year period. Otherwise, in terms of planning conditions, we consider it essential that the highways works

to Five Points Roundabout (FPR) and Sevenhills Road (SHR) be required via S106 and S278 undertakings and the subject of pre-commencement conditions. The reason for this being that extent and duration of the works as envisaged by this application could not be delivered with minimised environmental and health impacts upon the day-to-day lives of residents without their prior construction.

(22.12.2020)

On behalf of our client, Iver Heath Residents Association, we write to set out our objections to the current application at Pinewood Studios (application reference PL/20/3280/OA). This is an outline planning application with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq. ft (70,000 sq. m) comprising:

- A visitor attraction of 350,000 sq. ft comprising a series of buildings
- 350,000 sq. ft of film production buildings (including sound stages, workshops, offices and an external film backlot)
- An education hub (25,000 sq. ft)
- A business growth hub (25,000 sq. ft)
- Together with associated parking and servicing plus Green Infrastructure

Our objection covers a number of categories and we have had regard to the technical information which accompanies the application. This includes the Planning Statement, the Transport Assessment, the Environmental Statement and the Development Framework Design and Access Statement.

Planning Policy

The applicant's assessment of the legislative basis for the determination of the planning application is incomplete. They state, at para 7.1 of the planning statement that:

"The legislative basis for decision making is Section 70(2) of the Town and Country Planning Act 1990 which requires a local planning authority in determining a planning application to have regard to the development plan insofar as it is relevant and other considerations that are material and Section 38(6) of the Act".

However, they do not quote Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise". (emphasis added).

The NPPF summarises this at the beginning of the document stating, in para 2 that

"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise."

The applicant seeks to diminish the importance of the development plan as the starting point for decision making. The development plan for the area, particularly with regard to the Green Belt, remains consistent with national policy and should therefore be given full weight. Overall Impact of the Proposal on Local Residents

We start by making an overarching and general objection – which is the overall impact of such a considerable proposal on local residents. The starting point is that the development is contrary to policy

– it is outside any settlement and therefore lies in the countryside. The site is also within the Green Belt. We have not provided a technical response on every issue but have restricted ourselves to the key planning issues – however, it is evident that an application of this scale will have impacts such as noise, air pollution, traffic generation, increased activity levels which will fundamentally impact on residential amenity and quality of life in the vicinity of this proposal. The construction of the site would continue for a number of years – resulting in additional disturbance to residents. Green Belt Impact

The NPPF (2019) para 133 confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Para 143 sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

A number of Green Belt assessments were carried out to support the preparation of the Chiltern and South Bucks Local Plan (which was withdrawn earlier in 2020). The Strategic Level Green Belt study from 2018 describes the existing Pinewood Studio Development as being a ‘contained employment use’. The extent of the Green Belt in this general location is seen as having a strong role in preventing the merging of settlements. None of the independent Green Belt studies (which were all carried out in recent years and should therefore be considered up to date in terms of accurately reflecting the position on the ground) recommend this area for release from the Green Belt.

Developing here can only be described as urban sprawl which would result in the merging of the existing Pinewood studios site with the residential development to the south of the Uxbridge Road. Additionally, Pinewood Road was seen as a defensible boundary to the Green Belt in this location through the Chiltern and South Bucks Local Plan.

The proposal would conflict with the first three purposes of the Green Belt. There is a difference between the independent assessments carried out to inform the Chiltern and South Bucks Local Plan and the applicant’s assessment.

a) To check the unrestricted sprawl of large built-up areas;

The applicant does not consider that this application would result in ‘sprawl’ despite the proposal covering 32 hectares of the Green Belt.

The argument is confused, stating, at para 8.12 of the planning statement that as the proposal is justified by exception it will not represent unrestricted sprawl. However – this is not the correct assessment which is the contribution that the site makes to the five purposes of the Green Belt. Very special circumstances are not relevant to this assessment.

Our assessment is that the proposal would (in any considered assessment) clearly result in a sprawl of development which would fill in what is effectively a gap between the existing

extent of the Pinewood studios site and the Uxbridge Road, with residential development to the south of this.

b) To prevent neighbouring towns from merging into one another

The applicant's assessment is that the proposed development will not result 'in the merging of towns in any physical sense'. However, it will certainly be a significant development covering 32 hectares of what are basically fields. The proposal would diminish the gap between existing development.

c) To assist in safeguarding the countryside from encroachment

The development of 32 hectares of Green Belt would have a significant impact in terms of physical encroachment into the Green Belt. The applicant accepts that there is harm to this Green Belt purpose.

Para 144 of the NPPF states that local planning authorities should ensure that 'substantial weight' is given to any harm to the Green Belt when determining planning applications. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal, is clearly outweighed by other considerations. This is the key planning judgement when considering this application in terms of the Green Belt assessment. Para 145 of the NPPF explains that the construction of new buildings is inappropriate in the Green Belt – setting out a number of exceptions (which are not relevant to this application).

Therefore, the development is correctly defined as inappropriate development in the Green Belt which would be harmful (this is accepted by the applicant within the planning statement) therefore the judgement is whether or not the applicant has demonstrated very special circumstances that would justify this inappropriate development.

The applicant also provides an analysis of the use of land within the Green Belt, as part of their justification for the proposal. This focuses on para 141 of the NPPF which states that: "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land". (emphasis added).

This is clearly envisaged as a planning role for a local authority to pursue – this would be taken forward through a Local Plan. This is confirmed by the Planning Practice Guidance which accompanies the NPPF.

It is incongruous for the applicant to seek to justify (as set out in para 8.38 of the planning statement) that this scale of development with the consequent impact on openness would assist a local authority in implementing this part of national policy by providing green infrastructure and net biodiversity gains.

Very Special Circumstances

The applicant analyses very special circumstances within section 8 of their planning statement, setting out a number of matters which they consider constitute the very special circumstances to outweigh the presumption in national and development plan policy against inappropriate development in the Green Belt.

Very special circumstances have to be carefully considered on a case by case basis. The assessment of these is a planning judgement by the decision maker.

Firstly, we do not consider that there is a locationally specific justification – there are other Pinewood Studios and ‘Screen Hub UK’ could be located elsewhere as co-location is unnecessary. A location could easily be chosen which is not in a sensitive Green Belt location. We understand that at a recent meeting Pinewood declared that there would be no access to the Studio facilities from the ScreenHub and vice versa. This supports the case that there is no requirement at all to build the Screen Hub on this particular piece of adjacent land - it can in fact be built anywhere.

We note the comments regarding the implementation of the Government/LEP approved Industrial Strategy, however, do not see any specific reference to Pinewood Studios within the Government documentation. The references in the Buckinghamshire specific LEP strategy refer to the current businesses and approved expansion plans at Pinewood.

We do not accept that these strategies constitute very special circumstances which justify inappropriate development in the Green Belt. There is no reference within them of a requirement for further expansion into the Green Belt in the area of Pinewood. These are strategies rather than policy – and any land use implications of them should be taken forward, if necessary and appropriate, through the development plan rather than via speculative planning applications. This would allow any proposed allocation to be properly justified through the plan-led process, which is underpinned by evidence and subject to public consultation and independent Examination by an Inspector.

Any identified requirement for the Pinewood site to be expanded further should therefore be considered through the future Buckinghamshire Local Plan – which is the correct mechanism to consider any changes to the Green Belt boundaries in this location.

Whilst we accept that there would be economic benefits arising from the proposal – this does not justify the development in this sensitive Green Belt location. We note that Buckinghamshire Council has previously referred to the Green Belt as a justification for opposing speculative development (Council meeting October 2020) with regard to the withdrawal of the Chiltern and South Bucks Local Plan). The decisions of the Council must be made on a consistent basis. If the Green Belt is to be cited as a justification for not meeting the housing needs of the Chiltern and South Bucks area of the County then it would be inconsistent to not apply this assessment to this application.

The applicant also sets out that there will be considerable environmental benefits of the proposal, largely resulting from additional planting. Whilst these may be benefits of the proposal – they cannot be seen as outweighing the harm to the Green Belt – or the harm from other elements of the proposal such as traffic, which we discuss below.

Traffic

We also wish to object to the application due to the additional traffic that would be generated by the proposal. The proposed development will add considerable pressure to the local road network through trip generation which is assumed as between 5,000 and 8,500 visitors per day and 3,500 employees. The network in the vicinity of the site is already congested. The Transport Assessment (TA) that has been submitted with the application shows that a number of the key junctions in proximity to the site are already operating over their maximum capacity.

The applicant proposes to implement a 'robust sustainable transport strategy' but we consider that the assumptions made regarding sustainable travel are unrealistic. The expectation is that only 50% of visitors will be arriving by car within five years. This is highly unlikely and does cast doubt on the assumptions within the TA. It remains probable that the majority of visitors will choose to travel to the site by car. Whilst the TA states that there are a number of railway stations close to the site, none of these are within easy walking distance and would require additional bus trips to get to the site.

Additionally, it is considered highly improbable that anyone would even try to reach the site on foot from any of the surrounding train stations because they are some miles away, the roads from those stations to the site do not all have pedestrian pathways and there would be no realistic and safe way to do this journey other than in a vehicle.

Car parking is a reserved matter but we note that the spaces which are currently proposed within the TA do not seem sufficient for the forecast visitor/staff numbers which will inevitably lead to pressure to park on local roads.

Traffic policy as set out in the NPPF (para 109) states that

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual impacts on the road network would be severe".

We assume that the highways authority will be making a thorough assessment of the highways implications and whether or not the assumptions within the TA are realistic and reasonable.

