



Report to Strategic Sites Planning Committee

Application Number:	22/06443/FULEA
Proposal:	Full planning permission for production space and supporting buildings for screen-based media and associated services/industries. The development of approximately 168,718 sqm GEA total floorspace comprising : sound stages, workshops , office accommodation, studio hub associated outdoor space such as backlots and unit bases; entrance structures and reception; security infrastructure, mobility hub; cafes; parking; bridge; incidental supporting buildings; associated infrastructure; public art; upgraded vehicular access onto Marlow Road; new cycle and pedestrian accesses; a new cultural/educational/recreational building; a new community building and associated landscaping, publicly accessible recreational land and ecological and environmental enhancements/habitat creation.
Site location:	Land Adjacent South Side Marlow Road And A404 Junction, Westhorpe Park, Little Marlow, Buckinghamshire
Applicant:	Dido Property Limited (Company Ref: 67692)
Case Officer:	Emma Crotty
Ward affected:	Flackwell Heath, Little Marlow & SE
Parish-Town Council:	Little Marlow Parish Council
Valid date:	21 June 2022
Determination date:	11 October 2022
Recommendation:	Refusal for the reasons set out

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1. Summary & Recommendation

The Planning Application

1.1 The Applicant is seeking full planning permission for production space and supporting buildings for screen-based media / film and TV and associated services/industries. The Development will provide 168,718 sqm GEA (gross external area) and comprises: sound stages; workshops; office accommodation; Studio Hub; associated outdoor space such as backlots and unit bases; entrance structures and reception; security infrastructure; mobility hub; cafes; parking; bridge; incidental supporting buildings; associated infrastructure; public art; upgraded vehicular access onto Marlow Road; new cycle and pedestrian accesses; a new cultural/ educational/ recreational building; a new community building; and, associated landscaping, publicly accessible recreational land and ecological and environmental enhancements/habitat creation.

Consideration by Strategy Planning Committee

1.2 The application is not the subject of a Councillor Call-in where the recommendation is recommended for refusal, but due to the size and nature of the proposal in the Green Belt under Part I section 2.5 of the Council's Constitution Officers consider the exercise of delegated powers is not appropriate in this instance and that it would be appropriate for the application to be considered by committee for determination.

Planning Issues

1.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.

1.4 The proposed development would constitute inappropriate development in the Green Belt which by definition is harmful to it (as acknowledged by the applicant) and would result in very significant spatial and visual harm to the openness of the Green Belt.

1.5 The NPPF requirement in respect of Green Belt harm, is to carry out a balancing exercise in considering whether the very special circumstances necessary to justify the grant of planning permission for inappropriate development in the Green Belt exist, and also quantifying the heritage harm and weighing any harm against public benefits, in reaching a conclusion on the overall planning balance.

Green Belt harm

1.6 The proposed development would constitute inappropriate development and would result in very substantial spatial and visual harm to the openness of the Green Belt and in the significant loss of open countryside and be in conflict with the fundamental purpose of the Green Belt policy, 'to prevent urban sprawl by keeping land permanently open'. In addition, the proposals would lead to a conflict with four of the five Purposes of including land in the Green Belt. The proposal would be contrary to local

development plan policies CP1, CP2, CP8, DM42 and RUR4. Very substantial weight is attributed to this identified Green Belt harm. The harm to the Green Belt is afforded very substantial negative weight.

Other harm

- 1.7 Other harm comprises non-Green Belt related aspects of the development. In terms of the other harm: the harm arising from the conflict with Little Marlow Country Park policy RUR4 is afforded significant weight; the harm to the landscape is afforded significant weight; highways and transport harm is attributed significant weight; harm to Burnham Beeches SAC is attributed significant weight; the harm to neighbouring residential amenity is afforded moderate weight; heritage harm is attributed great weight. Overall, the harms weigh very substantially against the application. There are a number of factors which are neutral.

Benefits

- 1.8 The provision of purpose-built studios of this scale, would be a significant economic opportunity given the scale of ambition the Government is now advancing in respect of the TV / Film sector. The development would contribute to developing the strengths of the West London Cluster for UK film production. The education and business hub would help to address the skill shortage in the sector. These benefits are significant and clearly align with local and national economic growth strategies. The economic benefits in terms of employment opportunities, support for local businesses and spend are significant. Overall these socio-economic benefits are afforded significant weight.
- 1.9 Other associated benefits include BNG, afforded moderate weight, Country Park and public access provisions, afforded moderate weight, public uses, cycle and pedestrian route improvements afforded limited weight, and public transport improvements would carry moderate weight. The very limited benefits to heritage assets carry great weight.

Other matters

- 1.10 The proposal complies with the policy and other objectives of the Development Plan and NPPF relating to tree canopy cover, meeting the challenges of climate change and flooding, archaeology, air quality, contamination, and waste. These matters do not represent benefits to the wider area but demonstrate an absence of harm to which neutral weight is attributed.

Overall Summary

- 1.11 The proposal will lead to very substantial harm to the Green Belt adversely affect the setting of the Chilterns AONB and landscape character of the area. The impact on the highway network and the environment is substantially negative. Overall, notwithstanding the benefits of the scheme taken together, it is considered that the benefits do not “clearly outweigh” the Green Belt and other harm. The applicant has not demonstrated ‘very special circumstances’ to justify inappropriate development in the Green Belt for the purposes of paragraph 148 of the NPPF.

1.12 The Wycombe District Local Plan 2019 is recent and overall, the suite of development plan policies is considered to be up-to-date. It is considered that the proposal would conflict with the Development Plan as a whole and there are no material considerations that indicate a decision otherwise.

1.13 **Recommendation:** To refuse permission for the reasons set out.

2 Description of Proposed Development

Location

2.1 The application site is approximately 36.34 hectares in size. It is located to the east of Marlow and around 2km from Marlow train station. It is separated from this settlement by the A404 which links up the M40 to the north at High Wycombe, with the M4 to the south, by Maidenhead. The A4155 (Marlow Road) bounds the site to the north and feeds into the Westhorpe Interchange a junction to the north-west corner of the site and providing the main highway route into/out of Marlow from the A404. Westhorpe Farm Lane bounds the site to the east. This highway serves a number of small business units, an athletics complex and lakes providing recreational activities. The south-eastern boundary of the site is bordered by the Grade II listed Westhorpe House containing 31 residential apartments and Westhorpe park homes (56 x park homes); a number of additional residential dwellinghouses are also located to the south-east of the site including Corners Cottage, a Grade II Listed building. There is a further property located north of the proposed backlot but south of the main film studio facilities. The Crowne Plaza hotel is located by the south-western corner of the site. A train line is located further south, with the River Thames beyond. The settlement of Little Marlow (washed over by the Little Marlow Conservation Area) is around 0.7km to the north-east of the site. The site location plan can be viewed at Appendix B.

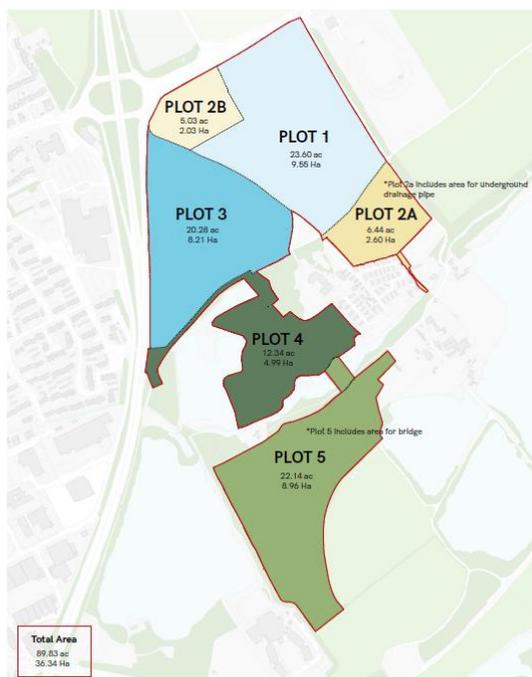
2.2 With the exception of a small area of land within the site used for dog training purposes, the majority of the site consists of open fields and tree belts, having formerly been used for sand and gravel extraction and landfill purposes; the land has been partially restored and re-established naturally with vegetation following these former uses and the site is now well integrated into the landscape. Several quarried areas (outside of the site area, but close to the boundary) were not filled and are now lakes. There is a watercourse running between two elements of the site, with a bridge proposed over this watercourse to provide access to the proposed backlot.

2.3 The site is relatively level (with a fall of only 8 metres from north to south) and at a similar height to the settlement of Marlow. However, it could be described as the valley floor and is in the Thames floodplain. Land rises to the south of the site (beyond the River Thames) at Winter Hill. The site is located within the setting of the Chilterns Area of Outstanding Natural Beauty which begins directly north of the site, on the opposite side of Marlow Road. Land rises up from this point towards High Wycombe (further north).

- 2.4 A public right of way crosses the site in an east-west direction, with a connection to Marlow Town via a footbridge (known as the Volvo Bridge) over the A404. A further public right of way runs alongside some of the western boundary of the site, in a north-south direction.
- 2.5 The site is wholly located in the Metropolitan Green Belt. The site is within Little Marlow Country Park site policy RUR4 area.
- 2.6 Parts of the site are subject to risks of flooding including fluvial, surface water flooding and groundwater flooding.
- 2.7 The site is wholly within a Green Infrastructure Network. The area proposed for backlot (plot 5) is within Little Marlow Gravel Pits Biological Notification Site.

Proposed Development

- 2.8 The Applicant is seeking full planning permission for production space and supporting buildings for screen-based media and associated services/industries. The Development comprises: sound stages; workshops; office accommodation; Studio Hub; associated outdoor space such as backlots and unit bases; entrance structures and reception; security infrastructure; mobility hub; cafes; parking; bridge; incidental supporting buildings; associated infrastructure; public art; upgraded vehicular access onto Marlow Road; new cycle and pedestrian accesses; a new cultural/ educational/ recreational building; a new community building; and, associated landscaping, publicly accessible recreational land and ecological and environmental enhancements/habitat creation.



Site Development Plots.



Proposed site plan

2.9 The aim of the scheme is to be the 'home of choice' for the high-end film and TV industry and to support 'Buckinghamshire's continued recognition as a global epicentre for film and television production'. The campus style development has been purposefully designed for the industry and would include a hub for skills training, as well as a 'centre for social and community life for both the film industry and local neighbours'.

2.10 The proposed film studios will provide 168,718 sqm GEA (gross external area) within 5 plots (refer to image above). The development is concentrated in Plots 1 to 3 on the northern part of the site. Plot 4 is intended to be publicly accessible on a permissive basis and provide ecological open space for the new cultural, educational, and recreational building. Plot 5 contains the main backlot (for outdoor filming) and one of the main on-site areas for Biodiversity Net Gain. The Public Right of Way that traverses the site from east to west will be retained and widened and the surface will be improved.

2.11 The scheme would provide:

- 18 x sound stages / studios 43,921 sqm GEA
- 19 x workshops 38,043 sqm GEA
- Car parking: 1117 spaces including 2 x multistorey car parks (accommodating 1070 spaces)
- Office accommodation 25,997 sqm GEA
- Principal backlot c2ha
- 'Internal' backlot (within the main site) and 3 x unit bases c0.74ha
- Entrance Square consisting of cafes, reception, offices, mobility hub, shower and changing rooms, bike storage, creche, health and fitness rooms and security office
- Studio hub consisting of an exhibition and event atrium, screening rooms, additional rooms for educational purposes/ working space, bars and café 2,736 sqm GEA
- Skills and Culture Academy, consisting of flexible function spaces and a café. This building could be opened to the Public for events. 947 sqm GEA
- Recreational space with permissive path, enabling use by the Public.
- Community building consisting of a flexible space for functions and envisaged to be used like a traditional village hall by the community. 147 sqm GEA
- Bridge, linking Plots 4 and 5 to access the principal backlot.
- Construction of a roundabout and related works to the A4155 highway at the access point.

Layout, appearance and form

2.12 The general arrangement of buildings on the site is set out in a grid layout with the access to Westhorpe House and Westhorpe Park homes traversing diagonally through the grid. Larger buildings, such as soundstages, are located centrally within the site with smaller workshop buildings located around the edges. The proposed access has changed through the course of the application. It would now consist of a roundabout with four access points on the A4155 (Marlow Road).

- 2.13 In terms of appearance and form different design approaches have been adopted for different building types.
- 2.14 The sound stages would mainly be large black 'boxes' up to 22m high. They would be metal clad, with bold strips of colour as signage/ to camouflage the external access stairs. Green roofs are proposed for the soundstages to assist with visually assimilating the buildings into the landscape and delivering ecological value and contribute to slowing the rate of water run-off. They would also have photovoltaic panels. Green walls will also be used on the eastern side of 3 sound stages (along side Westhorpe Farm Lane).
- 2.15 Offices and workshops would be in a variety of designs, including two and three storey units up to 15m high with asymmetrical pitched roofs, and flat roofed, rectilinear buildings. The materials palette includes metal cladding, pre-cast concrete, timber and glazing, particularly at first floor levels.
- 2.16 The car parks would be over 5 levels and up to 20m high and clad with metal cladding to create a 3D geometric pattern.
- 2.17 The studio hub would contrast with the rectilinear designs of the majority of buildings, being a curved structure with large glass panels.
- 2.18 The culture and skills academy is more traditional in design with timber cladding and large, steep, pitched roofs.
- 2.19 The community building would be a simpler and smaller building- timber clad with a pitched roof.
- 2.20 Examples of elevations have been provided in Appendix D.
- 2.21 The site slopes from north to south with an 8m fall and some cutting and filling is proposed. The finished floor levels for the proposed development have sought to match the current levels where possible and AOD heights have been provided in Appendix C. Illustrative site sections show how the development would tie in with surrounding land levels.

Access

- 2.22 The access to the proposed studios is from the A4155 Marlow Road marking the northern boundary of the site and is by way of a new roundabout junction located directly to the east of the A404 Westhorpe roundabout junction. The originally submitted application included a proposal to upgrade the existing junction to Westhorpe House to a signal-controlled layout. This has been amended to the proposed roundabout. This provides the main vehicular access into the site and its security control

point as well as access to the southern areas of the site and Westhorpe House. The proposed roundabout layout has a single lane entrance and two lanes exiting.

2.23 The A4155 Marlow Road feeds into the Westhorpe Interchange, a junction to the north-west corner of the site and providing the main highway route into/out of Marlow from the A404. The A404 links up the M40 to the north at High Wycombe, with the M4 to the south, by Maidenhead.

Timescales and Phasing

2.24 Timescales were provided in the original submission documents (2022). It was estimated that the Development would be built-out over a period of approximately 3.6 years (44 months), starting in 2023 and completing in 2027. Site preparation was anticipated to start in 2023 and last for approximately one year, with construction anticipated to start in 2024, finishing in 2027. It is currently proposed that Phases 1-3 of the construction programme would be complete and operational by an earlier year of 2025, with the remainder of the site being completed and operational in 2027 (phase 1 would consist of access works, phase 2- backlot, entrance square and northern multi-storey carpark and phase 3- most northerly studios (x4) and workshops (x4)). The Hub would be in Phase 4 and the Community Hall in Phase 8. The phasing plan is shown in Appendix F.

Planning application submissions

2.25 The application drawings are listed in B2. The application supporting documents include:

- 1 Planning Statement
- 2 Design and Access Statement
- 3 Strategic Case for Development
- 4 Sequential Assessment
- 5 Economic Case
- 6 Skills and Workforce Development Plan
- 7 Tree Canopy Cover Assessment
- 8 Landscape Management and Maintenance Plan
- 9 Transport Assessment
- 10 Flood Risk Assessment
- 11 Sustainability Urban Drainage Strategy
- 12 Lighting Design Strategy
- 13 Arboricultural Report
- 14 Utilities Statement
- 15 Minerals Assessment
- 16 Operational Waste Management Strategy
- 17 Sustainability Statement
- 18 Energy Statement
- 19 Statement of Community Involvement
- 20 Security Needs Assessment
- 21 Agricultural Land Assessment

- 22 Daylight and Sunlight Analysis
- 23 Light Pollution Analysis
- 24 Solar Glare Analysis
- 25 Biodiversity Net Gain
- 26 Habitat Regulations Assessment
- 27 Heritage Statement
- 28 Framework Travel Plan

2.26 Amended plans and additional information were submitted in March 2023, following comments made and clarifications requested, by consultees and the case officer. The most significant alteration to the scheme, through this set of amendments, is considered to be an alternative access and junction arrangement onto the A4155, whereby a roundabout is now proposed, instead of a signalised junction. The additional documents submitted in March consists of an Addendum Planning Statement with the following documents appended:

- Appendix 1 – The Benefits of New Film Studios on Local Heritage and Landscape
- Appendix 2 – Design and Access Statement Update
- Appendix 3 – Canopy Cover Update
- Appendix 4 – Minerals Assessment Update
- Appendix 5 – Statement of Community Involvement Update
- Appendix 6 – BNG Update
- Appendix 7 – Bridge Design Note
- Appendix 8 – Response to Natural England
- Appendix 9 – Volterra Response to LSH Report
- Appendix 10 – Updated Plans Pack and Drawing Register
- Appendix 11 – Alternative Site Selection Assessment
- Appendix 12 – Addendum to Original Sequential Test
- Appendix 13 – Arboricultural Impact Assessment
- Appendix 14 – Security Needs Assessment Update
- Appendix 15 – Utilities and Foul Drainage Statement Update
- Appendix 16 – Glossary Update
- Appendix 17 – Large Scale Film Studio Comparison
- Appendix 18 – Film and Training Publications

2.27 A further submission of amended plans and additional information was received in June 2023, following consultee/ council officer comments. Additional/ amended documents include an Addendum Planning Statement with the following documents appended:

- Appendix 1 – BNG Land
- Appendix 2 – Addendum 2 (Document 25) – Biodiversity Net Gain – onsite assessment
- Appendix 3 – BNG Technical Note – off-site
- Appendix 4 – Westhorpe Watercourse – River Condition Assessment
- Appendix 5 – Westhorpe Watercourse – BNG on-site Technical Note
- Appendix 6 – Westhorpe Watercourse – Feasibility Assessment
- Appendix 7 – VSC Update
- Appendix 8 – Updated drawing register and plans pack

Appendix 9 – Building heights schedule
Appendix 10 – The Economic Case for Marlow Film Studios update
Appendix 11 – Film and HETV Publications
Appendix 12 – Lucy Frazer’s speech
Appendix 13 – Neale Coleman CBE letter of support.

2.28 A further submission of additional information was received in September 2023, comprising:

- Supplementary Transport Assessment (STA)
- Preliminary Ecological Design Strategy
- Environmental Statement of Conformity
- Marlow Film Studios – “At a Glance”

2.29 The Supplementary Transport Assessment provides further information on: detailed internal site layout matters; parking; transport modelling and surveys; and, updates to the sustainable travel strategy/travel plan. It also provides a detailed mitigation package including the introduction of traffic signals and signalised pedestrian crossings at Westhorpe Interchange. The Preliminary Ecological Design Strategy sets out a high-level strategy for the delivery of ecological enhancements. Marlow Film Studios – “At a Glance” provides an overview of the project and the benefits that would be secured through the grant of planning permission.

Environmental Statement

2.30 The application includes an Environmental Statement (ES) as required under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The ES provides an overview of the likely environmental impact of the proposals and assesses “likely significant effects” with a summary of mitigation measures proposed and contains a methodology for assessing the significance of the environmental effects and the cumulative impact. Buckinghamshire Council issued an ES Scoping Opinion in November 2021 to inform the preparation of the ES.

2.31 A series of technical chapters within the ES consider the range of environmental factors. The ES considers each of the following topics:

Non-technical summary
Chapter 1 – Introduction
Chapter 2 – EIA Methodology
Chapter 3 – Existing Land Uses and Activities
Chapter 4 – Alternatives and Design Evolution
Chapter 5 – The Development
Chapter 6 – Development Programme, Demolition and Construction
Chapter 7 – Socio economics
Chapter 8 – Transport and Access
Chapter 9 – Air Quality
Chapter 10 – Climate Change
Chapter 11 – Noise and Vibration
Chapter 12 – Ground Conditions, Contamination and Waste

Chapter 13 – Flood Risk
Chapter 14 – Ecology
Chapter 15 – Historic Environment
Chapter 16 – Cumulative Effects
Chapter 17 – Next Steps
Volume 3 – Landscape and Visual Impact Assessment (LVIA)

- 2.32 An Addendum to the ES was submitted in March. This includes additional environmental information to address the environmental effects of minor amendments to the submitted scheme, including changes to landscaping, access arrangements (four-arm roundabout junction), alterations to the bridge crossing between Plots 4 and 5, and amendments to the proposed public art installation. This includes ES information regarding the following: Transport (Appendix A), Contaminated Land (Appendix B), Flood Risk / Drainage (Appendix C), Ecology (Appendix D), Bat Report (Appendix E), UK Hab Report (Appendix F), Great Crested Newt Report (Appendix G), Historic Environment (Appendix H and I), LVIA (Appendix J) and replacement Non-Technical Summary.
- 2.33 In June 2023 further information was submitted for both Transport and Access and Ecology. An ES Statement of Conformity has been submitted to confirm that the relevant effects assessed within the original ES and subsequent ES Addendum remain unchanged. The Addendum Environmental Statement of Conformity includes the following additional documents:
- Annex 1 – Transport Assessment Addendum 2
 - Annex 2 – eDNA Technical Note.
 - Annex 3 – Preliminary Roost Assessment – trees within norther extension.
 - Annex 4 – Updated UK habitat Classification Report.
 - Annex 5 – Replacement of Environmental Statement non-technical summary.
- 2.34 The September 2023 submission included an Environmental Statement of Conformity to confirm that the likely significant environmental effects reported within the Environmental Statement, Environmental Statement Addendum and previous Statement of Conformity (June) remain unchanged.

Community Engagement and Public Consultation:

- 2.35 The applicant advises that they have engaged with the Public since July 2021. Public engagement has included:
- Two key groups were formed:
 - o Community Liaison Group of local stakeholders; this group made up of 41 members met 7 times up to May 2022.
 - o Close Neighbours Forum was set up with nearby neighbours and met 3 times.
 - Four stages of engagement
 - 36+ days of exhibitions
 - 11000 newsletters delivered in person (with over 11000 delivered digitally)
 - Website created

2.36 It is reported that a wide variety of groups were consulted, including cultural groups, local educational institutions, community groups including football clubs and residents associations, local business groups and local recreational and local amenity groups. It is understood over 1000 people engaged with the public consultation and over 200 feedback forms were received.

3 Relevant Planning History

3.1 The site is situated on the former parkland historically associated with and in the setting of Westhorpe House, a prestigious listed building (Grade II) immediately outside the site boundaries but effectively surrounded by it on 3 sides.

3.2 From 1960s to the 1990s, the site and surrounding land was mined for sand and gravel and backfilled with waste (or left to form lakes) and restored. There is still an extant permission covering some of the site and nearby site - Review of Old Minerals Permissions (ROMP) ref WR/2784/61. The extent of the ROMP can be seen in Appendix G.

3.3 A Scoping Opinion pursuant to Regulation 15 of the Town and country Planning (Environmental Impact Assessment) Regulations 2017, was provided by Buckinghamshire Council in November 2022, Ref 21/07371/CONSU.

Adjoining / nearby site history

3.4 The Marlow Football Club applications:

05/07748/FULEA- Application for the provision of new community football facilities for Marlow Football Club including: floodlit football ground including part covered terraces and 500 seat stand with attached building accommodating two storey club house, changing and community facilities and administrative office; new floodlit all weather and training pitch together with 157 standard car parking spaces and new access road with new junction to Marlow Road, and landscaping. This was refused by reason of:

- Inappropriate development in the Green Belt. No very special circumstances demonstrated that would clearly outweigh proposal.
- Loss of trees and hedgerow.
- Harm the rural character, quality and amenity of the area. Enclosure of an open landscape and at variance with other open parcel of land in the area. Visual impact on landscape.
- Contrary to planning guidance for the Little Marlow Gravel Pits area and long term objectives of establishing a country park.
- Fails to achieve a high standard of design or layout that reflects rural context and reinforce its distinctiveness and character.
- Harmful to the parkland setting of Westhorpe House (Grade II Listed building).
- Lead to an intensification of an existing access at a point where visibility is substandard and would lead to danger and inconvenience.

- Insufficient information to demonstrate that adequate parking and manoeuvring space has been provided.
- Insufficient information to allow the highway, traffic generation and transportation impacts to be assessed.
- Makes inadequate provision for non-car modes of travel.
- Lack of legal agreement to secure matters.

07/07535/FULEA- Application for the provision of new community football facilities for Marlow Football Club including: floodlit football ground including part covered terraces and 264 seat stand with attached building accommodating one storey club house, changing and associated facilities; new floodlit all weather pitch; one grass pitch (not floodlit) together with 124 standard car parking spaces, 8 disabled spaces & 32 cycle spaces & coach standing area, improvements to the access road with new junction to Marlow Road, and landscaping. Refused and dismissed at Appeal by reason of:

- The proposal would cause significant harm to the openness of the Green Belt and to three of the five purposes of including land within it. No very special circumstances exist.
- The proposal would have a significant detrimental impact on the character and appearance of the wider area and there would be some conflict with policy aims.
- The location would mean that there is little sustainability benefit.
- Measures towards the establishment of the country park would be limited.

3.5 The Crowne Plaza hotel was permitted in 2000 under 00/07506/FUL). This is south of the site. This follows on from an original permission for a hotel in 1990 and was considered to be in accordance with planning policy which highlighted this area for a hotel.

3.6 The athletics track and building, east of the site, was permitted in 2012 under 12/06884/R9FUL (the recreational use is considered appropriate in the Green Belt).

3.7 An application 22/08240/FUL for development of a car park to provide 271 spaces, including associated works and improvements to the pedestrian access and cycleway at land to the east of Globe Business Park, Fieldhouse Lane, Marlow (part retrospective), was withdrawn 13 April 2023.

4 Summary of Representations

4.1 The application was subject to the relevant consultation, notification and publicity requirements. An initial consultation was undertaken in June 2022 followed by a second consultation in March 2023, a third round of consultation in July 2023 and a further round of consultation in September 2023.

4.2 At time of writing 3262 comments in support from individuals and from other bodies have been received. A total of 2313 individual objections have also been received.

Dates	Support	Objection
First consultation (22 nd June 2022 – 8th March 2023)	1765 (of these 1207 are standard support letters)	966
Second consultation - amendments received on 9th March 2023 (9 th March – 2 nd July)	729 (2494) (671 (1878) standard support letters)	788 (1754)
Third Consultation – amendments received on 3 rd July 2023 (3 rd July – 25 th August 2023)	537 (3031) (514 (2392) standard support letters)	366 (2120)
Fourth Consultation – additional information received 4 th September 2023 (8 th September – 3 rd October 2023)	231	193
	3262	2313

4.3 All representations received from statutory consultees, non-statutory consultees and other interested individuals, groups and organisations are set out in Appendix A1 of the Committee Report.

4.4 A summary of reasons for support and objection is provided in Appendix A2 of the Committee Report. The key headings in terms of reasons for support and objection are listed below.

Support

Green Belt + very special circumstances exist

Environment and landscape benefits

Highways improvements

Objection

Green Belt and RUR4 conflict

Highways and transport impact

Environment and Landscape impacts

Impact on neighbours / community

Need does not exist

Infrastructure insufficient to support the proposals

5 Policy Considerations

Statutory Duties, Policy & Guidance Statutory Duties

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that applications are determined in accordance with the development plan unless other material considerations indicate otherwise.
- 5.2 Section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 72 requires that special attention is given to the desirability of preserving the character and appearance of Conservation Areas.

The Development Plan

- 5.3 The adopted development plan comprises the Wycombe District Local Plan (adopted 2019), the Wycombe District Adopted Delivery And Site Allocations Plan (2013) and the Buckinghamshire Minerals and Waste Local Plan (2019).
- 5.4 The Local Plan policies relevant to the proposals are listed below:
- POLICY CP1 – Sustainable Development
 - POLICY CP2 – Overall Spatial Strategy
 - POLICY CP3 – Settlement Strategy
 - POLICY CP5 – Delivering Land For Business
 - Policy CP6 - Delivering Land for Business
 - POLICY CP7 – Delivering The Infrastructure To Support Growth
 - POLICY CP8 – Protecting The Green Belt
 - POLICY CP9 – Sense Of Place
 - POLICY CP10 – Green Infrastructure And The Natural Environment
 - POLICY CP11 – Historic Environment
 - POLICY CP12 – Climate Change
 - POLICY RUR4 – Little Marlow Lakes Country Park
 - POLICY DM20 – Matters To Be Determined In Accordance With The National Planning Policy Framework
 - POLICY DM30 – The Chilterns Area Of Outstanding Natural Beauty
 - POLICY DM31 – Development Affecting The Historic Environment
 - POLICY DM32 – Landscape Character And Settlement Patterns
 - POLICY DM33 – Managing Carbon Emissions: Transport And Energy Generation
 - POLICY DM34 – Delivering Green Infrastructure And Biodiversity In Development
 - POLICY DM35 – Placemaking And Design Quality
 - POLICY DM38 – Water Quality And Supply
 - POLICY DM39 – Managing Flood Risk And Sustainable Drainage Systems
 - POLICY DM42 – Managing Development In The Green Belt

5.5 The relevant Delivery & Site Allocations Plan policies are:

- POLICY DM1 Presumption In Favour Of Sustainable Development
- POLICY DM2 Transport Requirements Of Development Sites
- POLICY DM6 Mixed-Use Development
- POLICY DM11 Green Networks And Infrastructure
- POLICY DM13 Conservation And Enhancement Of Sites, Habitats And Species Of Biodiversity And Geodiversity Importance
- POLICY DM14 Biodiversity In Development
- POLICY DM15 Protection And Enhancement Of River And Stream Corridors
- POLICY DM16 Open Space In New Development
- POLICY DM19 Infrastructure And Delivery

5.6 Minerals and Waste plan policies relevant to the proposals include:

- Policy 1: Safeguarding Mineral Resources
- Policy 10: Waste Prevention and Minimisation in New Development
- Policy 25: Delivering high quality restoration and aftercare
- Policy 26: Safeguarding of Minerals Development and Waste Management Infrastructure
- Policy 27: Minimising Land Use Conflict

Local Guidance and other Material Considerations:

5.7 Key policy and guidance documents include:

- Buckinghamshire Council Biodiversity Net Gain – Supplementary Planning Document (SPD), July 2022
- Air Quality Supplementary Planning Document (SPD) March 2020
- Canopy Cover Supplementary Planning Document (SPD) March 2020
- Planning Obligations Supplementary Planning Document (SPD) March 2020
- Wycombe District Local Plan BE2 Hollands Farm, Bourne End and Wooburn Buckinghamshire Development Brief August 2021
- Little Marlow Gravel Pits Supplementary Planning Guidance March 2002
- Wycombe District Landscape Character Assessment 2011 (LCA 26.1 THAMES FLOODPLAIN)
- Local Transport Plan: Buckinghamshire Local Transport Plan 4, (April 2016)
- Buckinghamshire Countywide Parking Guidance (Sept 2015)
- Buckinghamshire LEP Strategic Economic Plan (2016-2031)
- Buckinghamshire Local Industrial Strategy 2019
- Buckinghamshire – Economic Recovery Plan - 2020
- Buckinghamshire Green Belt Assessment (2016)
- Buckinghamshire Green Belt Part Two – Individual Site Assessment (Sept 2017)

Other key material considerations:

5.8 Other key policy documents include:

- National Planning Policy Framework (2021)
- Planning Practice Guidance (PPG)

- National Design Guide (2019)
- Build Back Better: our plan for growth (HM Treasury 2021)
- National Industrial Strategy 2017 and Creative Industries Sector Deal 2018
- The 'Industrial Strategy: building a Britain fit for the future' White Paper was withdrawn March 2023
- Biodiversity and Planning in Buckinghamshire (March 2014)

Emerging Neighbourhood Plan:

5.9 It is understood that Little Marlow PC has commenced the preparation of a Neighbourhood Plan, but it remains in the very early stages and the PC have just designated their Neighbourhood Plan area. At this time the Plan can be given no weight in planning decisions given it is at a very early stage.