Heritage

The site lies in close proximity to a number of designated heritage assets. These include the following:

- Little Coppice which is a Grade II Listed Building
- Langley Park which is a Grade II Registered Park and Garden with associated Listed Building
- Heatherden Hall and associated structures including Lodge, Gates, Gate Piers and Ornamental Garden Structures (Grade II Listed Building).
- St Margaret's Church, Iver. Grade II Listed Building.

The applicant has stated that there will not be any heritage impact and to our knowledge has not supplied a heritage impact assessment with the application, which we consider an omission.

We disagree with this applicant's assessment, stating that there is no heritage impact, which we do not consider is properly balanced and is a significant omission which needs to be remedied before the application can be determined. We support the comments of the Council's heritage officer in this regard.

Given the proximity of the heritage assets (particularly Little Coppice and Heatherden Hall), there will undoubtedly be an impact which needs to be properly assessed and considered through the determination of this application. The relevant paragraph of the NPPF (2019) is 196 which states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use". Environmental Impact

We also wish to object due to the impact of the proposal on Black Park and the Colne Valley Regional Park.

We note that the permissive path from Iver Heath and Black Park would be lost and a new one provided and understand that the existing route is well used (and that usage has increased in the current pandemic). The proposed replacement path does not appear to be in an attractive location (and for example goes through a car park). We therefore support the comments made by the Colne Valley Park Community Interest Company in this regard.

The impact on Black Park itself would be considerable – the applicant describes the impact of buildings up to 21.5 metres high close to the east of Black Park as 'not significant'. This is another example of the applicant seeking to understate the considerable impacts of the proposals. Of course buildings of this scale – plus the disturbance from the associated activity levels, would be highly significant and detrimental to the Park.

Additionally, we are concerned that within the Environmental Statement which accompanies the application, the implications of the development on the ecology of the site and the surrounding area have again been described as 'negligible'. We hope that these conclusions are thoroughly examined by the Council's ecology team.

We also support the comments from the Environment Agency which make it evident that the application is deficient in information as the proposed development is not compatible with the Environmental Permits for landfill, waste treatment and mining waste which are currently active and held by the site.

The Environment Agency also make the valid point that the Environmental Statement does not include a land contamination chapter and we agree that this is completely unacceptable given the former use of the site as landfill. New pathways could be created by any development which would allow contamination to enter the wider environment, having wider ranging impacts on ecology.

We hope that these comments are helpful. Please do not hesitate to contact the writer if you need any further information.

(29.10.2020)

These comments are made on behalf of our members and residents that have asked us to represent their views at this stage.

As such IHRA is unable to support this proposal for the following reasons:

1. A potential technical non-compliance by the Buckinghamshire Council with Statutory Instrument 2015 No. 595, The Town and Country Planning (Development Management Procedure) (England) Order 2015, Part 3, S5(2). Therefore, there might be insufficient detail to enable either the LPA nor consultees nor parties with a legitimate interest to properly assess the application as required. Further that:

2. The application should not be considered separately from reserved matters because the application is for a Major Application and, as such, Buckinghamshire Council as the LPA should require the applicant to withdraw and resubmit the application following consultation with stakeholders and the local community.

3. Notwithstanding the above, the detailed concerns regarding the development proposals include

those set out by BREEAM New Construction Manual Headings:

- Management
- Health & Wellbeing
- Energy
- Transport
- Water
- Materials
- Waste
- Land Use & Ecology
- Pollution
- Innovation

In particular that 'Very Good' is an insufficient target for a UK Global Screen Hub of international reputation and ambition. The LPA should be seeking a far higher standard of sustainability to offset the negative environmental impacts of this development. 'Excellent' should therefore be set as the minimum and verifiable standard for Major Projects of global significance with 'outstanding' achieved for certain categories such as Energy, Land Use and Ecology.

4. That, at the very least, in the absence of a withdrawal of the application by the applicant, an extension of the statutory determination period should be agreed with the applicant to ensure that the outcome of any Judicial Review concerning Application No. PL/19/4430/FA [Sevenhills Road and part of Southlands and Pinewoods Road, to the North East of Pinewood Studios...] can be properly taken into account. The latter which may be sought as this application did not take into account nor refer to, so far as we can see, the impact of the latter application.

5. Highways matters: we are concerned that the scope and content of the Traffic Impact Assessment undertaken has not properly assessed impacts upon the immediate and wider road network and used insufficient receptors as part of the studies undertaken. We would ask therefore that BC subjects this work to independent technical scrutiny.

6. Environmental Impact Assessment: we are not satisfied that the EIS as submitted satisfies statutory requirements including, for example, Paragraph 2, Schedule 4 of the EIA Regulations and the absence of any (d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.

We would ask therefore that a Scoping Report in this respect is undertaken by an independent expert.

7. Chapter 5 of the EIS is inadequate in this respect as presented, in one instance completely misrepresenting the relevant section of the regulations. This brings into question the integrity of the entire document. As such the LPA should apply Regulation 25 of the 2017 EIA regulations. In such instances, a developer must provide that "further information" before a final decision can be made.

8. As far as the Impact on the semi-rural environment of Iwer Heath is concerned, we would wish to entirely endorse the objections and concerns raised by the CPRE as set out in their letter to you dated 18-10-20.

9. As far as the impact on the Colne Valley Park is concerned, we would wish to entirely endorse the objections and concerns raised by the Colne Valley Park CIC as submitted to you.

10. It does not seem that direct and indirect Climate Change Impacts have been assessed. For example, the Strategic Economic Case supporting this application is founded in large part upon The Buckinghamshire Local Industrial Strategy. We note, however, that there is scant reference in this document to any Environmental Impacts. Strategic Policy such as this, prepared with the involvement of DCMS, we would expect be required to meet the same standard as National Government departmental policy in this respect.

11. Former Draft Local Plan Policy DMEP4 anticipated no expansion of Pinewood Studios outside the allocated plan area to adjacent Green Belt land as follows:

6.9 Enterprising - Pinewood Studios

6.9.1 Pinewood Studios is a film and television studio complex of international importance which makes a significant contribution to the UK film industry and the national economy. The Council will support film studio and media use on the site.

Policy DM EP4

Enterprising – Pinewood Studios

Planning permission will be granted for extensions, new buildings and conversions within the Pinewood Studios site provided that it can be demonstrated that the proposals are for uses directly connected with film production or associated media industries and would not cause unacceptable transport or environmental impacts or effects.

12. In relation to the emerging Iwers Neighbourhood Plan, IHRA is promoting the adoption of the following draft Policy regarding Pinewood Studios:

TINP PS01 (Draft)

1.0 Pinewood Studios

1.2 Pinewood Studios is a film and television studio complex of international importance which makes a significant contribution to the UK film industry and the national economy. The Parish Council supports film studio and media use on the existing site.

1.3 Planning permission should be granted for extensions, new buildings and conversions within the Pinewood Studios site provided that it can be demonstrated that the proposals are for uses directly connected with film production or associated media industries and would not cause unacceptable transport or environmental impacts or effects.

1.4 The Pinewood Studios site is shown on the Policies Map.

Given the technical and management concerns raised, we would urge Buckinghamshire Council to require the applicant to withdraw this application and be urged to undertake a comprehensive and meaningful consultation with all stakeholders ahead of any resubmission and enter into a Planning Performance Agreement.

Otherwise we are seeking that this application be refused.

In the event that the application is successful we would support calls for a Judicial Review through the Superior Courts.

Colne Valley Regional Park

(26.11.21)

We have reviewed the various documents and adjustments to the application and maintain our strong objections to this proposed development in the Green Belt. We refer to our objections submitted in October 2020 and February 2021.

We note that whilst there are important details considered in the revised information and plans (for example, environmental impact, air quality, biodiversity net gain, bats and reptiles, waste disposal, traffic volumes and sustainable construction) these are secondary to the fundamental issues of principle concerned with this inappropriate application.

It is necessary for the Colne Valley Regional Park and the Council to focus on the 'big picture' issues – about what this latest large development proposal means for the Green Belt at Pinewood and generally around the Ivers area. We consider that none of the additional information or adjustments to the application change those considerations, and are minor in relation to the colossal scale of this proposal.

They do not lessen the impact or significantly improve the mitigation package in any substantial way.

The fact remains that the site will be dominated by extensive urban development and the overall effect will be to greatly urbanise this part of Iver/ Iver Heath and the countryside setting of those villages and Black Park.

The argument being advanced is that those Green Belt considerations are offset by the 'very special circumstances' advanced by the applicant. However, those circumstances must be considered in the context of:

- The changes and additional development that have already been put forward (and accepted at appeal) around Pinewood Studios

- The sensitivity and fragility of the Green Belt in this locality
- The massive scale of the development and how it will draw an enormous number of people and activity into the Green Belt – both visitors and workers and their attendant needs for accommodation, traffic movements, the associated negative impact on air quality and the urbanising effect of all this on a valuable area of Green Belt
- Of great importance in considering this application is that the fundamental aim of Green Belt policy is “to prevent urban sprawl by keeping land permanently open”
- The fact that this major proposal and its consideration is all taking place outside of the development plan – the medium by which a more strategic view should be taken on the future of the Green Belt

The changed information on green infrastructure and building heights make no material difference to the overall impact this huge development has on the openness of the Green Belt – a development of some 750,000 sq feet of buildings, more than 2,300 car spaces and buildings as high as a multi-storey car park or a seven-storey block of flats.

If the Council attaches great weight to the status and importance of the Green Belt in this area it must:

- Make a stand against this huge development and recognise the strategic importance of keeping the openness of the Green Belt here
- Bring a stop to the creeping urbanisation that threatens to overwhelm the area
- See that the circumstances being put forward are not sufficiently ‘special’ in the context of the area and the history of expansion at Pinewood.