5.10 The above policies are used to inform the planning assessment and guide the considerations discussed below. The report will consider the policy context and issues and then consider the other material considerations including the need for the development and an alternative sites assessment.

6 Principle and Location of Development

Wycombe District Local Plan (August 2019):

POLICY CP1 – Sustainable Development

POLICY CP2 – Overall Spatial Strategy

POLICY CP3 – Settlement Strategy

POLICY RUR4 – Little Marlow Lakes Country Park

Wycombe Delivery & Site Allocations DPD (July 2013):

Little Marlow Gravel Pits Supplementary Planning Guidance (SPG) 2002

6.1 Policy CP1 – Sustainable Development, states that the Plan delivers the vision and objectives, and principles for the main places in the district and the policy requires all new development to contribute towards delivering sustainable development by contributing to those objectives and principles.

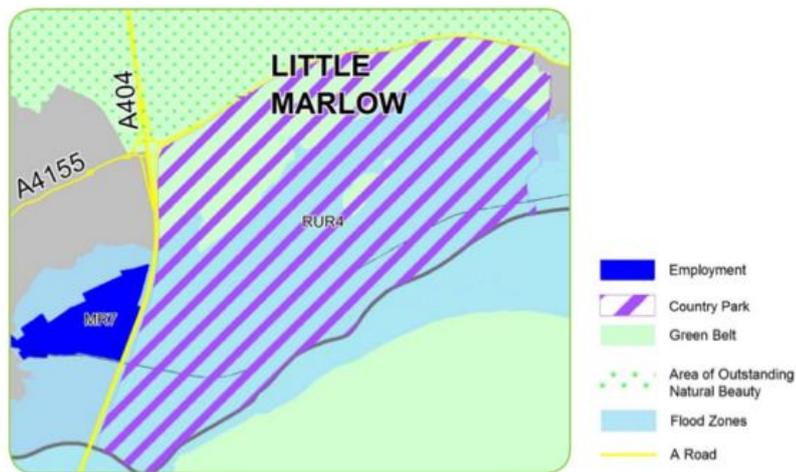
6.2 Policy CP2 – Overall Spatial Strategy, states that the Council will, through the allocations and policies meet the District's growth needs by directing most development to the larger centres and otherwise in accord with the settlement hierarchy and attaching great weight to conserving the landscape and scenic beauty of the AONB and protecting the Green Belt.

6.3 Policy CP3 – Settlement Strategy, sets out how development will be directed within the settlement hierarchy. This includes for Marlow (Tier 2): through developing suitable previously developed land within the built up area, and provision for business through the regeneration of the Globe Park Strategic Employment Area.

6.4 Policy RUR4 – Little Marlow Lakes Country Park, in reference to the Policies Map covers an area of 329ha which includes the application site (area of 36ha). This policy is set out in full, below:

Local Planning Policy RUR4 - Little Marlow Lakes Country Park

- 1 The Little Marlow Lakes Country Park, as defined on the Policies Map, is allocated for outdoor recreation.*
- 2 Any development within the Country Park should provide for environmental improvements, including the provision of publicly accessible open space, ecological and biodiversity enhancements, and contribute to the continued development and long term management of the Country Park.*
- 3 Car parking facilities should be provided in the east side of the Country Park.*
- 4 Planning permission will not be granted for development within the Country Park that that has an adverse effect upon the amenities or setting the River Thames, watercourses, lakes, wet woodlands, adjoining conservation areas, or listed buildings, or which prejudices the function of the area for the purposes of a Country Park.*
- 5 Any development will be required to provide safe, convenient and direct access to Marlow and Bourne End for pedestrians, cyclists, and disabled users.*
- 6 Any development close to an existing waterbody or other wetland feature should protect and enhance that feature's ecological value, biodiversity, and its natural setting within the Country Park.*



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6.5 Furthermore, the supporting text notes that:

- The whole of the area of the Little Marlow Lakes Country Park lies within the Green Belt. Development opportunities are therefore limited. By designating the area a Country Park it further limits development opportunities to those associated with outdoor sport and recreation, as long as it preserves the openness of the Green Belt, that further the purposes of the Country Park.*
- By providing an alternative local Country Park destination, improvements to the Park provide an opportunity to offset the impacts of proposed housing growth at*

Bourne End and beyond on Burnham Beeches – a Special Area of Conservation. On the two strategic sites within this area (see BE1 and 2), where sufficient space to meet Natural England’s requirements cannot be provided on site, a S106 contribution will be sought to invest in the park, and access to it. Further improvements will also be eligible for CIL funding.

- *Any development must take into account the Supplementary Planning Guidance which was produced in March 2002 or any updated guidance that replaces it.*

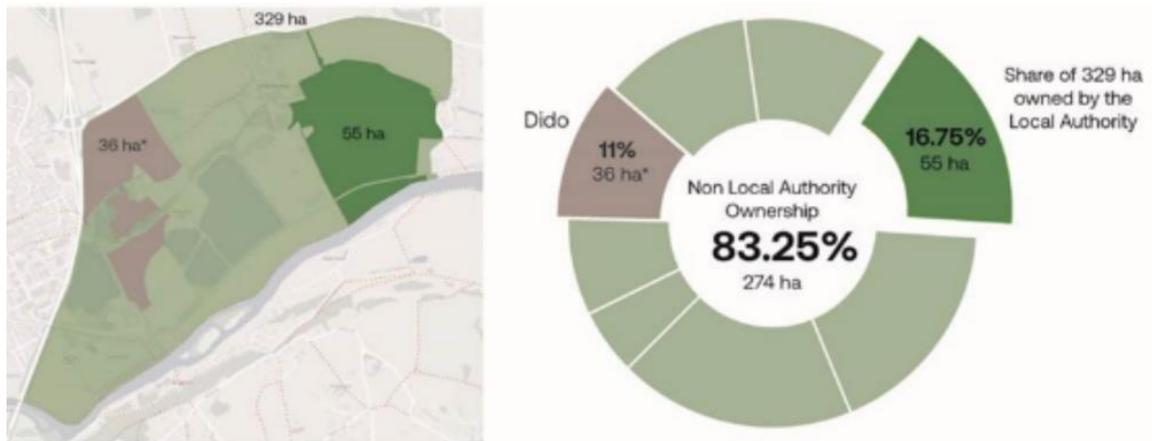
Little Marlow Gravel Pits Supplementary Planning Guidance (SPG) 2002

6.6 In 2002 Wycombe District Council adopted Supplementary Planning Guidance (SPG) for Little Marlow Gravel Pits, which includes a masterplan framework “vision” for the country park. The 2002 SPG recognised that the Council would not be implementing the masterplan directly but would look to work with developers to bring forward the proposal in the context of the existing policy framework and the guidance. Whilst the policy framework has changed, with the adoption of Wycombe District Local Plan in 2019, the SPG still carries weight in planning decisions (until it is replaced with any updated guidance note) and is referred to in supporting text to RUR4.

Designation of Little Marlow Lakes Country Park

6.7 Wycombe Council resolved to designate the land covered by policy RUR4 formally as a Country Park in 2017, but the designation was not completed. In October 2022, a report was taken to Buckinghamshire Council Cabinet to determine an action plan for the area of land covered by planning policy RUR4 which noted: *The area of land to be designated as a Country Park was and continues to be in multiple ownerships, with the Council owning around 16%. For the designation to be effective, working arrangements with the other owners are required, potentially through a Memorandum of Agreement.*

6.8 The pertinent outcomes of the meeting in relation to the consideration of this planning application were that it was agreed to retain a commitment to the whole of the Country Park area, but that the initial phase of delivery should only pursue formal designation of land, as a Country Park, within the Council’s ownership (which, as a minimum should be a Suitable Alternative Natural Greenspace (SANG) compliant facility). *Delivering the smaller area as a first phases would not change the Local Plan allocation and would not rule out the future expansion of the site to cover the whole of the RUR4 area, nor would it rule out improvements to adjacent footpaths to improve accessibility in the area, albeit any additional areas of land to be added would need to be the subject of a future Cabinet decision.*



*Gross land ownership, does not take account of land to be agreed for public access and permissive use.

6.9 This decision was reviewed and endorsed by the Growth Infrastructure & Housing Select Committee in December 2022. The purpose was to review the ability of the Council to deliver a SANG within the constraints of the Cabinet decision on Little Marlow Lakes Country Park. The background to this is that in preparing the Wycombe District Local Plan, the Council needed to demonstrate that developments allocated in that plan, such as Hollands Farm and Slate Meadow in Bourne End, would not have an adverse impact on the National Protected Habitat and Species at Burnham Beeches Special Area of Conservation (SAC). This meant that new developments would need a suitable alternative natural greenspace (known as a SANG) to use rather than increase the recreational impact on Burnham Beeches.

6.10 In August 2021 the Council adopted a Development Brief for Hollands Farm allocation at Bourne End, policy 'BE2' of the Wycombe Local Plan. As part of the Development Brief an Appropriate Assessment was undertaken to satisfy the Council as Competent Authority in consultation with Natural England that residents of the new development would have a SANG to use rather than increase the recreational impact on Burnham Beeches. A list of mitigation measures was identified in the RUR4 area, utilising land within the Council's ownership and the existing rights of way network. Without the proposed SANG (or an alternative), the Holland's Farm proposal could not be secured or delivered.

6.11 The delivery of Holland's Farm housing allocation currently relies on the delivery of a SANG at Little Marlow Lakes Country Park, this includes a long circular route utilising existing paths to the west of the site and improvements to the PROW through the site. The details of the SANG focussed on the Spade Oak lands in the Council's control have yet to be finalised and agreed with Natural England. Assessments are underway to establish potential routes and whether the proximity of the Thames Water Treatment Works would limit the Council's ability to deliver a SANG on the land within the Council's ownership.

6.12 The applicant's planning statement makes specific reference to the legal requirements for designating a Country Park and in the absence of owning the land the Council is unable to act unilaterally and create a Country Park and

considers that it seems most unlikely that the Country Park vision will be realised. The applicant argues that as a consequence of the Council's resolution there is currently no strategy and no clear route for delivering the Country Park over the whole RUR4 area, and because of the contribution to the Council's proposed Country Park and the wider recreational benefits, through public access to a recreational area in plot 4, connectivity improvements, biodiversity net gain, financial contributions, preservation of green infrastructure corridors, recreational uses, café, parking and residents engagement in events, to the RUR4 area, Marlow Film Studios can now be said to be making a net positive contribution towards the RUR4 policy allocation. The applicants are proposing the potential for use of the BNG off site land for country park provision. The contribution to the Country Park is considered as part of the policy compliance assessment (below at 6.13) but it is to be noted that the decision taken by Cabinet does not change the allocation of the land in the Wycombe Local Plan or the protection it affords. Policy RUR4 continues to apply to planning applications as part of the planning process.

Consideration against Policy

6.13 Considering the numbered points of Policy RUR4 in turn:

1. The Little Marlow Lakes Country Park is allocated for outdoor recreation. The proposed use as a film studio, whilst incorporating an area which would be available for some public use, would not be considered an outdoor recreation use. The proposal therefore fails to meet this policy requirement.
2. This criterion requires any development within the Country Park to provide for environmental improvements, including the provision of publicly accessible open space, ecological and biodiversity enhancements, and contribute to the continued development and long term management of the Country Park. Officers accept that the development would provide some publicly accessible open space within Plot 4, c4ha in area. It would also deliver 20% biodiversity net gain through enhancement to be provided off site, but still within the allocated RUR4 area. The off-site BNG Land is c20ha in area to the east of Little Marlow, and could also potentially accommodate public access. This would be secured through the legal agreement which could also secure long-term monitoring and management. On this basis, the development is considered to comply with this policy requirement.
3. This seeks car parking facilities to be provided in the east side of the Country Park. Car parking is currently provided to the east side of the RUR4 area. This proposal would make provision for weekend use of chargeable car parking spaces (60 no.) for the general public. On this basis, the application is considered to comply with this criterion of the policy.
4. Point 4 states that "planning permission will not be granted for development within the Country Park that that has an adverse effect upon the amenities or setting the River Thames, watercourses, lakes, wet woodlands, adjoining

conservation areas, or listed buildings, or which prejudices the function of the area for the purposes of a Country Park.” For the reasons set out in subsequent sections of this report below, the development is considered to be in conflict with the policy. However, the extent of the development at 36ha is not considered to prejudice the function of the entire 329ha allocated country park area, although it would result in the loss of a significant area of land that would otherwise be valuable in enhancing the country park offer to the community.

5. Criterion 5 requires safe, convenient and direct access to Marlow and Bourne End for pedestrians, cyclists, and disabled users. Plans have developed during the course of the application which demonstrate that the accessibility for these users would be improved beyond the current offering. This is considered to be in accordance with the policy.
 6. Criterion 6 requires development close to an existing waterbody or other wetland feature to protect and enhance that feature’s ecological value, biodiversity, and its natural setting within the Country Park. It is considered that the scheme would provide some protection and enhancement of the waterbodies on site, and otherwise provide biodiversity gain to water courses within the RUR4 area. While there would be an urbanising effect on the natural setting of the water body it is considered that there is no significant conflict with this policy requirement.
- 6.14 Whilst it is accepted that the development would enable some of the aims of policy RUR4 to be delivered, the scheme would fail to meet the overall purpose of this policy which seeks to limit development to those uses associated with outdoor sport and recreation, which preserves the openness of the Green Belt, and that furthers the purposes of the Country Park. Furthermore, as a result of failing to deliver on the main purpose of the policy, the development is also considered to conflict with policies CP1 (Sustainable Development), CP2 (Overall Spatial Strategy), and the Little Marlow Gravel Pits SPG. The development results in significant harm which is considered to weigh against the proposals and will be carried forward into the planning balance.

7 Green Belt

Wycombe District Local Plan (August 2019):

POLICY CP2 – Overall Spatial Strategy

POLICY CP8 – Protecting The Green Belt

POLICY DM42 – Managing Development In The Green Belt

- 7.1 Policy CP2 – Overall Spatial Strategy, seeks to protect the Green Belt by only releasing land from the Green Belt where there are exceptional circumstances and by directing development to the larger settlements within the district. Policy CP8 - Protecting The Green Belt, seeks to protect the Green Belt from inappropriate development. Policy DM42 – Managing Development in the Green Belt, states that inappropriate development will be refused unless there are very special circumstances and consistent with the NPPF states that very special circumstances will exist when the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 7.2 The Government’s planning policies set out in Section 13 of the NPPF. The NPPF states that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. There are five purposes of including land in the Green Belt as defined with the NPPF and there is a strong presumption against inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in ‘Very Special Circumstances’ (VSC). The Framework states at paragraph 148 that VSC 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.

Whether the proposal is inappropriate development

- 7.3 Paragraph 149 of the NPPF states that a Local Planning Authority should regard the construction of new buildings as inappropriate in the Green Belt, other than for a number of exceptions. The exception at paragraph 149 g. includes the “limited infilling or the partial or complete redevelopment of previously developed land”. Whilst the land has been subject in the past to mineral works, the definition of ‘Previously Developed Land’ as set out in the NPPF explicitly excludes “... land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures;” On this basis, the development proposal would not fall under this exception and is therefore inappropriate development in the Green Belt. It is recognised by the applicant that the development would constitute inappropriate development.

Impact on Openness Spatial and Visual

7.4 The proposal is inappropriate development in the Green Belt and therefore by definition harmful to the Green Belt. It is also necessary to give consideration to the harm caused to the Green Belt not just by reason of it being inappropriate.

7.5 Although there are both spatial and visual aspects to the Green Belt, the concept of “openness” is a broad policy concept. Openness is the counterpart of urban sprawl and is linked to the purposes to be served by the Green Belt. The PPG advises (Paragraph: 001 Reference ID: 64-001-20190722) that:

“assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to: openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume; the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and the degree of activity likely to be generated, such as traffic generation”.

7.6 The analysis below takes into account this guidance and the following considerations in relation to visual and spatial aspects of openness; such as development size and permanence are relevant.

Spatial impact

7.7 The essential characteristics of Green Belts are their openness and their permanence. The proposals would involve a developed area of some 36 ha with a significant scale of building, roads and infrastructure associated with the film studios and associated uses. Plots 1, 2 and 3 comprising over 22 ha would be entirely developed out with a dense grid of large scale buildings. Plot 4 (area c5ha) would accommodate the Skills Academy but remain largely open. Plot 5 (c9ha) would accommodate a backlot of 2ha to be used outdoor filming with temporary film sets. The site comprises open land of largely rural character. The DAS describes the site as follows: *‘...plots (1,2 and 3) .. are a fairly open landscape of grassland and ruderal vegetation with trees and hedges around the perimeter field boundaries ... plots (4 and 5) have been more extensively colonised by pioneer vegetation. There are mature woodland belts around the perimeters and a mosaic of scrub, grassland and young woodland to the centres’.* Therefore, in terms of the spatial dimension, the proposals because of the scale and extent of development of Plots 1, 2 and 3 would result in a very significant impact on the spatial dimension of openness of the site and the Green Belt in this location resulting in permanent loss, to which substantial weight is given.

Visual impact

- 7.8 The openness and scale of the fields contributes to the wider landscape character and visual amenity of the area, including the setting of the Chilterns Area of Outstanding Natural Beauty (AONB) to the north of the site, appreciated from the adjoining roads and footpaths and the public right of way that crosses the site. There are also views of the site from Winters Hill south of the site, where the development will be seen in the setting of the AONB, and from Bloom Wood north of the site within the AONB where the development will be seen in the context of the scarp slope to the south of the River Thames corridor. There are views from several other locations as demonstrated within the submitted Landscape and Visual Impact Assessment (LVIA), notably from the Volvo footbridge crossing the A404, along the Marlow Road at the northern boundary of the site and from the right-of-way which crosses the A404 at Marlow and runs west to east through the site (refs MAW16/2 and LMA/20/1). The LVIA concludes that there will be residual Major and Moderate adverse effects on a number of these views. In respect of the view from Winter Hill (reported in the LVIA as moderate adverse) the landscape officer considers the impact on views from Winter Hill as 'significant adverse', which accords with the Chilterns Conservation Board (CCB) views. Therefore, in terms of the visual dimension, the proposal because of the scale and extent would result in a substantial visual impact on the openness of the site and the Green Belt in this location.
- 7.9 It is considered that the proposed development will have a profound impact upon the openness of the site, particularly the northern part of the site which will be substantially occupied by large buildings instead of open grassland. Therefore, the proposals, because of their scale and extent, would result in a very significant impact on the visual dimension of openness of the site and the Green Belt in this location, to which substantial weight is given.

Green Belt Purposes

- 7.10 Turning to the five purposes of the Green Belt, as per paragraph 138 of the Framework, these are:
- (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.

Context

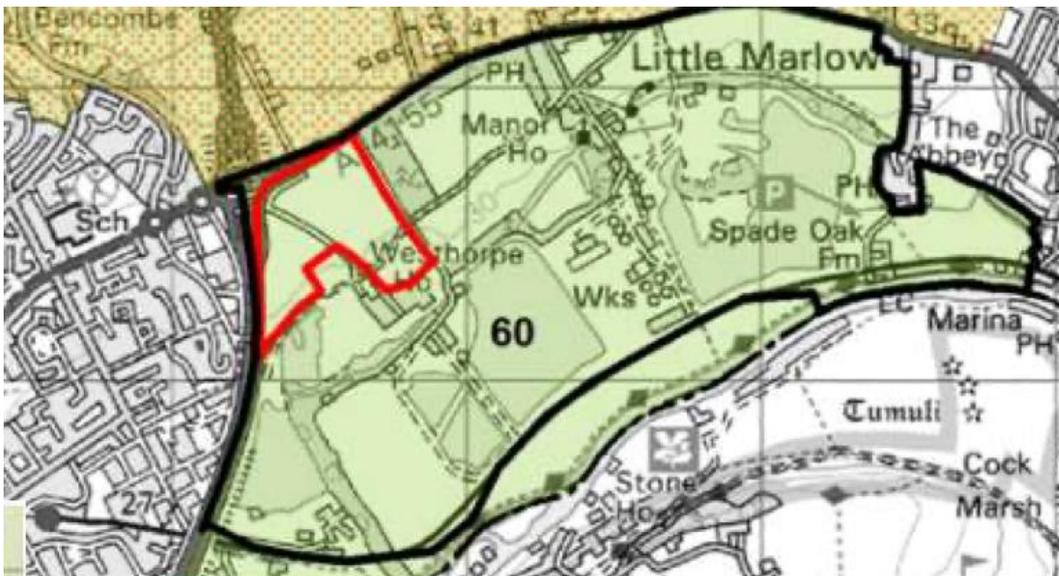
7.11 Background documents to the Local Plan include analyses which help inform the assessment of the impact on openness.

7.12 The Buckinghamshire Green Belt Part 1 Assessment 2016 county wide study considered Green Belt parcels and each was assessed against 4 of the 5 purposes of including land within the Green Belt (a to d, purpose (e) *to assist in urban regeneration ... was not considered*). The site falls within Parcel 60 and the summary of the assessment states:

General Area 60 is low lying land in the Thames basin containing a former gravel pits, the hamlet of Little Marlow, and other fairly frequent sporadic development including the Listed Westhorpe House. It extends between Marlow (to the west) and Bourne End (to the east) the AONB (to the North and the Marlow branch line (to the south). Overall it functions strongly in providing separation between Marlow, Little Marlow and Bourne End and moderately in preventing sprawl. It is also notable that the area is allocated in the Adopted Local Plan (and in the emerging replacement Local Plan) as a new Country Park.

7.13 The Buckinghamshire Green Belt Part 2 Assessment 2017 (Appendix GB1 Individual Site Assessments) considered a site which corresponds to the majority of the application site (Plots 1, 2 and 3) against 4 of the 5 purposes and concluded:

In the opinion of the Local Planning Authority, this site is not capable of removal from the Green Belt and is not otherwise developable. As such, there is no reasonable likelihood of exceptional circumstances to release the site from the Green Belt. The site should not be considered further.



Site BL0001 outlined in red, 21.5 ha in area within Parcel 60.

Purposes of land in the Green Belt and their relevance to the proposed development

(a) to check the unrestricted sprawl of large built up areas;

7.14 Marlow is a principal settlement and a 'large built up area'. The A404 provides a strong Green Belt boundary. The proposal would result in the development of a large site beyond this well-defined boundary and there is clear conflict with this purpose. This is consistent with the Council's Green Belt Parts 1 & 2 assessments. The Part 2 assessment concluded that it would be a clear example of unplanned sprawl. It is considered that the proposals result in significant harm to this purpose.

(b) to prevent neighbouring towns merging into one another;

7.15 The site lies between Marlow and Bourne End, within a Green Belt parcel that maintains the gap between them. The development within this parcel is therefore in conflict with this purpose. Whilst Bourne End is a large village, for the purposes of the Green Belt Assessment it is treated as a town. The area between Marlow and Bourne End already contains sporadic low density development including Westhorpe House, the Park Homes, the athletic track and the sewage works. Little Marlow washed over by the Green Belt is also within the gap. However the development proposed in terms of scale and density is vastly greater than anything that already exists and is in clear conflict with this purpose. This is consistent with the Council's Green assessment.

7.16 The site considered under the Part 2 site assessment (21.5ha), broadly corresponding to the northern part of the proposed development site (Plots 1 – 3). The assessment score is 3 out of 5 in terms of how strongly it contributes to this purpose. The application site (36ha) is 50% larger (filling more of the gap) albeit it is noted that Plot 4 (the skills academy) and Plot 5 (Backlot) accommodate a lesser scale and density of development than Plots 1 - 3.

7.17 The development abuts the Marlow Road, A4155 where the proposed access to the site via a new roundabout is located. Travelling along this road the scale and extent of proposed development will be seen and will obviously diminish the open countryside character and the green gap particularly between Marlow and Little Marlow. It is considered that the proposals result in significant harm to this purpose.

(c) to assist in safeguarding the countryside from encroachment;

7.18 The proposed development would result in a significant scale of urbanising development that will encroach onto open land, the existing character of which is largely rural and open, and separated from the well-defined edge of Marlow. There is clear conflict with this purpose, and this is consistent with the Council's Green Belt assessments.

7.19 The Part 2 assessment noted that *this parcel is absent any apparent built form and although there is clear sense of proximity to Marlow and the associated road network the existing character of the land is largely rural and open, divorced*

from Marlow by the bypass. The development's proximity adjacent to the A404 and Marlow town mean that it would be perceived as the sprawl of Marlow and encroachment into the adjacent countryside, this will be particularly apparent from the clearly defined views of the site from Winter Hill and Bloom Hill. It will also be apparent from the Volvo footbridge, the right of way and from the A404 and Marlow Road.

7.20 The applicant argues that the contribution to this purpose, should be awarded a score of 2 rather 3 /5 arguing that the Council's Green Belt Part Two– Individual Site Assessment (Sept2017) *'appears to be desk based and does not have regard to the damaged nature of the land (spoil and rubble), the aural disturbance or 'Dogs Best Friend' dog day care business and .. not consistent with the council's overall assessment that the Site and wider area has a 'semiurban character'*. It is to be noted that the Part 2 Assessment was not solely desk-based and includes photographs to support the conclusions. It is clear that the historic use of the site has little or no bearing on its open, rural character or its contribution to this purpose. It is not clear why the sound of animals would have any significant bearing on the assessment. The Part 2 assessment clearly distinguishes between character of the parcel *'the sporadic development in GA60 results in an overall semi-urban character'* and the site, *'existing character of the land is largely rural and open'*, and there is not considered to be any inconsistency.

7.21 It is considered that the proposals result in significant harm to this purpose.

(d) to preserve the setting and special character of historic towns;

7.22 The historic centre of Marlow is a significant distance from the Site and visually and spatially separated by the suburbs of Marlow, which includes Globe Park Industrial Estate and the A404. The Green Belt Assessment (2016) identifies Parcel 60, as making no contribution to preserving the setting and special character of historic towns. This is echoed in the Green Belt Part Two – Individual Site Assessment (Sept 2017), which also gave the Site a score of zero.

7.23 It is not considered that there is any significant conflict with this purpose.

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land;

7.24 The applicant argues that the sequential test has demonstrated that there are no alternative urban sites and Marlow Film Studios cannot be disaggregated, therefore, there is no conflict with this policy purpose. However the Council's assessment undertaken by LSH advises *'... the wider economic and production industry benefits apply either to one large facility or a collection of smaller studios within a locality'...* *'We consider it highly likely that any development of this scale will be phased in order to test concept. The development is designed to allow clusters to stand alone which would facilitate this. The critical mass justification does not stand in this scenario.'*

- 7.25 While it is accepted that there could be ‘critical mass’ benefits to support the scale of the development in this location, given the variations in scale in the way the film production industry operates more widely, it is not accepted that this scale is essential to the extent that there is no conflict with this purpose. The economic section below will address this further.
- 7.26 The applicant also states that Marlow Film Studios, whilst not removing the landfill from the site, would regenerate the land and bring the site back into productive use *‘due to the historic quarrying and landfill activities on the Site, it currently has a despoiled appearance with no prospect of further restoration or alternative use such as agriculture ...’*. It is considered that this argument on the visual qualities of the land is not relevant to the consideration of development proposals against this purpose, which is to avoid inappropriate development within the Green Belt. It is considered that the proposals conflict with and result in definitional harm to this purpose.

Green Belt Summary

- 7.27 In summary, the proposed development would constitute inappropriate development which by definition is harmful to the Green Belt and would result in very significant spatial and visual harm to the openness of the Green Belt. The proposals would result in significant loss of open countryside and be in conflict with the fundamental purpose of the Green Belt policy, ‘to prevent urban sprawl by keeping land permanently open’. In addition, the proposals would lead to a conflict with four of the five Purposes of including land in the Green Belt resulting in significant harm to purposes a), b), and c) and considerable harm to purpose e). This harm is afforded substantial negative weight. The proposal would be contrary to local development plan policies CP1, CP2, CP8, DM42 and RUR4. The NPPF states at paragraph 148 that ‘very special circumstances’ (VSCs) 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. The applicant has put forward VSCs. These and other material considerations are addressed later in the report as part of the ‘Weighting and Planning Balance’.

8 Economic

Wycombe District Local Plan (August 2019):

POLICY CP2 – Overall Spatial Strategy

POLICY CP3 – Settlement Strategy

Policy CP6 - Delivering Land for Business

POLICY CP7 – Delivering the Infrastructure to Support Growth

DM28 – Employment Areas

Delivery and Site Allocation Plan 2013

DM19 - Infrastructure and Delivery

Other material considerations

Build Back Better: our plan for growth (HM Treasury 2021)

National Industrial Strategy 2017
Creative Industries Sector Deal 2018
Buckinghamshire LEP Strategic Economic Plan (2016-2031)
Buckinghamshire Local Industrial Strategy 2019
Buckinghamshire – Economic Recovery Plan 2020
Strategic Vision for Buckinghamshire (2021)
Buckinghamshire Local Skills Report (2022)
Opportunity Bucks – Succeeding for All (2022)
BFI Skills Review (2022)

- 8.1 Policy CP2 – Overall Spatial Strategy, seeks to meet the District’s need for housing and employment land while protecting the Green Belt. CP3 - Settlement Strategy, directs development to Marlow and Bourne End (Tier 2 Settlements) through developing suitable previously developed land within the built up area. CP6 – Delivering Land for Business, addresses the needs of the local economy including encouraging a range of development proposals for employment on new and existing employment areas. CP7 – Delivering the Infrastructure to Support Growth, states that provision will be made for new infrastructure to support growth, through planning obligations, CIL and other available funding and that development will be required to provide or contribute towards delivering key infrastructure including achieving better sustainable travel to secure modal shift, improved walking and cycling provision, green infrastructure, community and healthy living provision.
- 8.2 DM28 – Employment Areas, the policy relates to designated Strategic Employment Areas.
- 8.3 DM19 - Infrastructure and Delivery, the policy reflects CP7 requiring the provision where development will create a need, to be made for additional or improved infrastructure.
- 8.4 The NPPF places significant weight on the need to support economic growth through the planning system. Paragraph 81 states that: *“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”*
- 8.5 Paragraph 82 of the NPPF places emphasis on the need for a clear economic vision and strategy which positively and proactively encourages sustainable growth, with regard given to Local Industrial Strategies. Paragraph 83 goes on to recognise that there are specific locational requirements for different sectors and that planning policies and decisions should make provision for clusters of, amongst other things, creative industries.