We believe strong co-ordination and planning for the future of the Green Belt is needed so its openness is maintained and the open land can serve its role as a green resource for public health and wellbeing, and for environmental enhancement.

A strategic vision of what is happening in this section of the Green Belt is needed.

We stand by our original, strong, objections to this development, which in summary are:

- Conflict with Green Belt policy
- Harm to the rural environment and countryside character through significant urbanisation (both directly from this development and the future pressures it will bring for more development and urbanisation)
- The inadequate provision for comprehensive and high quality walking and cycling routes in the locality and the failure to bring forward appropriate re-provision of the ‘Peace Path’.
- Generally that the mitigation package¹ on offer fails miserably to mitigate and compensate for the strategic adverse impact on the Green Belt and Colne Valley Regional Park (not just individual factors that may be assessed through the EIA). This is a key issue in the planning balance.

Addenda

Note about the Peace Path

By way of example the agents’ claim that “the new Peace Path should be considered as an improvement and a benefit”. This is without reasonable foundation. We note the comment

by Temple Group (for BCC) that “The proposed alignment of the permissive footpath through a car park would be relatively unattractive for those people who value walking through countryside.” The ‘replacement’ path proposed in the application takes a circuitous route around a huge car park which will not represent walking through countryside or anything close to it. The replacement path location is also significantly worse in terms of its connectivity for residents of Iver Heath to reach Black Park and it does not connect better into the rights of way network.

Note about the public consultation process

Whilst our objections relate to the development itself we also express concern at a public consultation process that has only in the last few months released publicly reports by the Temple Group that appear to date from January and November 2020. As part of preparing this response we note that new information and plans have been submitted by the agent during November 2021 including a “Screen Hub UK ‘A new Peace Path – above and beyond for better access More accessible and attractive’ (November 2021)”. Is further public consultation to be undertaken on this additional material?

Turley criticism of CVRP objections

The applicant’s agent criticises the CVRP’s objections to this development in part because the CVRP has not undertaken the planning balance, weighing the benefits and case in favour of the development (eg economic growth and jobs) against the adverse impacts (particularly on the Green Belt and its openness). This ‘balancing’ role rests with the decision maker on the application, not the applicant or third parties. The judgment of the CVRP is that the protection of the Green Belt in this area is of paramount importance and that, as a general principle, it is a consequence of having the Green Belt that jobs and economic growth should be directed to other locations. '

(04.02.2021)

Supplementary Objection from Colne Valley Regional Park (CVRP) with regard to proposed development on [33] Hectares of land south of Pinewood Studios, Pinewood Road, Iver Heath, Bucks

Application ref: PL/20/3280/OA

Part 1: Introduction

1. In October 2020, the CVRP lodged an objection to the above application because of its serious concern over the adverse impact on the Regional Park and the conflict with planning policy, in particular the Green Belt (GB).
2. In December 2020, the agents for the applicants issued a “Response to consultation submissions by the Colne Valley Park Community Interest Company (and others)”. This was dismissive of the concerns raised by the CVRP and, in summary, considered that the submitted application adequately addressed the matters we raised, including its provision for mitigation.
3. The CVRP disagrees with that response and considers that various key aspects are being brushed over by the agents, including:
 - The strategic planning context
 - The extent of the harm arising from the scheme and

- The scale of mitigation that should accompany the development if the very special circumstances' (VSC) were to be accepted by the decision maker (whether the Council or Secretary of State).
4. The CVRP has engaged an independent chartered Town Planning Consultant to clarify and expand on its concerns to counter the Turley Associates' response dated December 2020.
 5. This document therefore supplements our October 2020 objection and is to be read alongside it.

Part 2: Strategic Planning Context to this part of the Metropolitan Green Belt and the CVRP's position in relation to it

6. This section highlights crucially important planning considerations to the proposed development. They are rooted in the National Planning Policy Framework (NPPF) and Development Plan (DP) policies, and are relevant to an assessment of how the development performs against the long established five purposes of the Green Belt. The beneficial side of the Green Belt and the CVRP's role in it
7. Once GBs are defined, NPPF Para 141 calls on local planning authorities to "plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."
8. The CVRP was established in 1965 with the support of a consortium of Local Authorities (including the predecessors of Buckinghamshire Council) to protect and improve this part of the Metropolitan GB, so partly fulfilling the Council's role as set out in Para 141. The CVRP's six objectives (set out in full in our October 2020 objection and included in Annex 1 here) mirror Para 141 – how proposed developments 'perform' against those objectives is a highly relevant consideration.
9. It is now well established that the natural environment and recreation opportunities provided by the Green Belt offer a critical physical and mental health resource for the wider population, as well as being a resource for wildlife. Its protection and enhancement for the long term is fundamental to the role of the CVRP. Once that resource is lost to development, it is lost forever. This flags the importance of there being a scale of mitigation proportionate to that of the development and the harm flowing from it, something we explore in Section 3 below.

The particular sensitivity of this part of the Metropolitan Green Belt

10. The tests for assessing the potential acceptability of 'inappropriate' development in the GB may be the same wherever its location, but the spatial context of the part of GB the site is located in must also be factored into decision-making. It should also inform the nature of mitigation if development is to be countenanced.
11. The application site is situated next to the sub-regionally significant Black Park, but is also close to the edge of the main London urban area. It is in a particularly sensitive and vulnerable part of the Green Belt. In the strategic Green Belt review undertaken by Arup and published by former South Bucks and Chiltern District Councils in 2018, this zone was categorised as part of the coherent 'London Fringe' zone. The report highlighted the characteristics and sensitivities of the part of that zone around the application site, referring to:

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

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

“...these gaps are essential in protecting the merging of the major urban settlements of Greater London and Slough (and the smaller settlements of Iwer and Richings Park)

...”

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

12. It is no coincidence that the extent of the CVRP sits within with the ‘London Fringe’ zone in Buckinghamshire – an area that needs particularly careful attention and planning. The Park is an important area of countryside to the west of London.
13. To promote that careful attention and planning, the CVRP CIC collaborated with a number of other organisations, including the relevant local authorities, to produce the Colne and Crane Green Infrastructure Strategy during 2019. It provides useful guidance in how to best to address the many challenges threatening the area, and is intended to be used alongside – and to inform – Development Plans as well as to “ ... inform both the design of development proposals and their comprehensive mitigation and planning obligations.” It can be found here: <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>

Scale of land-take is relevant

14. This is not some small extension to an existing developed site, but a 33 hectare (82-acre) expansion which follows an even larger recent one by the same company, now currently under construction.
15. This is a substantial tract contiguous with other substantial areas of open land – a key factor in why it was designated as GB and CVRP. The analysis undertaken by the applicant’s agents underplays the role the site plays in this wider context.
16. It is an area that should be protected from urbanisation, substantial building forms and intensification of traffic movements. Instead, it should be promoted for agricultural/ other appropriate rural land uses, and people’s enjoyment of the countryside.

Planning for large scale change in the Green Belt, as now proposed, and the Development Plan

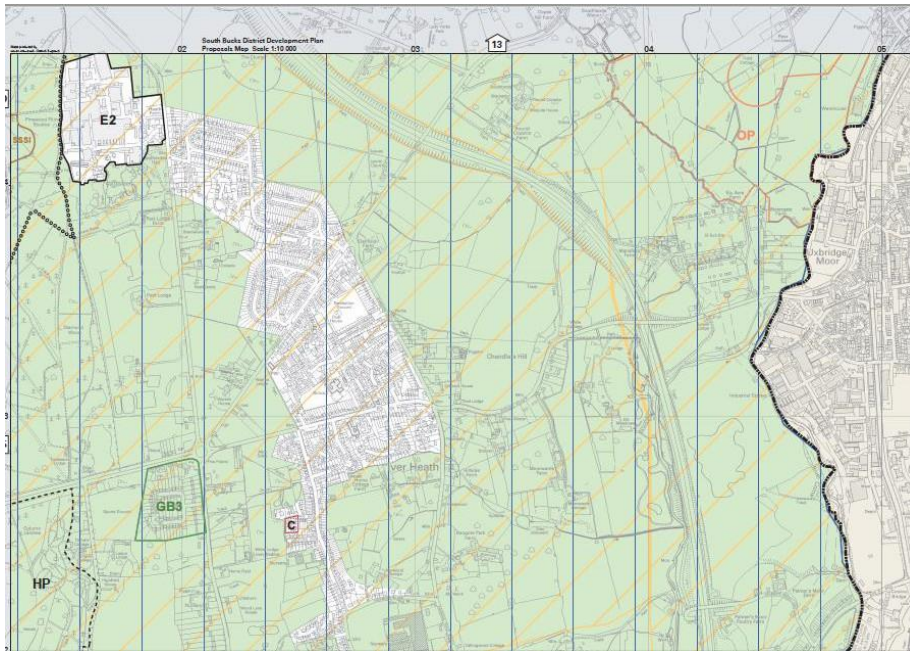
17. The normal and proper place for deciding whether major development should take place within the GB is the Development (or Local) Plan.
18. It is noted that the former South Bucks DC submitted a DP for Examination in 2019, which made no provision for this proposed expansion of Pinewood Studios. This DP was only withdrawn by the current Council from Examination in late 2020, due to concerns expressed by the Inspectors, principally around the ‘Duty to Co-operate’.
19. This is not to suggest that a planning application cannot be submitted outside that process and decided on the ‘VSC’ test, but equally it would not render irrelevant aspects of government policy for the GB that would need to be considered were a development of this scale and nature proposed in a DP.
20. In Turley's December 2020 response, para 2.29, it says that NPPF para 138 was written with changing GB boundaries in Development Plans in mind and dismiss it as a consideration. Whilst it may be correct to relate this NPPF paragraph to changing GB

boundaries in DPs, Turley's approach is too narrow on how to manage change in the Green Belt.