8.6 The NPPF references the Government's Industrial Strategy, which promotes five key areas to boost the productivity and earning power of people throughout the UK. The Creative Industries, a group of sectors which includes film, are part of the pillars within the Industrial Strategy. Government policy targets growth in this sector requiring substantial increases in studio capacity and skills.

Local Strategies

8.7 The Buckinghamshire Local Industrial Strategy (2019) identifies Pinewood and the wider creative and digital sector as one of four priority economic assets. The Buckinghamshire LEP Economic Recovery Plan (2020) emphasises the role of these assets in driving recovery and with respect to the creative and digital sector states *"An important strand and future strength of economic recovery is to build upon these assets with a target of being at the forefront of screen-based production particularly for the growing streaming sector."* Specific reference is also made to supporting opportunities for new studio development, including those proposed in Marlow.

8.8 The Strategic Vision for Buckinghamshire (2021) emphasises the importance of a thriving economy, with opportunities for businesses and individuals. It talks of employment creation, training and investment in skills and emphasises the role of key sectors with an aim to "capitalise on our specialisms and economic hubs to grow our economy in MedTech, space, high-tech engineering, creative industries, energy and carbon reduction and food processing."

8.9 The Buckinghamshire Local Skills Report (2022) states that Buckinghamshire has a larger than average digital sector, with 1.3 times as many people working in the sector locally than the national average. It further makes reference to the importance of the film and television (local priority sector) to the county *The West of London Screen Cluster is experiencing a period of significant growth, with at least 40 new sound stages expected to become operational over the next two years* - and the potential for employment creation through the Marlow proposals. It also highlights skills shortages within the sector.

8.10 The Buckinghamshire Local Enterprise Partnership (LEP) Local Industrial Strategy places substantial emphasis on, and support for, the creative industries. The National Film and Television School, in Beaconsfield, is recognised as a centre of excellence for film and TV production in Buckinghamshire. The Creative and Digital sector in Buckinghamshire is identified within the LEP's ambition for growth. The Buckinghamshire Strategic Vision, produced by the Buckinghamshire Growth Board, sets out the ambition for a thriving, resilient and successful county. Specific reference is made to the role of Buckinghamshire's growth sectors in underpinning this and the aim to capitalise on existing specialisms and economic hubs, of which the creative sector is one.

8.11 Film and television is identified as a growth sector by the Buckinghamshire Local Enterprise Partnership (LEP) and their recovery plan notes the importance of building on the existing assets so that it can be at the forefront of future growth.

The LEP wishes to work to consolidate a global creative industries capability and further support exporting and inward investment in the film and HETV sector. Buckinghamshire Skills Hub believe that film and HETV can play a leading role in providing employment and upskilling local residents over the coming decade.

- 8.12 In response to the government's Levelling Up White Paper, Opportunity Bucks – Succeeding for All (2022) is a new programme aimed at addressing disparities across the county and ensuring that all residents have access to a good quality of education, skills, employment, health and living standards. The programme will be focusing on wards in Aylesbury, Chesham and High Wycombe. Opportunities for skills development, employment and career progression as offered through the film studios development, particularly given the proximity to High Wycombe, would help support the levelling up agenda.?????

National Strategies

- 8.13 The UK government National Industrial Strategy 2017 sets out several objectives with the aim of helping businesses to create better, higher-paying jobs, and boosting productivity. The UK's creative industries is referred to as a "word-class" industry that was growing at twice the rate of the whole economy. The film and television sector is one of the UK's most dynamic creative industries. The Creative Industries Sector Deal 2018 aim is to support the growth of the creative industries by increasing exports of this sector, sustaining rapid growth, and boosting jobs.

- 8.14 The *Creative industries sector vision: a joint plan to drive growth, build talent and develop skills, June 2023* sets out the Government's vision for maximising growth, nurturing young people's talent and delivering on the creative potential that exists right across the country. *By 2030 - working with industry - we plan to grow these industries by £50 billion of gross value added and support a million extra jobs with a pipeline of talent and opportunity for young people.*

- 8.15 In the Spring Budget (2023), the Chancellor of the Exchequer recognised that the creative industries sector is of strategic importance in the UK economy and the government proposes to continue with tax incentives to encourage investment in the sector. In a May 2023 speech the Culture Secretary, Lucy Frazer, announced a target for the British creative sectors to grow by an extra £50 billion in value by 2030 creating a million extra jobs all over the country by 2030. Reference is made to harnessing talent in clusters across the UK and she states "*support cannot be at the expense of London or detract from those places that are already thriving.*"

Economic Case - Need

- 8.16 The applicant's Economic Case (Volterra) sets out the value of the film and television sector in UK in terms of employment and generating economic activity. It states that film and TV studios in the UK have struggled to meet demand for production space in recent years. *There is acknowledged to be a severe shortage of*

studio space in the industry and only 31% of UK studio stage space is in purpose-built film studios suited to major film and TV drama productions. It states that the West London Cluster is the only place in the UK that competes on a global scale – with Hollywood, Vancouver, and Budapest - and can attract the highest budget productions and that the rest of the UK does not provide the ecosystem of skills, infrastructure, capabilities, reputation, and facilities for major films. West London is the dominant location for high-end producers and the growing market for television.

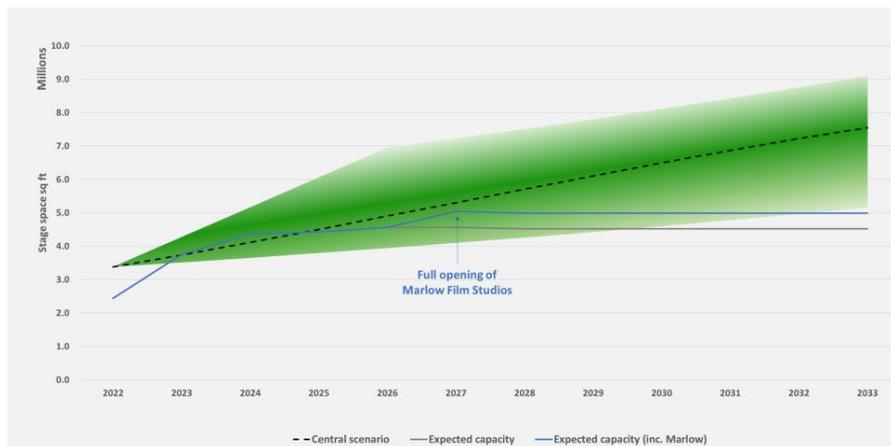
8.17 Volterra state that supporting and building on existing clusters forms a key Government objective in order to deliver future economic growth. They argue that as global competition heightens, and with the uncertainty caused by Brexit and COVID-19, it is even more important that we nurture and invest in our strengths. *WLC has existed for almost a century, since Shepperton Studios and Ealing Studios opened in 1931 and Pinewood Studios in 1936 along with several others in the following decades which has seen the cluster flourish. Between 2015 and 2020, London produced over double the amount of blockbusters compared to the second largest film cluster, Atlanta. Nearly four fifths (79%) of the country's turnover in film and HETV and 70% of companies are concentrated in London and the South East.*

8.18 The study notes that expansions of Pinewood and Shepperton and several other new studios in and around London will make a significant contribution to the need for new space but stated that *'due to the steep trajectory of growth, there is demand for more studios beyond what is currently in the pipeline, particularly for purpose-built space'*. It is acknowledged within the Volterra report that there is uncertainty as to the requirement for space in the UK and studies by others are cited:

- Lambert Smith Hampton estimated 2.3m sq ft of stage space could be required by 2033,
- Saffrey Champness 2.6m sq ft by 2025,
- CBRE at least 2m sq ft in active demand in the market, and
- Knight Frank up to 6m sq ft.

8.19 In estimating the demand or need for space the starting position is current supply. The estimates of supply cited are: approximately 6m sq ft (Knight Frank) and 5.4m sq ft (Lambert Smith Hampton (LSH) comprising around 4.2m sq ft of dedicated film and TV, as well as at least an additional 1.2m sq ft in a variety of alternate spaces for studio use). Volterra argue that London and the South East dominate UK film and HETV production, and this is not disputed. In estimating how much of the UK stage space is within the South East they quote an LSH 2021 study *LSH estimate that over 60% is concentrated in the South East*. They then go on to state that research found that there is just over 2.4m sq ft of stage space in the West London Cluster (WLC) noting that this figure only includes studios with total stage space over 40,000 sq ft, *as, based on the experience of the project team, this is the minimum required to host a feature film or HETV show.*

8.20 Volterra provide their own projections and set out three scenarios of future need in 2033 for the South East: Low scenario 5.2m, Central scenario 7.5m and High scenario 9.1m sq ft. The conclusion is that even in the Low scenario, there would be an unmet need for space. It is stated: *Even under the lowest forecast taking into account the pipeline and Marlow Film Studios, over 175,000 sqft of extra stage space would still be required to meet demand by 2033.*



Volterra: Figure 3 and 28 Studio space forecasts in the WLC to 2033

8.21 Volterra’s projections of need are for the most part significantly greater than the other studies cited. Officers also note that from Volterra’s analysis, for the Low scenario there would be no shortage of space until 2029, i.e. the current pipeline would be sufficient to meet demand.

8.22 Volterra consider three factors in deriving their estimates for the supply in the WLC:

- Existing supply: 2.4 m (sq ft) which sets the baseline for growth projections.
- Expected supply, 2033: 4.5m (sq ft) based on an estimate that only 2.1m of a pipeline of 3.8 m will come forward (calculated as 2.4 existing + 2.1 pipeline).
- Total required stage space, 2033: 5.1 / 7.5 / 9.1 m(sq ft) based on different growth scenarios.

Assumptions	Low	Central	High
Existing supply (sq ft)	2.4 m	2.4 m	2.4 m
Expected supply, 2033 (sq ft)	4.5 m	4.5 m	4.5 m
Total required stage space, 2033 (sq ft)	5.2 m	7.5 m	9.1 m
Shortage of stage space, 2033 (sq ft)	650,000	3.0 m	4.6 m
Shortage of stage space once Marlow FS is operational	175,000	2.6 m	4.1 m

Volterra: Table 5 Supply and demand

LSH
4.1m
6.2– 7.95m median 7.075 m
5.2 – 7.5m, median 6.35 m
0
N/A

LSH comparative figures

8.23 The Council commissioned advice from Lambert Smith Hampton (LSH) to review the Volterra case. In terms of existing supply, LSH take issue with the 2.4m sq ft starting position, and advise total sound stage accommodation across the

wider South East market is circa 4.1m sq ft, albeit noting that this includes schemes with less than 40,000 sq ft (excluded by Volterra) and is assessed across a wider geographical remit than the WLC as defined for the purposes of the application. LSH advise that the exclusion of those schemes with stage provision of less than 40,000 sq ft on the assumption that they are incapable of servicing the progressive HETV section of the market, is questionable *'many of the smaller studios such as Twickenham, West London and Ealing have been at 90%+ occupancy in the last few years almost exclusively from HETV'*.

- 8.24 In terms of expected supply LSH consider the adopted position (4.5 m sq ft) to be materially too low, and advise that the supply pipeline in the South East is nearly 7m sq ft. They do not give a figure as to how much of this is likely to come forward but do advise that 2.23 m sq ft has planning approval, 1.93m sq ft is proposed in live planning applications, 1.28 m sq ft is yet to be formally progressed, and the details of 1.56 m are not in the public domain. Adopting the same proportion as Volterra (that only 2.1m of a pipeline of 3.8 m will come forward ie: $(2.1/3.8 = 55\%)$ this would result in 3.85m sq ft (7×0.55) coming forward. A more cautious approach would be to accept Volterra's 2.1m pipeline coming forward resulting in 6.2m (4.1m + 2.1m) expected supply. This would suggest that the expected supply would be within the range of 6.2m sq ft (LSH existing supply 4.1 + 2.1) and 7.95m (LSH existing supply 4.1m + 3.85m) as opposed to Volterra's 4.5m sq ft figure.
- 8.25 Turning to demand, in terms of the Low growth scenario, Volterra rely on the PWC 2018 estimate that there was a 940,000 sq ft shortfall of available sound stage accommodation. LSH advise that in the absence of a better starting point, the reliance on this figure does not appear to be an unreasonable starting figure. Volterra's assumptions for demand growth rely upon extrapolating historical trends and LSH advise that this does not seem unreasonable, albeit that inflationary impacts on spend do not necessarily translate into additional stage space requirements.
- 8.26 Volterra's Central Scenario relies upon a growth rate based on the HETV growth rate of the last few years. LSH advise that this growth was unprecedented and based upon corporate strategies *to seize market share the subsequent share price crashes of Netflix, Disney and Amazon and the resultant pressures on expenditure suggest the level of growth in expenditure is unlikely to be sustained.*
- 8.27 Volterra's High Scenario is based upon a starting figure, Knight Frank's estimation of 6m sq ft of additional sound stage accommodation nationally by 2026. LSH dismiss this scenario noting that *'we can only conclude that their estimates are intended to incorporate support space as well'.... 'would suggest that the estimation .. is more promotional than an academic assessment of required space'*.
- 8.28 LSH do not accept that Volterra's projections can be relied upon and conclude that the consensus for unsatisfied demand for stage space is broadly in

the region of 2m sq ft to 2.5m sq ft of stages nationally and accepting Volterra's starting point, a reasonable growth figure is somewhere between Volterra's low and central scenario.

8.29 Therefore the space requirement in 2033, lies somewhere between 5.2m and 7.5m (median 6.35m), and expected supply in 2033, somewhere between 7.09m and 7.95m (median 7.63m). Comparing the median positions indicates that there would be no shortage.

8.30 LSH conclude that *the justification for Marlow Film Studios relies on either the consensus estimates for demand being too low or other sites within the supply pipeline not coming to fruition. We consider the combination of sites recently delivered, sites with planning consent or expansion to existing facilities if all built out to be sufficient to address the majority of unmet demand, particularly if limitations of skilled crews are taken into account.*

8.31 Marlow Film Studios disagree with LSH's conclusions. Their main disagreements relate to 1) LSH's criticism of the High scenario, to which their response is *We .. do not solely rely on the high estimate but think it is sensible to be optimistic to ensure the UK captures the full gains from growth in film and major HETV*, and 2) LSH's contention that the Volterra development pipeline materially underestimates the potential sites likely to come to fruition, to which they respond *The UK is reliant on future space to allow the sector to continue to grow. Speculative developments early on in the planning process should not be relied upon to provide the space the UK needs at this stage, particularly given the consistent underestimation of sector growth that has contributed to the limited existing supply of stage space today.*

8.32 It is noted that LSH dismiss the high scenario starting figure (Knight Frank's estimation of 6m sq ft of additional sound stage accommodation nationally by 2026) as the number is materially ahead of other publicised market estimations of demand, all estimating likely demand over the short to medium term of between 2m and 2.6 m sq ft. In regard to the development pipeline estimate, officers note the applicant's point and have adopted a cautious approach to this in their consideration. It is noted that Knight Frank have recently published a report (UK Film and Television Studios Market Report 2023) and have revised their estimate of space required to 2028 down to 2.6 million sq ft.