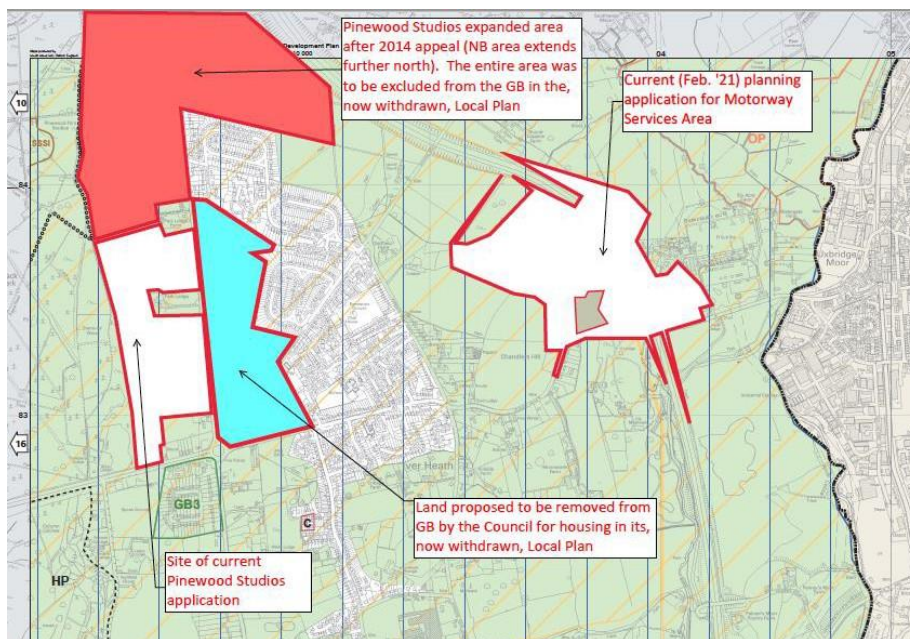
21. We consider that when such a large development is proposed (and one that is in addition to the expansion approved in 2014), the implications for the Development Plan (DP) must also be taken into account. It has not been put forward as a temporary development and, if approved and implemented, a corollary would be the removal of the site from the GB in a later DP review. This is normal practice and was destined to occur in the South Bucks and Chiltern LP to 2036 (until its recent withdrawal), in relation to the expanded Pinewood Studios to the north following approval by the Secretary of State in 2014.
22. NPPF Para, 138 includes the following (our underlining):
"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well- served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."
23. We argue that if the decision maker in this case is minded to accept the VSC for such a strategically significant development, it is incumbent on them to consider how to foster the beneficial role of the (remaining) GB as part of offsetting the harm associated with the development. NPPF para 138 provides a framework for that in a manner consistent with the positive approach to existing Green Belts by local planning authorities, called for by government NPPF para. 141 – see paras 7-9 above.
24. Notwithstanding that view, if the application is approved we are in no doubt that national and local planning policy requires a wide approach to mitigation to offset the harmful impact and conflict with GB policy caused by the sheer scale and hugely intrusive nature of this proposed development.
25. The CVRP plays a critical role in promoting the beneficial use of the GB in this area, and would wish to be formally party to mitigation proposals should permission ultimately be granted.
26. Good planning must prevail: it would be inconceivable for key issues relating to the beneficial future of the GB and CVRP to be overlooked when an ad hoc planning application for such a major development is submitted.

The need for a strategic view as to what is happening to this part of the Green Belt

27. Map 1 below shows the current extent of the Green Belt (from the 2011 Adopted Local Plan) whilst Map 2 shows the approximate extent of demands being placed on it.
28. It will be noted that all areas in Map 1 are within the GB except Iver Heath village, the 'established' Pinewood Studios site, and the Hillingdon urban area (also outside the Plan and LA area).
29. From that base, the CVRP is conscious the 'demands ' being placed on the GB in this immediate part of the Regional Park are individually, but also cumulatively, very significant. Each 'development' has a case advanced with it for why it needs to happen in the GB. Those needs are inevitably connected with the location being near to London and its actual or perceived economic 'pull'. Unless government policy is reversed – and there is currently no prospect of that happening – the Green Belt remains a core tool of the country's planning system.



Map 1: Extract from 2011 Adopted Local (Green Belt in green – CVRP in orange cross-hatch)



Map 2: Adopted Plan overlain with 'development' land in Iwer Heath area

30. There is a point at which it is necessary to stand back, see what is going on, and take a strategic view. That point has now been reached.

31. In terms of an immediate and 'local' strategic view, the demands on the GB and CVRP shown in Map 2 comprise:

- The current proposal for Pinewood expansion
- The Pinewood expansion allowed at appeal in 2014 (an area also proposed for removal from
- the GB in the Council's DP withdrawn from Examination a few months ago)
- A current (Feb 2021) application for a Motorway Service Area on the M25 at Iwer Heath

- A large area proposed for removal from the GB to allow for future housing in the Council DP, now withdrawn from examination.
32. The current application must be seen for what it is part of. We recognise that with different proposals at different stages of the planning process it is challenging to make a cumulative impact assessment. But the Council must rise to that challenge, be proactive and implement a positive vision for the future of this increasingly threatened part of the GB, even if it is through its handling of individual applications, rather than through a DP. For the reasons we highlight above, it is an area of the GB that must not be whittled away via ad hoc decisions, only for the authorities to subsequently look back and realise what has actually happened.
 33. With each significant incremental step to develop land in the GB we argue that the harm caused to it increases with each step. This is not only because of the unique large size and impact of the proposal individually, but also because it should be assessed as part of a cumulative change and deterioration to the GB from the GB baseline when it was designated. There is a point at which a part of the GB becomes so urbanised, compared with the baseline, that its integrity becomes seriously compromised. We see that the Iver Heath area is at that turning point, even if only assessed in the context of the current proposed expansion in conjunction with that approved in 2014.
 34. The decision maker will scrutinise the claimed VSC. This should include assessing the degree to which they are truly 'Very Special' circumstances when arguments become repeated ones.
 35. Against this backdrop and the relevant planning policies and guidance, we now clarify the specific and extensive harm arising from the development, focusing on the impact on the Green Belt and Colne Valley Regional Park, and its general sustainability in transport terms.

Part 3: Harm, in particular to the Green Belt (with link to CVRP objectives given in italics)

Aspects of Harm <i>(with link to CVRP objectives in italics)</i>	Examples of the Harm and comment
<p>A. Additional sprawl of the built-up areas at Pinewood and the nearby settlement of Iver Heath will occur.</p> <p><i>See CVRP Objective 2 under 'C' below</i></p>	<p>As is clear from Map 2 above there will be significant 'sprawl', both as a development on its own, but also when seen in the context of existing 'sprawl' from the settlement of Iver Heath (excluded from the GB) and the extent of the enlarged Pinewood Studios.</p> <p>We highlight in paras 32-39 above the wider planning context and cumulative impact on the GB to be considered. This increases the change and harm to the GB, which becomes proportionately greater with each significant addition.</p>
<p>B. The development will represent a significant step towards the merging of towns</p> <p><i>See CVRP Objective 2 under 'C' below</i></p>	<p>The application site lies approximately half-way between the edge of London (Uxbridge) and Slough, two large urban areas. Iver Heath and the existing Pinewood Studios (under expansion) already represent an urban break in the GB. This effectively reduces the 'green' space between the 'towns' and development of this site brings their merger markedly closer.</p> <p>The GB is intended specifically to prevent this kind of urbanisation.</p>
<p>C. There will be significant encroachment of the countryside</p> <p><i>Objective 2: To safeguard existing areas of countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design</i></p>	<p>The size of the development will mean a significant area of countryside to the west of Pinewood Road will be lost. This is of greater importance and concern because of the already approved expansion at Pinewood Studios, now under way.</p> <p>The location next to Black Park, a sub-regionally significant countryside resource, makes this encroachment all the more sensitive.</p> <p>Additional traffic movements associated with the development and road works necessary to accommodate it will be extensive – a major encroachment on already fragile countryside ultimately leading to its greater urbanisation.</p>
<p>D. The proposal fails to assist urban regeneration and the recycling of derelict and other urban land</p>	<p>The Council/ decision maker will judge the 'need' for the development, and whether alternative sites could adequately meet it. However, it appears to the CVRP that because of the sheer extent of the harm, at least a significant part of the scheme (the visitor attraction) should be seen as 'footloose' capable of being located in an existing urban area where regeneration will be a benefit, and where accessibility by non-car modes of transport could be maximised.</p>
<p>E. Failure to promote the beneficial use of the GB</p> <p><i>Objective 1: To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</i></p> <p><i>Objective 4: To provide opportunities for</i></p>	<p>We see nothing that materially promotes the beneficial use of the Green Belt/ CVRP, and nothing that addresses the CVRP's objectives. We highlight the:</p> <ul style="list-style-type: none"> - Loss of Peace Path, a long established and very well used route - The proposed replacement will be inconvenient for users from the Pinewood Green area who would be required to take a long diversion along an already busy road (and one yet busier in future) - Walkers and cyclists seeking to reach Black Park would have to pass through a new urban expanse – a huge car park and large buildings. This routing completely fails to protect and enhance Black Park and its environs.

<p><i>countryside recreation and ensure that facilities are accessible to all.</i></p> <p><i>Objective 5: To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.</i></p> <p><i>Objective 6: To encourage community participation, including volunteering and environmental education. To promote the health and social well-being of benefits that access to high quality green spaces brings.</i></p>	<ul style="list-style-type: none"> - Further severance of already poor links to Black Park along the A412, resulting from the new access proposed and dramatically increased traffic associated with it - No improvements for visitors, especially by active travel modes to Black Park, Langley Park or other nearby locations in the GB - The extent of development, combined with the enlarged Studios complex, will represent a barrier block of building preventing active travel permeability for this area of countryside in the long term - A more urbanised context detracting from the setting of nearby designated heritage assets - Future agricultural use of the site will be prevented. The proposed development would not form part of the rural economy and is inappropriate for a rural location. Please reference Annex 2 which expands on the positive role of agriculture. - All in all not the enhanced countryside experience that should be a feature if this development is to proceed <p>Security issues are claimed as a reason against permeability but, in view of the importance of GB and CVRP considerations, the scheme should be designed so that attractive active travel routes across the site become integral to the layout design, and security matters dealt with in a sympathetic manner.</p> <p>The scheme needs to be re-designed to address the issues above and provide for walking and cycling routes across the site, set within attractive green infrastructure corridors. We can contribute ideas in that regard.</p>
<p>F. No clear evidence of a Net Gain in Biodiversity</p> <p><i>Objective 3: To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features.</i></p>	<p>The adverse impact and pressure on nearby areas of high quality biodiversity have not been properly taken into account. This site is an important part of the wider landscape, and sits directly next to Black Park, a particularly sensitive site.</p> <p>Insufficient data has been provided to demonstrate a thorough understanding of the biodiversity credentials of the site and the impact the development would have on sensitive areas nearby. Whilst the applicant claims there will be at least a 10% net gain in biodiversity on site, insufficient information has been provided to justify this assertion.</p>
<p>G. A major loss of landscape quality and visual amenity. This is especially in terms of the rural/ countryside setting it provides to Black Park and its approaches. A key test is not the effect of the proposal on the site itself but on the surrounding area.</p> <p><i>Objective 1: To maintain and enhance the landscape, historic environment and</i></p>	<p>There are currently open views across the fields of the site from all angles – from the A412 and from Pinewood Road, but perhaps most significantly from Black Park and the historic Peace Path.</p> <p>The views are of open, agricultural type land, albeit in the latter stages of restoration after mineral workings. There is no immediate context for the huge scale of buildings proposed, and what buildings exist are occasional, small scale and discrete.</p> <p>Landscaping of the site would be incidental to the scale and extent of the proposed development. In the GB it is critical to maintain the experience of not being in an urban area and retain rural character. This would not be the case, and there will be a loss of landscape and visual amenity. Whilst buffers around the edge of the site can be included, they would be insufficient to offset the sense that the site will be developed and the loss of the open landscape.</p>

<i>waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</i>	The Colne and Crane GI Strategy provides guidelines to maintain open views across fields, together with conservation and management of hedgerows within an agriculturally dominant landscape. This would not be achieved.
H. Unsustainability of the location as a place of work and for a visitor attraction, drawing people from a wide catchment, with public transport and active travel options inevitably serving only a small proportion of trips to the site.	<p>This is an inherently unsustainable location, especially for an ‘urban’ visitor attraction. The proposed shuttle bus from Slough Station is a ‘drop in the ocean’ towards sustainable travel.</p> <p>There will not be a network of safe <u>and attractive</u> walking and cycle routes connecting the site with main nearby areas of population e.g. Uxbridge and Slough – or serving the network of smaller settlements in this area.</p> <p>Recreation routes connecting the site with the wider part of the Colne Valley Park it is situated in (for example to the Grand Union Canal to south and to the east) are fragmented at best, and in many places non-existent.</p> <p>It is inevitable there will be a continuing dominance of car-reliant travel and this proposal is not located where it is or can be made sustainable, a key provision in the NPPF.</p>
<p>Overall Conclusion on Harm</p> <ul style="list-style-type: none"> • The development is inappropriate and causes major harm to the GB and CVRP, and to the purposes of their designation and objectives for their protection and improvement • It will forever change the open, rural character of the area • It will not contribute positively to the beneficial uses of this rural area, and offers no guarantee of biodiversity net gain • It represents unsustainable development, adding a great weight of traffic to this rural area • It forms part of a larger change to this sensitive part of the GB and CVRP, a creeping incursion that has to be stopped if the GB and CVRP is to retain its integrity • This raises an issue of national and regional importance 	

Part 4: Comments on Mitigation

36. For the avoidance of doubt the CVRP objects to the principle of this development because of its inappropriateness in the GB and Regional Park and the extent of harm we have outlined.
37. It also considers that even if the decision maker considers there to be a persuasive case for the development the level of mitigation proposed falls well short of what would be needed to outweigh the harm identified and fundamental ‘inappropriateness’ of this large development. This requires a sea change of approach and, until that is rectified, the very special circumstances test should not be considered met.
38. The applicant’s agent, at para 22 of their December 2020 response, dismiss the CVRP’s call for mitigation because they consider the tests of reasonableness for planning obligations not to be met. We disagree and see that the applicant/ agent is taking too narrow a view of the impacts and level of mitigation required.
39. The CVRP’s objection dated October 2020 set out some areas of mitigation, as did correspondents. We summarise below the categories and general scope of mitigation needed, but it is just headlines. We have heeded the tests of mitigation being:
 - a. Necessary to make the development acceptable in planning terms
 - b. Directly related to the development; and
 - c. Fairly and reasonably related in scale and kind to the development
40. The sheer scale of this scheme and its impact on the GB and CVRP means that mitigation must be commensurately significant and extensive.
41. But, before this comes into play and if the scheme is to proceed further, its layout and building design must first be modified to create a ‘greener’, less intrusive, development.

This needs to incorporate excellent permeability across the site to Black Park for walking and cycling, set within generous green infrastructure corridors.

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

Area Wide Improvements to promote walking and cycling

- a) A substantial financial contribution (at least £1.75m) to go towards a fund for a programme of improvements to active travel routes that can connect the site and its vicinity with trip origins and destinations across the Green Belt quadrant between the two arms of the Grand Union Canal (south and east), the edge of Slough and the M40 to the north.
- b) We anticipate this to specifically involve improved active travel links to nearby settlements and countryside destinations e.g. Iver Heath/ Pinewood/ Black Park/ Langley Park (with new crossing(s) over the A412) and generally towards Uxbridge/ the Grand Union Canal (both arms)/ Colne Valley Trail/ National Cycle Network (A), Slough and railway stations.

Promotion of and investment in the green environment in the area around the application site

- a. A blend of identified projects and a substantial fund (at least £.75m) to be applied within the area 3km around the site (as the crow flies) and implemented within 10 years of the commencement of the use on the site
- b. Projects to include ones aimed at:
 - Landscape improvement
 - Reinstating a productive landscape (Y) in this area, o Farmland and other biodiversity enhancements (S) o Developing links with the education sector (Q)
 - Developing communities and friends groups (P)
 - Providing new and enhanced visitor experiences

Area Wide Management and Maintenance

- c. An annual fund of £25k for 25 years from commencement of the development, to fund a CVRP Countryside Management Service (P, R, X), to care for the area around the site whilst fostering community engagement.
- d. This could link to a 'green team' to add an employment/training angle (Q) and deliver on other objectives eg Biodiversity and link with partner organisations (eg Black Park, Iver Parish). It would assist with the improvement of road corridors to retain and re-create the countryside feel (Z).

Biodiversity Net Gain of at least 10%

- e. Details as agreed with the Council's Ecology Officer

ANNEX 1 Colne Valley Regional Park – Six Objectives

- 1. To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.

2. To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

ANNEX 2

Farming as a key part of the beneficial side of the Green Belt and the CVRP

1. A vibrant agricultural economy is an essential ingredient for underpinning, enhancing and maintaining the Green Belt. It is one of the six key objectives of the CVRP and is particularly important where a green buffer is under direct and intense pressure from urban areas close by.
2. The Pinewood Group's argument appears to be based on a fundamental misunderstanding of the history of the site: it has always been treated and managed as a productive farm since before the gravel extraction. The planning consent for gravel extraction acknowledged and formally recognised the agricultural importance of the land, and clearly stated it must be returned to farming use on completion of the temporary mineral extraction.
3. That planning consent was granted at a time when Pinewood Studios was considerably smaller than it is today and its significant expansion (combined with the latest visitor attraction proposal) represents another step to undermine farming activity in the area.
4. There are numerous examples of enterprising agricultural techniques being used to restore former mineral sites to greater productivity. Agriculture can also underpin other access, biodiversity and landscape objectives. It is a fundamental tenet of Green Belt designation, and is the key part of what keeps the Green Belt green.
5. The Covid-19 pandemic has dramatically altered purchasing patterns, with demand now focused increasingly on local food supply, highlighting the value of a working food landscape. Once this land is gone, it cannot be used to produce food in the future.
6. The continued fragmentation of farmland poses a particular challenge for the CVRP. Speculative developers have escalated farmland values far beyond the means of normal agricultural activity. Loss of agricultural land should be mitigated by investment in other local farmland to secure its future.

(28.10.2020)

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 10 miles of the Park. The Park covers an area from Rickmansworth to Staines, across parts of Herts, London, Bucks, Berks and Surrey. The six objectives of the Park are:

1. To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.
2. To safeguard the countryside of the Park from inappropriate development.

Where development is permissible it will encourage the highest possible standards of design.

3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

The Colne Valley Park CIC strongly objects to this application because:

- A. The development is contrary to Green Belt Policy and will harm the Colne Valley Regional Park.
- B. Mitigation relating to the above is inadequate

Colne Valley Regional Park objectives:

We disagree with the assessment on pages 56-58 of the Planning Statement that the application delivers a gain relating to the Colne Valley Regional Park objectives. The Planning Statement completely ignores the effect on the Rural Economy (farming) objective, and underplays impact on the Landscape, Countryside and Recreation objectives. With regard to our Biodiversity objective, we acknowledge the 10% net gain delivered on site, but in our view this does not outweigh the harm caused to the other objectives.