Skills & Training

8.33 The Economic case states that the WLC is the only part of the UK that has the critical mass of sufficient resources and competencies, including a vast pool of skills and talent, to accommodate major blockbusters and HETV. *Following the expansions of Pinewood, Shepperton and other studios, Marlow Film Studios is the most sequentially preferable and deliverable Site in the cluster that is capable of delivering this scale and quality of space.* There is acknowledgment of the skills shortage to service the film and TV sector which is a priority for investment. The

proposals include the Marlow Film Studios Culture and Skills Academy on site, 11,700 sq ft, and will provide a platform to deliver educational, skills, recreation and cultural resources.

- 8.34 A Skills and Workforce Development Plan is provided. This includes S106 commitments to providing an apprenticeship/training programme providing at least 30 new training places per year for a period of 10 years; bursaries of £525,000 (£105,000 per annum) for a period of 5 years, to support new employees in progression of their careers in the film industry; and appointing a part time scheme co ordinator for a maximum period of ten years. There is a commitment to work with local schools at both primary and secondary level, building awareness about the career opportunities in the industry to working with leading educational institutions, including Buckinghamshire New University and the National Film and TV School.
- 8.35 LSH advise that the biggest barrier to inward investment targets is likely to be a shortage of available crew to facilitate the forecast production demand, citing the shift in focus by the British Film Commission and British Film Institute from addressing a lack of sound stage supply to focusing on the crew position and the subsequent need for skills based education and training. *We see the current shortage of crew provision as a more significant barrier to maximising production opportunities than availability of studio infrastructure.* LSH advise that as the supply pipeline is built out, occupier demand will be limited as much by a lack of crew to service them as global demand to make productions. *Fundamentally, the case for increased sound stage development is flawed if crew availability is unable to service the new stages.*

Economic benefits

- 8.36 Volterra in their report set out the benefits arising from the development, which would support the growth in the film and TV sector. The Council's Economic Growth & Regeneration Team concur that the proposed Marlow Film Studios will support the creative and cultural sector, a key economic asset for Buckinghamshire. It will bring investment and employment to the county and will support local strategic economic ambitions around growth sectors, employment creation and skills development.
- 8.37 The Economic Case for Development forecasts that there will be an average of 2,490 construction jobs on-site throughout the construction period. In the operational phase, it suggests between 1,780 and 2,415 FTE jobs will be created across a broad spectrum of job types increasing to 2,105 to 2,735 including part time jobs. In addition to the employment to be directly created by the film studios, it is estimated that between 1,120 and 1,520 indirect FTE jobs will be created.
- 8.38 The Environmental Statement (ES) overall assessment is that the development is expected to lead to no significant adverse effects. Moderate and major positive/beneficial effects identified are:

- Local jobs and skills (moderate beneficial) – the Applicant has committed to a world-class employment and skills programme aimed at upskilling the district’s existing and future population. The programme also aims to address ongoing skills issues in the important film and TV sector; and
- Contribution to film and HETV (major beneficial) – the studio space brought forward as part of the Development is expected to provide a great boost to the ability of the West London Cluster (WLC) and therefore the UK to host major feature films and HETV shows. This will improve the overall national performance in the sector, capitalising on high global growth rates in the sector

8.39 The Economic Development officer advises the proposed Marlow Film Studios represents a significant investment in one of Buckinghamshire’s key economic sectors and supports the delivery of the aims and ambitions of local economic strategies. They advise that it creates a number of employment opportunities, offers opportunities for entry into, and progression within, the film and high end television sector; offers opportunities for local young people to engage with the sector and to consider, and take advantage of, opportunities that might not otherwise be available; and it supports local businesses, the tourism sector and an increase in GVA.

8.40 They also advise that traditionally, unemployment in Buckinghamshire has been relatively low and consistently below regional and national averages. The Covid-19 pandemic resulted in a significant increase in unemployment levels locally, and whilst the current claimant count is on a downward trend, it still remains higher than pre-pandemic levels and there remains a need for new employment opportunities to be created across Buckinghamshire.

8.41 There are skills shortages and recruitment challenges in the construction and creative sectors locally (and nationally), and it is to be accepted that the development would need to rely on workers from outside of the county. The Economic Growth Team advise that the efforts proposed in the Skills and Workforce Development Plan to try and address these challenges, and thus support local opportunities, are essential. The provision of a dedicated space onsite, the Culture and Skills Academy, to be available to local organisations to deliver education, skills and cultural programmes and activity is welcomed.

8.42 There is a significant amount of expenditure associated with the construction and operation of the film studios. The Economic Case for Development forecasts the development would generate between £130m - £155m of production expenditure for businesses in the West London Cluster (including Buckinghamshire) each year. The Economic Case forecasts that the Studios will generate approximately £338m in GVA each year; support annual tax revenues of up to £105m and increase exports by up to a projected £102m annually.

8.43 The opportunity to visit locations used in film and television is a major draw for tourists. As such, the Marlow Film Studios are likely to encourage increased visits to the county. There would be the opportunity particularly through collaboration with Visit Buckinghamshire to exploit the county's screen heritage in place promotion and to maximise the potential benefits to the tourism sector and local tourism businesses.

Justification for Proposal - Critical Mass

8.44 The justification for the size of the proposed studios is that it is the optimum critical mass for a best-in-class film studio, which Marlow Studios aspires to be. *The critical mass provided at Marlow Film Studios will allow for multiple films to be shooting at the same time, at different stages in the production process. It is broadly anticipated that there would be scope for three feature films or four major HETV shows, or a combination of both, to be filmed on site each year.* It is stated that the critical mass is driven by a number of factors:

- a. Market Demand – demand is for purpose-built larger facilities.*
- b. Economies of Scale - The need to ensure the co-location of stages with workshops and production offices and the essential array of specialist technicians, trades and crafts people who are necessary to make a modern motion picture.*
- c. Scale of operation to ensure the robust delivery of benefits such as the provision of education/training facilities and creche.*
- d. The need to ensure continuous productions. Local supply chains need a continuous supply of work if the future success of the studio is to be secured.*
- e. A critical mass of personnel on Site to support the public transport offer and ensure the site is sustainable on the long term and the public benefits are sustainable.*
- f. Higher relative output – more jobs, and greater benefits for the economy*
- g. Better land efficiency – less land is taken up on a large purpose-built studio than a collection of smaller studios to produce the same output of production.*

8.45 The Council commissioned advice from Lambert Smith Hampton (LSH) and their assessment is that the greatest justification for critical mass is from an operational efficiency and economies of scale perspective, i.e. profitability. They consider that from a market (demand) perspective, a development of this scale should be phased to test the concept. LSH consider that it is largely true that “size can create and sustain their own ecosystems and microeconomies”, but this would apply to the wider (West London) cluster rather than an individual location. They are not convinced by the argument that larger facilities provide a disproportionate benefit to the sector and wider economy than a collection of smaller facilities within a localised area.

8.46 The applicant's response to these points is to emphasise the wider benefits that a purpose built studio of this scale could provide e.g. improvements to public transport, better education and training opportunities, public amenities, staff

support services. They argue that the critical mass is vital to delivering these benefits.

- 8.47 While economy of scale brings some benefits, and in that sense contributes to the 'case for the proposals', officers consider that this needs to be considered against the impact on the Green Belt.

Justification for Proposal – Alternative Sites Assessment (ASA)

- 8.48 The applicants have prepared an Alternative Site Assessment (ASA) for the purposes of a sequential test approach which concludes that the application site *is the most suitable, sustainable, and available site to deliver the film and TV studio development now*. The original assessment identified 91 potential sites which were narrowed down to 2 sites in the final assessment, and ultimately a conclusion that the proposed site was most suitable. The Council raised a number of queries and in response the amended assessment was undertaken, which identified 126 potential sites narrowed down to 4 sites, with the same ultimate conclusion.

- 8.49 It is noted that the ASA was undertaken to support the case for the proposals, rather than to inform site selection or development parameters, and that a number of the assessment criteria including in relation to 'development requirements' and 'site size' appear to be tailored to the proposals. The justification for 'development requirements' and 'site size' (not changed in the amended ASA) are reliant on 'needs' and 'critical mass' arguments, both of which have been challenged by the Council's consultants LSH. Other criteria e.g. sites must be within 250 metres of a settlement of 10,000 population or greater, are somewhat arbitrary in their specificity.

- 8.50 Had the ASA been tailored to a smaller site / scheme and over a wider catchment area it would likely generate more potential sites. However, in the context of the scheme before the Council for determination, it is acknowledged that available sites of this size within the catchment selected and not within the Green Belt would be limited in supply.

Conclusions

- 8.51 There is a lack of certainty regarding the need for space. However, it is important to note that it is inherently difficult to accurately forecast future studio demand, largely due to the dynamic nature of occupier activity and the immediacy of requirements. This is further complicated on the basis that overall demand is global and is influenced by socio-economic and political factors, as well as wider creative industry factors. There is also a question as to what extent the size of the development 'critical mass', supports the economic case put forward for Marlow Film Studios and the related issue of whether the need could be met less harmfully elsewhere. Permission was granted for the expansion of Pinewood Studios, also in the Green Belt, but in contrast to Marlow that approval was for the expansion of the UK's largest established studios with an existing critical mass of stage space

and supporting industries, which was not footloose. However, notwithstanding these uncertainties the proposal represents a significant investment in one of Buckinghamshire's key economic sectors and supports the delivery of the aims and ambitions of national and local economic strategies. The proposals would create employment and skills and training opportunities and would also support local businesses, the tourism sector and an increase in GVA. The proposals would support the expansion of the successful West London cluster and promote skills development, in line with Government industrial strategy. The provision of purpose-built studios of this scale, would represent a significant economic opportunity given the scale of ambition the Government is now advancing in respect of the TV / Film sector. Critical to realising these opportunities, would be the proposed Skills and Workforce Development Plan and which is to be secured as part of a consent. The economic benefits are significant and can be afforded significant weight in the planning balance.

9 Landscape

Wycombe District Local Plan (adopted 2019)

POLICY CP7 - Delivering the Infrastructure to Support Growth

POLICY CP9- Sense of place

POLICY CP10 – Green Infrastructure And The Natural Environment

POLICY RUR4- Little Marlow Lakes Country Park

POLICY DM30 – The Chilterns Area Of Outstanding Natural Beauty

POLICY DM32- Landscape Character and Settlement Patterns

POLICY DM34- Delivering Green Infrastructure and Biodiversity in Development

POLICY DM35- Placemaking and Design Quality

Delivery And Site Allocations Plan (2013)

POLICY DM11- Green networks and infrastructure

Wycombe District Landscape Character Assessment 2011

- 9.1 Policy CP9 seeks to conserve the natural and historic environment and require development to achieve a high quality of design that improves the character and quality of place. Policy CP10 seeks to protect the Chilterns Area of Outstanding Natural Beauty (AONB) from harmful development and to take a landscape character based approach to considering proposals.
- 9.2 Policy DM20 seeks to ensure that development within the setting will not have a significant adverse impact on the natural beauty of the Chilterns AONB.
- 9.3 Policy DM32 requires development to protect and reinforce the positive key characteristics of the receiving landscape and existing settlement pattern including positively responding to views and vistas both from within and towards the site, paying particular attention to hilltop and skyline views and areas that contribute to separation between settlements.

- 9.4 Policy DM35 requires all development to improve the character of the area and the way it functions.
- 9.5 DM11 requires the Green Infrastructure Network (GIN) to be conserved and enhanced with special attention to biodiversity, recreation and non-motorised access.
- 9.6 The NPPF at Paragraph 130 c) emphasises the importance of ensuring new developments are sympathetic to local character, including the landscape setting. Paragraph 131 of the NPPF states that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change and that existing trees should be retained wherever possible. The NPPF at paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have (amongst other landscape designations) the highest status of protection and development within its setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- 9.7 The site lies at the northern edge of the River Thames Corridor, where the Royal Borough of Windsor and Maidenhead Local Plan 2013-2033 seeks to conserve and enhance the special character and visual amenity of the River Thames and its setting under its policy QP4.

Landscape character

- 9.8 The site is located within the relatively flat, low-lying Thames Floodplain area characterised by open fields, hedgerows and woodland belts and water bodies associated with the former gravel pits. Marlow's built-up area is immediately to the west beyond the A404 and there are smaller clusters of development, including the village of Little Marlow, dotted along the river valley and around the site. The Thames Path long-distance path runs along the river immediately to the south of the site, whilst the Chilterns Way sits further to the north within the Chilterns Area of Outstanding Natural Beauty (AONB), providing pedestrian and cycle connections and recreational routes.
- 9.9 The Wycombe District Landscape Character Assessment categorises the site area as Thames Floodplain. It draws attention to the important visual relationship between LCA 26.1 Thames Floodplain in which the site lies, and the AONB to the north and LCA 21.1 Thames Valley Slope, to the south. The landscape provides a number of recreational opportunities including the Thames Path, water sports and bird watching. Views are afforded up to the lower chalk dip slope valley sides, across and along the Thames.
- 9.10 The southern part of the site, Plot 5 and parts of Plot 4, fall within the Green Infrastructure Network (GIN) designation identified in the Wycombe Local Plan. Policy DM11 requires the GIN to be conserved and enhanced with special attention to biodiversity, recreation and non-motorised access. The existing Public

Right of Way runs south of Plots 1 and 3 and connects back to Marlow via the existing (Volvo) footbridge over the A404. It is well used as an amenity route as well as a direct link between Marlow and Little Marlow. A permissive path along the west side of Plot 5 provides a link between the footbridge and the Thames Path which runs along the river immediately to the south of the site.

9.11 The northern plots (1,2 and 3) were used as a landfill and are a fairly open landscape of grassland and ruderal vegetation with trees and hedges around the perimeter field boundaries. A row of poplars marks the boundary with the Chilterns AONB, and the combination of a dense native hedge within the site and a row of conifers beyond, screens the eastern boundary along Westhorpe Farm Lane. The southern plots (4 and 5) are adjacent to significant water bodies (flooded former gravel pits) and have been more extensively colonised by pioneer vegetation. There are mature woodland belts around the perimeters and a mosaic of scrub, grassland and young woodland to the centres.

9.12 The northern plots slope from north to south, with a level change of approximately 7m between the Marlow Road and the Public Right of Way. The southern plots are broadly flat and slightly elevated above the surrounding landscape. Plot 1 is surrounded by an earth bund around 1-2m high, whilst a mound of material is present in the northeast of Plot 5.