Permissive path from Iver Heath to Black Park:

The existing permissive path is to be lost and a new one provided. However, this is in a location that doesn't connect as many local residents with Black Park as well as the current path, does not improve the connection to public footpath 4 and is in an unattractive urbanised setting through a car park. Our expectation is that a development of this scale should take the opportunity to improve the off-road connections through the site between Iver Heath and Black Park, rather than making them worse. Peace path should be retained in its current location. A better location for new path between Iver Heath and Black Park would be in the green infrastructure corridor around the Lodges and through the centre of the site. This GI corridor should be widened to allow for accommodating the path and habitat connectivity

Black Park:

Black Park is one of the key visitor attractions within the Colne Valley, and its situation within a rural landscape is important. The impact of buildings of up to 21.5m high within 30m of the bridleway on the east of the Park is huge. We find it incredible that this impact is described as being not significant. There will also be additional visitor pressure on the Park. The significant additional light and noise pollution adjacent to Black Park is unacceptable.

Green Belt:

The site is not identified in the Local Plan – neither the existing plan nor the emerging local plan. The development is clearly at odds with the National Planning Policy Framework relating to green belt.

The exceptional circumstances for building on the green belt have not been proven - there is no reason why this visitor attraction needs to be co-located with Pinewood. Whilst there may be an employment argument from a national perspective we are not convinced that that pertains here. This is a high employment area and it seems likely that most of the jobs that will be created will have to be filled by people travelling from outside the area.

This proposal is a further example of the piecemeal development happening in the green belt across the Colne Valley Regional Park. Claiming 'Very Special Circumstances' is becoming a standard approach for large developments seeking to build on the Green Belt. Because of the sheer number of applicants claiming 'Very Special circumstances' for development in the green belt we believe that developers should no longer be able to justify that the circumstances are 'very special'!

Sustainable Development:

The project does not deliver well against all three principles of sustainable development. We understand the economic argument, but since this does not directly concern our objectives we make no further comment. The social argument might be made stronger with better active travel. The environmental argument is very weak, with only 9.8ha of on-site green infrastructure – much of which is already present.

Mitigation:

We fundamentally oppose this application which we feel is out of all proportion with the site and its surroundings, but in any case the suggested mitigation is woefully inadequate for a development of this exceptional size and impact in the green belt and Colne Valley Regional Park even if it were to be approved.

To address the impact and to help better align the development with the social and environmental pillars of sustainable development we make three broad suggestions:

- 1) Mitigation for the impact on the Colne Valley Regional Park through implementation of the Colne & Crane Green Infrastructure Strategy for the benefit of local residents and visitors to the screen hub. This should be delivered through funding a Countryside Management Service (whole area opportunity X) delivering improvements in the vicinity of the development including whole area opportunities A,P,Q and mid-Colne opportunities MC104, 201, 203, 205, 207
- 2) Mitigation to address the visual, lighting, noise, disturbance impact on Black Park as well as increased visitor numbers
- 3) Uxbridge to Black Park cycle/walking route taking the opportunity, where possible, for attractive off-road routes away from busy A-roads. This would benefit residents of Uxbridge and West London who want to use 'active travel' to visit the proposed screen hub and Black Park. It would also provide a clear benefit for residents of Iver Heath and for Pinewood employees. A feasibility study should be commissioned now

with implementation linking to future planning applications should this outline application be approved. This study should focus on are-wide links as well as local links e.g. opportunity to improve footpath IV4 to encourage walking and/or cycling access for local residents and employees. Buckinghamshire Council and the Colne Valley Regional Park should be involved in the specification for the feasibility study and in reviewing outputs.

We would be happy to engage with the Local Planning Authority or the developer to discuss any of the issues raised.

CPRE Bucks

(18.10.20)

We are writing to object to the above referenced Planning Application, regarding the outline planning permission with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub, including a visitor attraction, an education hub and a business growth hub.

The Buckinghamshire branch of CPRE, the Countryside Charity (CPRE Bucks), as a long standing charity, seeks 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 because:

- The land is designated Green Belt and this proposed development is contrary to the NPPF;
- It is also within the Colne Valley Regional Park and would considerably degrade the setting of the Black Park Country Park.

The Land is designated Green Belt

The site is located within the London Metropolitan Green Belt. The National Planning Policy Framework (NPPF, February 2019) says "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]. The NPPF also says "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." [Para 136] This site is not in the Local Plan, neither the existing plans nor the emerging Local Plan.

The NPPF also says: "Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."
- [Para 134]

This proposal clearly breaches the third of these purposes as well as, arguably, the first. This is because, in recent years, the Studios have already expanded massively into the Green

Belt, notably to the east side of Pinewood Road and therefore we consider this is now a large built-up area that is continuing to sprawl into the countryside.

The NPPF also says: “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.” [Paras 143, 144]

The expansion of the Film Studios and introduction of a commercial venture (the Visitor Attraction) do not constitute “very exceptional circumstances”, which case law has demonstrated are very rarely demonstrated. Certainly not here.

And finally, on the subject of the NPPF, it should be noted that the “presumption in favour of sustainable development” does not apply in these circumstances, ie: Green Belt [Para 11 b) i].

The site is within the Colne Valley Regional Park

The Colne Valley Regional Park (CVRP) includes the land where this proposed development is to take place, but it also includes the Black Park Country Park, which is adjacent to the site. CVRP was established in 1965 when the previous generation saw its potential to serve communities of west London and neighbouring counties in providing a valuable escape into the countryside. It has six objectives, which include:

- To safeguard the countryside of the Park from inappropriate development.
- To conserve and enhance biodiversity through the protection and management of species, habitats and geological features in the Park.
- To maintain and enhance the landscape, historic environment and waterscape of the park.
- To provide opportunities for countryside recreation and ensure that facilities are accessible to all.

This proposed development will not meet any of those objectives. Black Park in particular is visited by well over six hundred thousand people per year and this development will inevitably detract from the attractiveness of that environment, certainly to the east side of the park where the development would be clearly visible and will undoubtedly cause noise and pollution from the (presumably) many hundreds of thousands of additional people attending the “visitor attraction”.

The plans for this proposed site clearly show that the proposed buildings would be massive. Not only would the buildings be very large in area, but also very high. Many buildings close to Black Park could be up to 21,5m, which could not possibly be effectively screened by the “landscape buffer” proposed and would also be higher than much of the existing tree line.

Accordingly, for all the reasons we have set out, we would request that the Council refuse this application.

Neighbouring Authorities

Royal Borough of Windsor and Maidenhead

(29.11.21 comments below, original comments 27.11.20 also raised no objection)

I write to inform you that the Royal Borough of Windsor and Maidenhead has no objection to the above proposal.

Slough

(16.12.20)

Please see below an overview of my comments regarding air quality impact for Slough. I was informed by our planning case officer that there will be a resubmission of the assessment once at the detailed design stage, where we will have another opportunity to provide comments, however I thought you may find these comments useful at this stage.

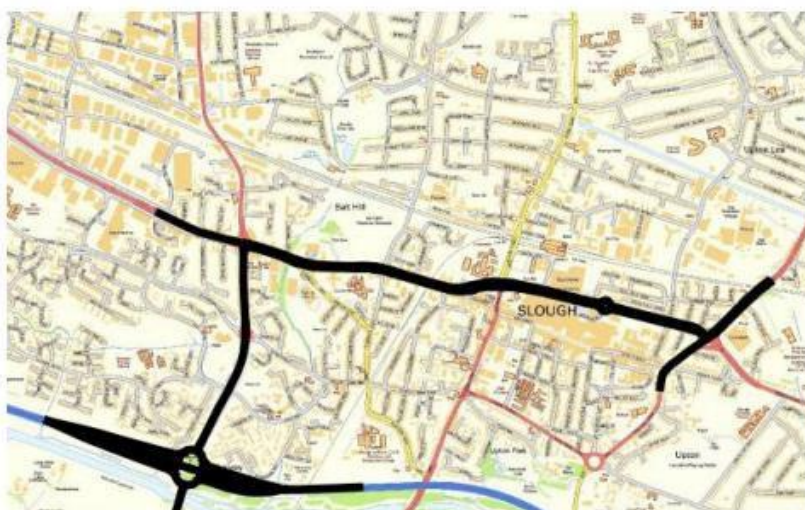
Air Quality Comments:

The proposal includes provision of 2,341 car parking spaces spread across the different site uses (visitors, education centre etc) and 269 cycle parking spaces.

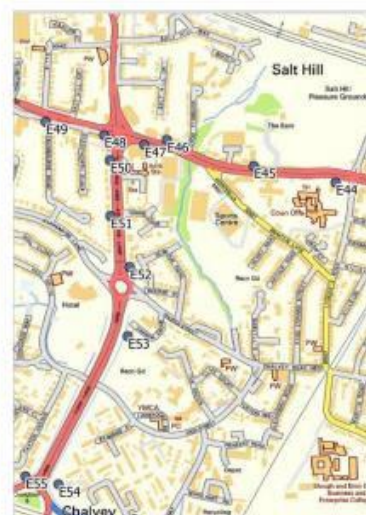
The AQ assessment has a section which identifies impacts in the Slough study area (roads marked in black on map below).

Study Area:

Receptors in Slough Study Area:



Identified



Within the construction phase chapter, 110 LDV and 70 HDV trips per day are expected to impact Iver's AQMA 2. The construction traffic vehicle routing is not included in the AQ

assessment so it is not clear if impacts will be experienced at Brands Hill. The study area for Iver suggests the main route of traffic will be using Junction 1 of the M40 so we would look to request a condition that no construction traffic accesses the site via Brands Hill.

During the operational phase, the biggest increase of NO₂ identified in Slough is at E40 and E41 (Wellington St), increasing by 0.4ug/m³ in 2020 do something compared to the do nothing scenario. Increases in PM_{2.5} and PM₁₀ are minimal. The model is based on 2020 - due to the impact from Covid-19, it has been assumed that no background traffic growth occurred between 2019 and 2020.

To mitigate against air quality impacts, the developer proposes to implement a travel plan to reduce vehicle impacts, including:

- ☐ EV charging – 5% of all parking spaces will be provided with fast electric vehicle charging points (i.e. active provision), with a further 5% of spaces provided with appropriate infrastructure to allow charging points to be implemented if the demand is necessary (i.e. passive provision). This is supported.

- ☐ Free shuttle bus for visitors to the proposed scheme studios.

- ☐ Provision of new bus service from Slough rail station to site. It is Slough's preference that this is an electric bus.

Once at the detailed design stage, we request that a meeting is set up between South Bucks and Slough Borough Council, to discuss impacts and mitigation.

Hillingdon

(22.01.21 official response pasted below, additional information/correspondence dated 26.01.21, 13.01.21 and 14.01.21)

Thank you for your consultation received on 9 October 2020. The London Borough of Hillingdon

objects to the proposal for the following reasons:-

The London Borough of Hillingdon objects to the application which is an inappropriate development within a large area of the Green Belt requiring very special circumstances to be robustly justified. There is insufficient information demonstrating the proposal would not result in an adverse impact on the local highway network. It is requested that a decision is not made on the application under ref: PL/20/3280/OA until further detail is provided in respect of highways impact and the London Borough of Hillingdon is consulted on the additional information provided.

OTHER REPRESENTATIONS:

First round of consultation. Representations included approximately 214 objections and 185 letters in support.

The grounds of support are summarised below:

- Educational, cultural and social benefits for the local community, those working at and visiting the studios as well as the wider film and TV industry
- Screen hub UK estimated £450m investment for the UK film and television industry
- Covid-19 economic recovery nationally, for Bucks and locally in the Ivers
- Pinewood bring in big productions and overseas money. This is beneficial in a time of economic uncertainty
- Global reputation of Pinewood studios as a film industry leader and of Britain in this market
- Will help to address unemployment caused by Covid-19 and benefit local community
- Support the Buckinghamshire LEP Local Industrial Strategy and its Economic Recovery Plan
- Opportunity to celebrate the crews, the storytellers and the creative industries that are a global economic and cultural success for the UK
- Valuable social investment for the UK film and TV industry
- Investment will secure the future of Pinewood Studios
- Combination of business, education, attraction supports apprenticeships and reskilling opportunities
- Development of individual and business and their skills, contributing to screen economy
- Pinewood essential to success of many SME companies
- The Creative Industries can play a leading role in helping us to build back better and therefore continue to be committed to the support and development of the Creative Industries as set out in the Industrial Strategy Creative Industries Sector Deal
- A further expansion of Pinewood Studios would bring substantial economic benefits and an opportunity to link with both the Experience ('Live Pinewood') as well as 'Centre Stage' which will bring practical, transferrable experience
- Job creation: 3,500, including over 1,500 during construction.
- Proposals could add approximately £230m pa to the economy and an additional tourism spend of £125m pa
- Over 500 apprenticeships and reskilling opportunities over next 5 years
- Growth hub supporting start ups and incubation function for people and companies to serve the film industry
- Further Pinewood expansion would bring substantial economic benefits and an opportunity to link the visitor attraction with centre stage
- The proposal will support more community and school engagement with the film industry
- Partnership with National Film and Television School of further benefit
- Provision of opportunities in the industry for those that need them most
- Wouldn't usually support development of Green Belt land but consider the landscape strategy well put together and supportive of biodiversity

- Pinewood support and benefit the local community
- Visitor attraction to be in the top 10 in the UK – substantial positive impact on tourism and hospitality sector
- Transition to film tourism sector should be supported The Pinewood Studios Experience would play a vital part in the rebuilding of the regional economy post COVID-19 and due to Brexit, having the potential to become a valuable and popular year-round attraction for domestic and international visitors. Raising the profile of the region, the project could increase visitor engagement, encouraging spend across the wider region, and play an important part to kick start the national visitor economy
- Ability to educate visitors about the heritage and Pinewood's history as the UK's oldest film studio
- Welcome attraction to celebrate Pinewood's heritage and legacy, synonymous with some of the most iconic and memorable films ever made. From The Red Shoes, Superman, James Bond and Star Wars it is filled with film heritage that even Hollywood can't rival
- Granting of permission would encourage the development of the area into a sought after area to work and live
- Good use of land
- Development of green campus
- Opportunities for improved infrastructure should be insisted on and embraced particularly in relation to traffic and road infrastructure

The grounds of objection are summarised below:

Harm to character and design

- Harmful impact on semi-rural character of surrounding area. The Ivers is experiencing development pressure from the South and East.
- Iver Heath is being engulfed by further development including the continued expansion Pinewood Studios.
- Area becoming a less attractive place to live.
- Loss of peacefulness due to daily 6500 visits to attraction.
- Industrial appearance of existing Pinewood complex - Pinewood East warehouses are large industrial units, harmful visually and proposed development will result of more of the same
- Change of village character with countryside to urban/industrialised waste land/estate
- A large and prominent entrance is unacceptable and completely out of character with the houses and fields on the Pinewood Road.
- Extensive and highly visible surface level car parking
- Merging of Villages of Iver Heath and Fulmer.
- Poor design
- Overdevelopment
- Detriment to historic assets
- Contrary to development plan
- Concern the Ivers will become an urbanised extension of Slough or Greater London
- Contrary to Colne Valley Regional Park Objectives
- Loss of farmland

Green Belt

- Contrary to purposes of the Green Belt
- Contrary to national and local policy
- Green Belt should be protected
- Destruction of Green Belt
- Lack of justification for location of the proposed visitor attraction in this location. More appropriate on a brownfield site.
- Harm to the openness of the Green Belt
- Green Belt land already lost to recent Pinewood expansion
- The quarry works being undertaken on this land required that the site be returned to agricultural use.

Neighbour/Local Amenity

- Loss of view
- Impact on neighbouring amenity due to industrial scale of studios buildings
- Lack of consideration of the impacts on local residents. Lack of mitigation of impacts
- Use of Black Park for commercial filming already diminishes enjoyment of the park
- Black Park ruined by having development built alongside
- Overshadowing, overbearing, loss of privacy, interference with neighbouring properties
- Existing light pollution associated with night time filming and security lighting at Pinewood
- Lighting should be low level
- Insufficient infrastructure in the area to support the proposed development
- Lengthy opening Hours of attraction, 7 days a week. Disturbance. Opening hours not made explicitly clear.
- Local residents enjoy respite from Pinewood and associated activities/traffic implications at the weekend and this will no longer be the case
- Iver Heath overcrowded with additional visitors
- No consideration for existing residents
- Physical and mental health impact

Highways

- Traffic impacts: congestion, increased traffic and infrastructure
- Traffic improvement works will not lessen the inconvenience of existing residents.
- 40% increase in traffic
- Five Points roundabout cannot cope with increased traffic
- Robust traffic management plan required to prevent visitor attraction traffic from using 5 Points Roundabout at this would impact local traffic and amenities
- Rattrunning through areas of Pinewood Green to A412 and onto M25. Road should be closed off as it was historically, danger, disturbance, high speeds, sat navs
- Pinewood Green should be closed to through traffic
- Access and egress into the site and the potential for congestion on the road network
- Congestion on A412.
- Proximity of main access to crash site
- Road quality of Pinewood Green poor.

- Pinewood Green residents have to time when to leave their properties due to the traffic situation
- Pinewood Road needs to be widened as the size of vehicles using the road do not fit onto one side
- Traffic and safety concerns
- Despite the provision of a shuttle bus service from Slough the majority of visitors will want to drive to the site, as indicated by the 2,341 car parking spaces proposed.
- Baseline for assessment does not include additional increase in traffic relating to the east expansion
- No adequate link from local train stations.
- Unsustainable location - Mode share targets low, if Pinewood is looking to be more sustainable need a more ambitious target is needed and a greater number of electric charging points should be provided.
- Poorly configured local roads
- Signage has not deterred existing traffic from using unsuitable routes
- Poor road maintenance in local area
- Currently Pinewood employees park within nearby residential roads
- Staff Parking - Parking of Pinewood employees within nearby residential roads as need to pay to park in the site car park (in association with visitor attraction)
- There are inadequate speed calming systems currently in place and road signage is poor.
- Impacts on Sevenhills Road: Increased traffic on Seven Hills Road and Seven Hills Road should only be used for resident and business access
- HGV and construction damage to local roads
- Contrary to policy to reduce the number of HGVs in the Ivers
- Congestion in area has already resulted in rerouting of the bus route resulting in inconvenience to residents.
- Since the expansion of the studios traffic in the area has become problematic.
- Pinewood employees use of local roads inconsiderate
- Traffic is already difficult getting through Iver Heath during the hours of 7.30am - 9am and 4pm - 6pm.
- When the M25 has problems everyone comes off at Denham and then uses Iver Heath which then brings everything to a stand still.
- Commuters station parking on local roads exacerbated
- Parking along the A412 dual carriageway is already dangerous and over crowded (partly thanks to the misguided parking charges of the country parks and their horrible commercialisation)
- Potential for attraction visitors to park on local roads and the need for parking management schemes (e.g permits) which will inconvenience local residents
- Insufficient parking proposed to serve the proposed development
- Urbanising improvements to Five Points roundabout not wanted
- Cycling has not been sufficiently considered and addressed
- Emergency service access
- No proposals for the diversion of traffic to the M4
- the 5 points roundabout is a historic landmark, which is close to people's hearts, we do not want it concreted over.
- Effect on Iver Heath infant school entrance on Slough Road – danger