9.13 The Design and Access Statement explains how the wider landscape context, boundary conditions and near neighbours, combined with existing conditions on the site itself, have informed a number of key considerations which have shaped the development of the landscape masterplan, described as ‘a biodiverse campus, integrated with its landscape setting’. The studio production zones are located on the northern plots (1, 2A, 2B and 3), whilst the more ecologically valuable southern plots (4 and 5) are maintained as predominantly open spaces with existing high-distinctiveness habitats retained. The development is surrounded by landscaped buffers. *These are multifunctional landscapes providing ecological corridors and Sustainable Urban Drainage Strategies attenuation as well as providing separation from near neighbours and screening to long views.*

9.14 The Environmental Statement submitted in support of the application includes a Landscape and Visual Impact Assessment (LVIA). The assessment considers the site to be of medium / low landscape value, to have a low susceptibility to the proposed change brought about by the development and therefore that the overall sensitivity of the site to the development is assessed as low. It is reported that the site is well screened with trees, groups of trees, woodlands and hedgerows. In terms of the character of the site and direct effects, the magnitude of effects on the character of the site is assessed as high. Based on the low sensitivity of the site and high magnitude of landscape effects the overall level of landscape character effects on the site is assessed as being medium and of moderate adverse significance over the medium and long term – as set out in ES Table 1.2 below.

9.15 Mitigation of landscape and visual effects include locating the construction site compound in visually inconspicuous areas making use of existing hoarding along the site boundaries as screening. Lighting would only be installed where absolutely necessary and should be directional to avoid unnecessary light pollution. There are no specific mitigation measures proposed for the operational phase of the proposed development for landscape or visual receptors, however a comprehensive landscape scheme is proposed and is considered as embedded mitigation. In addition there is a comprehensive landscape and ecological management plan proposed to ensure the long term viability and success of the landscape scheme and habitats created.

Table 1.2: Effects of the Proposed Development on Landscape Character

Receptor	Sensitivity	Phase (Years 1- 5)	Magnitude of change	Significance
Landscape Character Area 26.1: Thames Floodplain	Medium	Construction Years 1 – 5 Year 15+	Medium	Moderate adverse Minor adverse Minor adverse
Landscape Character Area 21: Thames Valley Slope	Medium	Construction Years 1 – 5 Year 15+	Medium	Moderate adverse Minor adverse Minor adverse
Landscape Area 9b: Cookham Dean	High	Construction Years 1 – 5 Year 15+	Medium	Moderate adverse Moderate adverse Minor adverse
Landscape Area 9c Winter Hill	High	Construction Years 1 – 5 Year 15+	Medium	Moderate adverse Moderate adverse Moderate adverse
Landscape Area 13b Cookham	High	Construction Years 1 – 5 Year 15+	Medium	Moderate adverse Moderate adverse Minor adverse

9.16 While the site was in use for quarrying and landfilling, with its restoration, the site and its surroundings are now well integrated into the landscape where lakes, woodlands and grassland provide a natural transition between the Chiltern hills and the River Thames corridor. Both character areas benefit from this continuity, where the mosaic of lakes, woodlands and open space add scale and richness to the spatial and visual experience of the wider landscape. The open character of much of the site affords some views to the Chilterns AONB to the north and to the wooded slopes of the Thames Valley to the south, both of which in turn overlook the site. There are public rights of way and permissive footpaths

within the site that enable the public enjoyment of the site, its rich wildlife and the views across it to/from the surrounding landscape.

- 9.17 From the urban landscape of Marlow, heading east, once past the A404 junction, the landscape quickly changes becoming a much more rural and open landscape with the Chilterns AONB on the left and the Thames Valley on the right. This begins a sequence of green gaps between settlements heading eastwards to Little Marlow and Well End / Bourne End.
- 9.18 The proposed development will significantly diminish the open countryside character and green gap between Marlow and Little Marlow, particularly with the presence of a new roundabout adjacent to a series of new buildings accompanied by the loss of many roadside trees. It is noted that the proposed site layout permits the retention of most existing trees and other vegetation, which is generally located at the perimeter of the site, with the exception of the northern site boundary. The proposed development will reinforce and manage these areas. Nonetheless for road users travelling along the A404 views of / across the AONB and the Thames Valley will be obscured by the development and the boundary buffers.
- 9.19 The proposed development is likely to conflict with some of the established recreational uses on the site and on adjoining lands – walking, fishing, and nature-watching . In particular it will urbanise the landscape and views from the public footpath, and informal routes as new buildings will appear as a backdrop to some of the lakes that currently enjoy a wooded setting. The change in character of the site with extent of built form and associated activity of the film studios in close proximity to these recreational uses will contribute to this urbanising effect.
- 9.20 Enhancements to the public footpath running west to east between Plots 1-3 and 4 are proposed. It is acknowledged that the existing landscape experience of this route is variable, but the proposed upgrade will take away the informal and somewhat semi-rural character of this route, instead creating a more ornamental and suburban landscape setting to the proposed buildings. This will be a significant and adverse change to the character of this footpath.
- 9.21 While the LVIA identifies significant adverse effects likely to arise from the proposed development, the landscape officer is of the view that in some instances the landscape effects will be greater and more significant than stated in the LVIA, where in particular the proposed development in the immediate setting of the AONB will cause significant harm to the AONB's landscape character. The Landscape Officer states “ *It is my view that the LVIA goes on to underplay the effects of the proposed development upon landscape character in some instances e.g. minor adverse effects upon the Thames Floodplain, within which the site sits. Given the profound change to the character of the northern half of the site in particular, and the perception of this change from the surrounding areas, I cannot agree that this will be a minor adverse effect*”.

Visual effects

9.22 Views extend northwards across the site to the Chilterns AONB from various parts of the River Thames corridor, especially elevated locations with panoramic views such as Winter Hill and parts of the Chiltern Way (southern loop). The return views from the Chilterns AONB and the Thames Valley Floodplain to the scarp slope south of the river, including Winter Hill, are also distinctive and significant.

9.23 The ES LVIA includes an assessment of the anticipated impacts upon key views of the proposed development within a 3 km study area. These include Bloom Wood, south-west of Flackwell Heath, Thames Path, Winter Hill, Vineyard to the west of the A404, Adjacent to properties south-east of the Site, Westhorpe House and access road, Westhorpe Farm Lane, Marlow Bridge, Pump Lane north, Marlow Road, Pump Lane south, Spade Oak Nature Reserve, A404 Footbridge, Westhorpe Park footpath, North West and West of Little Marlow, Stone House Lane and Spade Oak Reach footpath. A summary of the residual effects on views is provided in the Table 1.4 LVIA March 2023 which sets out the impact during construction, years 1-5 and 15+ years with mitigation in place (residual effect).

Table 1.4: Viewpoint analysis summary

Viewpoint No. and Location	Sensitivity	Phase	Magnitude of change	Significance of effects	Night-time effects
3. Bloom Wood	High	Construction	Medium	Moderate adverse	N/A
		Years 1 – 5	Medium	Moderate adverse	Moderate adverse
		Year 15+	Medium	Moderate adverse	Moderate adverse
4. South-west of Flackwell Heath	High	Construction	Medium	Moderate adverse	N/A
		Years 1 – 5	Medium	Minor adverse	
		Year 15+	Medium	Minor adverse	
7. Thames Path (03)	High	Construction	Low	Minor adverse	N/A
		Years 1 – 5	Low	Minor adverse	
		Year 15+	Low	Negligible	
8. Winter Hill viewpoint	High	Construction	High	Major adverse	N/A
		Years 1 – 5	High	Major adverse	Major adverse
		Year 15+	Medium	Moderate adverse	Moderate adverse
9. Vineyard to the west of the A404	High	Construction	Medium	Moderate adverse	N/A
		Years 1 – 5	Medium	Moderate adverse	Moderate adverse
		Year 15+	Medium	Moderate adverse	Moderate adverse
10. Adjacent to properties SE of the Site	High	Construction	High	Major adverse	N/A
		Years 1 – 5	High	Major adverse	Major adverse
		Year 15+	Medium	Moderate adverse	Moderate adverse
11. Adjacent to Westhorpe House	High	Construction	High	Major adverse	N/A
		Years 1 – 5	High	Major adverse	
		Year 15+	Medium	Moderate adverse	
12. Westhorpe Farm Lane	High	Construction	High	Major adverse	N/A
		Years 1 – 5	High	Major adverse	Major adverse
		Year 15+	Medium	Moderate adverse	Moderate adverse
14. Adjacent to Westhorpe House (02)	High	Construction	High	Major adverse	N/A
		Years 1 – 5	High	Major adverse	
		Year 15+	Medium	Moderate adverse	
15. Westhorpe House Access Road	High	Construction	High	Major adverse	N/A
		Years 1 – 5	High	Major adverse	
		Year 15+	Medium	Moderate adverse	
16. Marlow bridge	High	Construction	Low	Negligible	N/A
		Years 1 – 5	No change	No change	
		Year 15+	No change	No change	
B Pump Lane north	Low	Construction	Low	Minor adverse	N/A
		Years 1 – 5	Low	Minor adverse	Minor adverse
		Year 15+	Low	Minor adverse	Minor adverse
C Marlow Road (01)	Low	Construction	Medium	Minor adverse	N/A
		Years 1 – 5	Medium	Minor adverse	Minor adverse

		Year 15+	Medium	Minor adverse	Minor adverse
D Marlow Road	Low	Construction	Medium	Minor adverse	N/A
		Years 1 – 5	Medium	Minor adverse	Minor adverse
		Year 15+	Medium	Minor adverse	Minor adverse
E Pump Lane south	Low	Construction	Medium	Moderate adverse	N/A
		Years 1 – 5	Medium	Moderate adverse	
		Year 15+	Medium	Moderate adverse	
F Marlow Road (02)	Low	Construction	Medium	Moderate adverse	N/A
		Years 1 – 5	Medium	Moderate adverse	Moderate adverse
		Year 15+	Low	Minor adverse	Minor adverse
G Marlow Road (03)	Low	Construction	No change	No change	N/A
		Years 1 – 5	No change	No change	
		Year 15+	No change	No change	
H Spade Oak Nature Reserve	Medium	Construction	No change	No change	N/A
		Years 1 – 5	No change	No change	
		Year 15+	No change	No change	
I. Thames Path	High	Construction	Low	Minor adverse	N/A
		Years 1 – 5	Low	Negligible	
		Year 15+	Low	Negligible	
J. Thames Path (02)	High	Construction	Low	Minor adverse	N/A
		Years 1 – 5	Low	Negligible	
		Year 15+	Low	Negligible	
K Thames Path (Riverwoods)	High	Construction	Low	Minor adverse	N/A
		Years 1 – 5	Low	Minor adverse	
		Year 15+	Low	Negligible	
L. A404 footbridge	High	Construction	High	Major adverse	N/A
		Years 1 – 5	High	Major adverse	Major adverse
		Years 15+	Medium	Moderate adverse	Moderate adverse
M Westhorpe Park footpath	High	Construction	Low	Minor adverse	N/A
		Years 1 – 5	Low	Negligible	
		Year 15+	Low	Negligible	
N West of Little Marlow (01)	High	Construction	Medium	Moderate adverse	N/A
		Years 1 – 5	Medium	Moderate adverse	
		Year 15+	Medium	Moderate adverse	
O. West of Little Marlow	High	Construction	Medium	Moderate adverse	N/A
		Years 1 – 5	Low	Minor adverse	
		Year 15+	Low	Minor adverse	
Q Stone House Lane	High	Construction	High	Moderate adverse	N/A
		Years 1 – 5	Medium	Moderate adverse	
		Year 15+	Medium	Moderate adverse	
	High	Construction	High	Moderate adverse	
R Spade Oak Reach footpath (01)		Years 1 – 5	High	Moderate adverse	N/A
		Year 15+	Medium	Minor adverse	
S Spade Oak Reach footpath (02)	High	Construction	High	Moderate adverse	N/A
		Years 1 – 5	High	Moderate adverse	
		Year 15+	High	Moderate adverse	

9.24 The assessment demonstrates a significant magnitude of change to selected views. This includes long term detrimental impacts on views from Bloom Hill within the AONB to the North (reported as moderate adverse) and from Winter Hill in the south (reported as moderate adverse). The Landscape Officer does not agree with all of table 1.4 entries and considers that the effects will be greater and more significant than stated in the LVIA.

9.25 Regarding View 3, it is considered that the LVIA has underestimated the magnitude of change and the significance of the effect. The wireline photomontage indicates the extent of the proposed development and the fully rendered photomontage illustrates the scale, density and character of buildings that will be visible from here. This is a major change to the character of this view

where the proposed development interrupts the flow of the landscape from the Chiltern Hills into the Thames Valley and strongly urbanises the middle ground.

9.26 Regarding View 8, the rendered Photomontage 8 demonstrates the extent and visibility of the proposed development which sits between the AONB and the Thames valley in the foreground. The magnitude of change to this view is such that it breaks the sweep of countryside that extends from the Thames Valley up into the Chiltern hills. The development appears as a major extension to the business parks at the edge of Marlow and significantly harms the quality and character of this view. The backlot at Plot 5 lies relatively close to the viewer and will at times contribute further to the harm to this view.

9.27 It is considered that the applicant has understated the sensitivity of the views from the A4155. From the urban landscape of Marlow, heading east, this quickly changes once past the A404 junction, becoming a much more rural and open landscape character with the Chilterns AONB on the left and the Thames Valley on the right. This begins a sequence of green gaps between settlements heading eastwards to Little Marlow and Well End / Bourne End. The proposed development will significantly diminish the open countryside character and green gap between Marlow and Little Marlow, particularly with the presence of a new roundabout adjacent to a series of new buildings accompanied by the loss of many roadside trees. The major adverse effects upon views in the vicinity of the A4155 are illustrated by the updated photomontages C, D, E and F contained in the LVIA and DAS addendums.

9.28 It is noted that the Chilterns Conservation Board (CCB) has concluded that this application is demonstrably harmful to the landscape setting of this part of the AONB and would erode the panoramic view from Winter Hill and would be both striking and jarring in that vista, from which great public benefit is derived. *“A great swathe of land, some green belt and riparian and some AONB would be materially eroded in its visual (perceptual) landscape and in its landscape character and its quality”*. They state mitigation of the impact on the view would not be possible. The National Trust (owner and custodian of the Maidenhead and Cookham Commons, a 65ha are of woodland and wildflower meadows situated south of the River Thames, in which Winter Hill is located), considers that it is not possible to mitigate the impact on views to and from Winter Hill and that the potential harm to the landscape character and setting of Winter Hill which they describe as a renowned beauty spot, whose north facing slopes provide panoramic views towards Marlow, Little Marlow and the Chiltern Hills beyond.

9.29 There are also long term detrimental impacts on views closer to the site, from Westhorpe Lane (reported as moderate adverse) and from the (Volvo) footbridge over the A404 where there is an elevated view across the site (moderate adverse). It is considered that the effect on a number of the views tested including from the Marlow Road, (reported as minor adverse) are

understated and the photomontages provided clearly illustrate that the scale of buildings close to the boundary will dominate the views from the Marlow Road in particular.

9.30 The impact on views from the South East of the site upon residential receptors is included within the ES LVIA and assessed as major adverse in the medium term reducing to moderate adverse in the long terms when screen planting has matured, which is accepted.

9.31 In terms of cumulative effects the ES considers cumulative effects arising from the planning permissions granted at -

- Cressex Island for commercial development (former park and ride, Crest Road)
- Handy Cross Porsche centre and Bentley car dealership (former sports centre) and
- Handy Cross park and ride/leisure/hotel/foodstore/amenities building and parking

in relation to the visual impact on Westhorpe House and Westhorpe Park Homes. This predicts an adverse effect of major significance during works and major significance in years 1-5 reducing to a moderate effect in year 15.

AONB Setting

9.32 The site is within the setting of the AONB which lies to the land to the north of the site, beyond Marlow Road (A4155) and policies cited above seek the conservation and enhancement of the AONB's landscape character and visual amenity, and the avoidance of significant harm to the AONB from development within its setting.