- Shuttle bus routes to Gerrards Cross inaccurate and misleading (due to route via ford)
- Conflict with use of Petrol Station on Uxbridge Road (the only one in the area) due to queuing
- What improvements can be made to Church Road due to increase in traffic
- Parking should be off site – park and ride

Environmental Concerns

- Unknown damage to water course.
- Environmental and wildlife impacts.
- Detrimental impact on Black Park wildlife and other parks
- Land waste water discharge into Black Park
- The ecological impact of such a huge development on the fields and local wildlife together
- Concern regarding night-time filming activities and associated lighting. Detrimental impact on Black Park wildlife.
- Existing light pollution associated with Pinewood
- Loss/damage to trees
- Air quality Impact: /Fumes poor/worsening and exceed legal threshold
- The Ivers is an AQMA and targets are already not met- proven that the junction of Pinewood Green and Pinewood Road is one of the highest in the area for pollution.
- Health concerns exacerbated –Asthma
- Smell
- Flooding in local area - concern re development hard landscaping. Severe flooding around the north side of Pinewood Studios since expansion. The water table has risen and is rising. Potential to flood homes.
- Associated noise and light impacts
- The additional usage of services (water, sewage, electricity etc.) has not been taken into account.
- Level of ecological survey submitted unsatisfactory
- The SSSI in Black Park is a valuable local resource that requires protection
- The site lies within a Biodiversity Opportunity Area
- Climate change – no estimated carbon footprint is detailed and Pinewood should be held to account for environmental impacts
- Design information relating to climate friendly initiatives limited e.g green roofs
- Shuttle busses should be environmentally friendly

Peace Path

- Concern re loss of the Peace Path and location of alternative provision not identified.
- Removal of the current linkpath is also unacceptable. This is used by a significant number of local residents as it is in a very good location to access for many residents
- Really important connection – it would be hugely disappointing and upsetting if the access path is taken away. The development will act as a barrier to accessing Black Park.
- The little path which leads to the Black Park will disappear, therefore we will have to go all the way through the other entrance, which have inappropriate road layout for buggy or kids bikes and is not safe for walking!
- Harm to quality of life and health

- Alternatives routes should be assessed and a study published, including consultation with the local community
- No defined solution put forward.

Local employment

- Experience of Pinewood approach to jobs for local people questionable, not delivered as promised has not met expectations.
- Explanation of where creative industry jobs promised in the last expansion went welcomed
- Pinewood claim to be creating jobs, yet they threw out many of their renters from the main site because of the Disney deal, thereby effectively reducing jobs.
- Job creation associated with attraction does not justify the detrimental harm to the local area
- Disney Deal, loss of jobs due to loss of renters from main site
- Employment forecasts not credible given current pandemic

Other

- Profit driven – purchase of low cost Green Belt then pursuing change of use to generate value. Private equity style ownership with complete disregard for anything other than financial return.
- Greed of Pinewood Studios should not be pandered to
- Local and national authorities ignoring community wishes
- No exceptional circumstances
- Residents on Sevenhills Road not made aware of this application.
- Not all residents in St David's Close Iwer Heath have received a neighbour notification letter. Neighbour notification letter not received.
- Pinewood has land in Denham which would be more appropriate to use and within closer proximity to the motorway.
- Why can't an alternative site be considered for the Visitor attraction 'they say the Visitors' Attraction needs to be adjacent to Pinewood Studios in order for visitors to receive the "Pinewood experience". Is this really a valid reason for the destruction of our community and the quality of residents' lives?' A rationale for locating the visitor attraction should be provided and consulted on prior to determination
- Reference should be made to the conclusions of the secretary of state and if this is applicable
- To avoid Green Belt harm development should be located underground
- Concerns relating to Sevenhills Road consent and associated mitigation.
- The National Film and Television school has been granted funds for expansion, questions the appropriateness of an education hub in proximity. A joint venture might be a positive solution.
- House prices negatively affected
- Alderbourne farm more suitable location
- Brown field site nearer to transport hubs more suitable
- Absence of local benefit
- Harm to health and wellbeing
- Construction disturbance – should be limited to daylight and no weekend working

- Local residents should be compensated for works to properties required to mitigate environmental impacts
- Section 106 monies must be ringfenced to benefit the geographical areas directly affected
- Not necessary for the proposed attraction to be located within proximity of Pinewood
- Previous infrastructure improvements in the local area have not transpired
- Increased litter problem
- Cumulative construction and development impacts in the local area due to major initiatives including: Cross Rail, HS2 and Heathrow expansion.
- Negatives voiced by locals relating to previous expansion experienced rather than the benefits presented by Pinewood.
- Contrary to emerging neighbourhood plan -this area is Green Belt, the neighbourhood plan showed Pinewood Road as the final boundary of development in Iver Heath.
- Council should expect a significant number of compensation claims
- What compensation is to be offered to local residents
- Increase in crime in local area
- The withdrawn Local Plan identifies housing to be built on the eastern side of Pinewood Road 'Will this additional development cause even more traffic chaos or will it force the erection of houses on other inappropriate areas in Iver Heath?'
- Increases likelihood of development coming forward on the opposite side of Pinewood Road
- Development of land on the opposite side of Pinewood Road should not go ahead and this should be supported by Pinewood.
- Concern relating to preparation works on site
- Concern that the proposed development has already been approved
- Lack of stakeholder engagement pre submission – bid to secure fast track approval without proper engagement with local residents and stakeholders. A considered and open dialogue with Pinewood Studios and the local community would be welcomed. Engagement compromised by Covid-19 and online events not properly advertised. Face to face engagement essential to allow all views to be considered.
- Concerns 'Visitor Attraction' similar to a Theme Park
- Waste/ fly-tipping in local area
- Visibility of Pinewood from motorway
- Comments supporting the application not from those who live in the area
- Cllrs should tour the local road network before making a decision
- Residential properties have to adhere to strict Green Belt rules – double standard
- Unsure of accuracy of assessment due to Covid situation
- Public consultation time insufficient given volume of information submitted. This should be extended
- BNG report cannot be found in the documentation
- Surrounding Green Belt should be protected prior to application determination
- How many other local pieces of land has Pinewood acquired/taken an option on – their ambitions for further expansion are unknown.
- Difficulty commenting as Council website down
- Pinewood should leave a lasting legacy for the residents of Iver Heath

- The Council should request Pinewood submit two separate applications – one for the studios and one for the visitor attraction
- Believe the Council was aware of this application when permission was granted for the Sevenhills Road upgrade
- Lack of regard of Council have for local residents
- Servicing and deliveries to site out of hours
- Notices poorly displayed on lampposts – hard to read
- Human rights compromised

33 further objections and 2 comments of support were received in relation to the second round of consultation:

Additional concerns raised summarised as follows:

- Increase in 'temporary buildings' on Pinewood estates which seem to be permanent in use
- Leasing of proposed buildings/workshops to supporting industries contributes to disturbance in locality with the benefit being to external customers
- Potential impact on bat flying routes resulting from their commuting corridors being cut off. Surveys may not mitigate harm
- The application presents a range of mitigations in relation to the bat colonies. These are also not validated as effective by an independent expert
- Alternative to Five Points Roundabout scheme - suggest that Pinewood Studios opens up an entrance from Seven Hills Road leading to and from the M40 which is where the majority of the traffic is trying to get to and from
- Existing Pinewood employees concerned by lack of on site parking
- More than sixty documents - many of seemingly material consequence and totalling hundreds of pages - have recently been added to the Planning Portal for this application. It is totally unreasonable for residents to fully digest these within the timeframes. The deadline should be extended by at least one month, or more if new documents keep being added as they are now. Question the validity of the planning process which appears to be skewed in favour of the applicant
- ES Addendum does not address issues raised by Temple review relating to climate change and greenhouse gases, air quality and protected species
- Amendments to the application do not address fundamental issues: traffic, noise and air pollution and adverse impact on quality of life for residents
- Process for comment does seem skewed in favour of SHUK, whereby they have continued to add significant documents during the consultation period, making it incredibly challenging and time consuming for residents to provide a fully informed response in the time given
- Proposed closure of Peace Road - this footpath existed before the Pinewood Studios claimed to open it. It was always there, they illegally closed it in the first place. Local residents use this footpath all the time. It must stay open
- The developer should assess more alternatives to the "Peace Path" and publish them, including consultation with local residents, prior to a final decision on the application. Safety concern not considered relating to safe crossing to access new peace path

- Developer refuses to accept that proposal could be viewed negatively or is a worsening of provision. Extended length of route undesirable
- Five points roundabout application PL/21/4074/FA recently submitted and makes no reference to SHUK despite being intrinsically linked
- The application and / or supporting statements make numerous claims about the economic value added by the creative industry. Little is specific about this particular development. The claims put forward regarding benefit are not substantiated by independent expert analysis
- Fires at Black Park and Pinewood Studios and lack of emergency access due to traffic
- Environmental damage and Green Belt destruction should be viewed particularly critically in light of COP 26 outcomes.
- Phase 3 sound stages have not yet commenced construction – example of continued development at the Studios and ongoing disturbance to residential amenity over past 10 years+
- No mention is made of High Pressure Fuel Pipelines that run down the boundary of Black Park 30mtr inside land on the Pinewood Studio side and under the land for the Experience and West complex – have the relevant safety considerations and guidance been considered.