9.33 The Wycombe District Local Plan (2019) sets out its AONB policy CP10 and DM30, seeking the conservation and enhancement of the AONB's landscape character and visual amenity, and the avoidance of significant harm to the AONB from development within its setting. The proposed development, by way of its predominantly functional form, density, scale and character, does not satisfy either of these policies.

9.34 The proposed vehicular access to the site, using the current point of access for Westhorpe House and Westhorpe Park has evolved during the planning application stage and a substantial roundabout is now proposed instead of the original signalised T-junction. The consequences of this will be, amongst other things, a significant loss of existing mature trees along the northern boundary, and the introduction of a major urbanising element in the road corridor.

9.35 It is considered that this proposed development in the immediate setting of the AONB causes significant harm to the AONB's landscape character and visual amenity. The adverse impact on the setting is as a result of the scale of the proposed buildings, covering an extensive site area resulting in an abrupt change in landscape character at the boundary of the AONB. The resulting visual intrusion affects views into and out of the AONB and would fail to conserve and enhance its

natural beauty and landscape character. The adverse impacts include interference in views out of the AONB particularly from the public viewpoints / rights of way at Bloom Hill and interference with views of the AONB from public viewpoints outside the AONB at Winter Hill. The development will also result in a loss of tranquillity through the introduction of lighting and traffic movement. The Council's landscape officer and the Chilterns Conservation Board (CCB) in their consultation response, concur with this conclusion.

9.36 The Chilterns Conservation Board (CCB) advise that the site itself is within an area identified for inclusion in the AONB as part of AONB Boundary Extension Work by Natural England. *The proposed development is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF).* As noted, this process does not confer any additional planning protection over the site or area being considered for inclusion within the AONB.

Dark skies

9.37 The approach to lighting is set out in the Design and Access Statement and it is stated that the lighting strategy aims to enhance the appearance of the building whilst recognising the area's medium to low district brightness. The entrances to the buildings will be lit from surface mounted or soffit fixings, supplemented by bollard lighting. There are also column lights on the roads. The design avoids the use of uplights to avoid extreme reflection and glare. It is stated that light spill from interior lighting will be reduced through controls. It is stated that filming at night does not take place very frequently, and, there would be no permanent flood lighting installed in the backlot areas. *When temporary lighting is required, it will be directed into the area identified as backlot. Areas outside this area would create dark buffer zones for the existing habitats.*

9.38 Operational night time lighting has been assessed as part of the ES LVIA. The LVIA Table 1.4 above also sets out night-time effects. Operational lighting would be visible at night in a number of views, the intervening vegetation would partially obscure views, but the illuminated buildings and backlot would be visible. A number of adverse effects are reported including in respect of the views from Winter Hill and Bloom Hill.

9.39 While lighting should be directional to avoid unnecessary light pollution, and can be subject to planning conditions, it is considered that the illumination associated with the development would have some impact upon the dark skies context of existing views including from Winters Hill and Bloom Hill. It is noted

that the CCB in their submission on the application raise concern that pockets of high-intensity illumination and would be visible from Winter Hill, at dusk, and during the night.

Summary

9.40 Where the existing urban area of Marlow is tightly contained by the A404, the proposed development will break away from this and extend significantly eastward into the neighbouring countryside. This intrudes upon and obscures views between the Thames Valley and Chilterns AONB and breaks the continuity of the open rural landscape between them. The proposals result in significant adverse impacts upon landscape character and significant visual effects. While the quality of the proposed architecture and hard/soft landscape is evidently high, the proposals will result in a very large, dense and imposing development in a sensitive landscape location, and will cause significant harm to the landscape character and visual amenity of the setting of the Chilterns AONB, Thames Valley and users of the public footpaths. There will also be some harm to residential receptors. Mitigation measures incorporated into the design can do very little to change this, as the function, layout and scale of the development evidently has very limited scope for flexibility. The proposed development will not be successfully integrated into the landscape. The existing openness of the site is an essential feature of the landscape, providing continuity of views and a sympathetic transition of character from the Chilterns AONB into the Thames Valley landscape, which also reinforces the essential openness of its function as Green Belt. The use of landscape mitigation by softening/screening with trees and other vegetation at the edges does not compensate for this, as it creates or reinforces enclosure that obstructs the essential visual relationship between public routes/spaces and the surrounding countryside. The creation of high quality landscape spaces and 'enhancements' to public rights of way are commendable but ultimately urbanising features that change the fundamental character of countryside amenity that is currently enjoyed by members of the public, and which remains a key objective for public recreational use in this location.

9.41 Overall, the proposed development would result in an adverse impact to landscape character, and visual harm including to the AONB setting both in terms of landscape character and visual effects. The adverse effects would be of major significance and long term. Therefore the proposals are considered to conflict with the Local Plan policies CP9, CP10, RUR4, DM30, DM32, DM35 and Delivery And Site Allocations Plan (2013) Policy DM11. Overall the harm identified would be substantial attracting negative weight, including great weight in respect of harm to the AONB setting, which will be carried forward to the planning balance.

10 Raising the Quality of Place Making and Design

Wycombe District Local Plan (August 2019):

POLICY CP9- Sense of place

POLICY RUR4- Little Marlow Lakes Country Park

POLICY DM35- Placemaking and Design Quality

- 10.1 Policy CP9 – Sense of Place, requires development to achieve a high quality of place which contributes positively to making places better for people and which takes the opportunities available for improving the character and quality of an area and the way it functions. Policy DM35 - Placemaking And Design Quality, states that all development is required to improve the character of an area and the way it functions, and to evidence a sequential approach to avoid, minimise and mitigate any harm, and to prevent significant adverse impacts on the amenities of neighbouring land and property.
- 10.2 The requirements of Policy RUR4 state that any development within the Country Park should provide for environmental improvements, including the provision of publicly accessible open space, ecological and biological enhancements, and contribute to the continued development and long term management of the Country Park. Planning permission will not be granted that has an adverse effect upon the amenities or setting the River Thames, watercourses, lakes, wet woodlands, adjoining conservation areas, or listed buildings, or which prejudices the function of the area for the purposes of a Country Park. Any development is required to provide safe, convenient and direct access to Marlow and Bourne End for pedestrians, cyclists, and disabled users. Any development close to an existing waterbody or other wetland feature should protect and enhance that feature’s ecological value, biodiversity, and its setting within the Country Park.
- 10.3 The Framework at paragraph 126 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 10.4 Paragraph 130 states that developments, among other requirements, should function well and add to the overall quality of the area, should be visually attractive as a result of good architecture, layout and landscaping, and should be sympathetic to local character and history including the landscape setting. Paragraph 133 states that Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.

Paragraph 134 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, any local design guidance and supplementary planning documents such as design guides and codes.

- 10.5 The National Design Guide has been introduced and this places great importance on context and detailing, stating, for example, that *'well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones'*.

Site context and scheme design

- 10.6 The proposed development context is described at section 2 of this report. The site is separated from Marlow to the west by the A404 and the Globe Park employment buildings. The A4155 (Marlow Road) bounds the site to the north with open fields within the Chilterns AONB beyond that. Westhorpe Farm Lane bounds the site to the east, with an athletics complex and open fields. The Grade II listed Westhorpe House and Westhorpe park homes are located to the south-east of the site. The lakes and woodland characterise the southern site context.

- 10.7 The application is supported by a Design and Access Statement (DAS) which documents the design approach taken to the development brief, the constraints and opportunities and the evolution of the design through design review and public engagement. It is noted that a three-stage design review process with Design South-East ('DSE') has been undertaken and their broadly supportive reports / letters are included with the application.

- 10.8 The Environmental Statement describes the design evolution and design development in consideration of environmental effects including to reduce the potential impacts to the long views of the site - buildings were designed to be stepped back, to include articulated roofs and the use of green buffers and green corridors.

- 10.9 An illustration from the DAS together with supporting text summarises the masterplan design approach.



The massing responds to the functional requirements of buildings and the visual impact constraints from key views. The height of the building in the edge of the scheme has been designed to be below the adjacent tree canopy.

The taller and larger buildings—the sound stages and Northern (MSCP)— 18 to 21m - are concentrated in the centre of each cluster. The peripheral buildings – 16m - step down towards the boundary and bring a smaller-scale to existing roads.

The workshops within the perimeter use pitched and saw-tooth roofs to provide movement, articulating these buildings to reduce the scale of these buildings.

Amenity Pavilions are distributed throughout the masterplan to provide a finer grain and a more human scale.

The Studio Hub presents a curved floor plan, breaking with the traditional grid that defines the master-plan.

10.10 Site Layout: The northern part of the site (Plots 1-3) broadly comprises a dense grid of buildings of various sizes. Smaller buildings are mostly set towards the northern and southern perimeters with larger/taller buildings occupying the centre. This enables a more dynamic frontage and less imposing scale to be achieved at the northern and southern edges. Relatively narrow internal streets and the use of multi-storey car parking facilitates the close spacing of buildings. Principal planting areas are located along the perimeters, mainly to provide screening, and along the central spine to provide a landscaped approach to Westhorpe House and Westhorpe Park. Bio-solar green roofs will be provided on the sound stages.

10.11 The Urban Design and Landscape officer considers that the proposed site layout makes an efficient use of the northern part of the site, and is reflective of the functional needs of the development, but this density of buildings will emphasise the imposing nature of the proposed development. It is located furthest from views from Winter Hill to the south, but lies adjacent to the Chilterns AONB, immediately north of the A4155, and adjacent to the busy A404. Some of the largest buildings present a staggered edge towards the western boundary of the A404.

10.12 Plot 4 comprises open space surrounded by woodland with a 'culture and skills' building occupying a modest area towards the north of this plot. It is a predominantly green space that will provide for public amenity. A proposed new bridge will connect Plot 4 to Plot 5 across Westhorpe watercourse, providing vehicular access to Plot 5 which serves as a backlot for outdoor filming. The bridge width is 8m and a 'culvert' structure allowing it a low profile. The bridge will not be

open to the public and Plot 5 will have a secure perimeter comprising a bund and fencing along with a dense screen of vegetation. A mixture of reinforced grass and hard surfacing will occupy the centre. The structures and equipment occupying Plot 5 will come and go, often having a part-built and temporary character. The backlot at Plot 5 will at times be intensively used and is likely to have a strong presence in elevated views from the south such as at Winter Hill, to which the backlot lies relatively close.

10.13 The proposed site layout permits the retention of most existing trees and other vegetation, which is generally located at the perimeter of the site, with the exception of the northern site boundary. The proposed development will reinforce and manage these areas. The amended access, providing a roundabout at the northern boundary, results in a significant loss of existing mature trees, a weakened landscape buffer along the northern edge and the introduction of a major urbanising element in the road corridor.

10.14 **Scale and massing:** The massing responds to the functional requirements of buildings. The taller and larger buildings—sound stages up to 22m high, and the Northern Multi-Storey Carpark (MSCP) up to 20m high — are concentrated towards the centre of each cluster (Plots 1 – 3). The peripheral buildings step down towards the boundary, with workshop /office heights of approximately 12m to 19m. The buildings for public use – Culture and Skills Academy (12m) and Community Building (5m) are single storey. The northern part of the site slopes north to south with a fall or level difference of approximately 7m. The high spot in Plot 1 is adjacent to the A4155 Marlow Road, 37.2m Above Ordinance Datum (AOD) falls to 30.6m AOD adjacent to the access into the existing Westhorpe Park. The remainder of the site is relatively flat and low lying.

10.15 **Building Design:** The proposed buildings are mainly functional in form. The sound stages adopt a very simple rectilinear form, not unlike large scale modern warehouses. The multi-storey car parks adopt a similar scale and form, though elevations have scope for more distinctive materials and detailing. Workshops/offices adopt pitched roofs and detailed front/rear facades to add variety, visual interest and a degree of activity. Building detailing and material choices serve to break up the mass of buildings as much as possible and minimise the prominence of the proposed development in the wider landscape. Otherwise the functional needs of the buildings are necessarily reflected in their scale, form and detailing.

10.16 The Landscape and Urban Design Officer comments that the proposed Hub building adopts a contrasting curved and distinctive form, with a high degree of transparency. Its location is at the 'back' of the northern site, has a somewhat imposing presence upon the adjacent public footpath and is in close proximity to Westhorpe House and Westhorpe Park. While officers have raised these design concerns it is accepted that the design of the building was addressed by the Design Review Panel, which influenced its final form: the DRP noted *"The [Hub] building now creates a secure line whilst embracing a more direct and open link with the*

studios themselves. The entrances are more appropriately handled and discreet.
The proposed culture and skills building in Plot 4 adopts a farm courtyard layout and low-rise architecture inspired by traditional barns, which will sit well within its wooded setting.

- 10.17 A 'community building' with the potential for use by the local community/residents is located in Plot 2a at the southern end of the site close to Westhorpe House. This is a simple single storey building with pitch roof form.
- 10.18 The northern studio area includes design elements to support biodiversity and visual screening, including over 40,000 square meter of bisolar green roofs (planted roof under and around PV / solar panels), located on all sound stages and both multi-storey car parks. Green walls are also proposed along the eastern boundary in particular.
- 10.19 **Landscape design:** The landscape design vision is to create a biodiverse campus integrated with its landscape setting. The more ecologically valuable southern plots (4 and 5) are maintained as predominantly open spaces with existing high-distinctiveness habitats retained. The development is surrounded by landscaped buffers which are described as multifunctional landscapes providing ecological corridors and Sustainable Urban Drainage Strategies attenuation as well as providing separation from near neighbours and screening to long views.
- 10.20 The Landscape and Urban Design officer is broadly satisfied with the quality of hard and soft landscaping but raises particular concern about the northern perimeter site access, where exiting trees will be lost and there is insufficient scope to introduce a robust landscape buffer of trees and shrubs for maximum screening. *This will leave the rear of workshops and some of the larger buildings within relatively exposed in views from the north.*
- 10.21 It is noted that planting to the eastern boundary has been amended during the planning application and officers are satisfied that within the limitations of the current site layout that the planting here, including climbing 'green walls', has been maximised, but note that this remains a narrow buffer within the site where screening continues to rely significantly on semi-ornamental conifer trees within neighbouring land. Planting within Plots 4 and 5 will reinforce and supplement native trees and shrubs to achieve a naturalistic landscape setting to the development and provide a degree of screening from the surrounding area, which is considered satisfactory.
- 10.22 A proposed water tower to act as part of a wider art strategy was initially proposed but omitted through an amendment to the application. Marlow Film Studios now proposes a smaller-scale public art strategy, with a focus on the publicly visible areas on the site with good visual links to public routes that cross the site or are close to the perimeter. It is stated that details of the strategy are capable of being captured by condition.

Conclusions

10.23 Officers recognise that the scheme has significant design merit. The design process informed by public engagement and design review, accords with policy guidance. The DAS demonstrates a rational design response to the development brief. The quality of the proposed architecture and hard/soft landscape is considered to be high. However this will be a very large, dense and imposing development in a sensitive landscape location, and will result in significant harm to the landscape character and the visual amenity of the area. Mitigation measures have been incorporated into the design but fundamentally because of its scale and extent the proposed development will not be successfully integrated into the landscape. It will provide high quality landscape spaces and 'enhancements' to public rights of way which are commendable but ultimately urbanising features that change the fundamental character of countryside amenity that is currently enjoyed by members of the public, and which remains a key objective for public recreational use in this location. It is recognised that the designer has done what can be done but the landscape and visual impacts which have been already addressed weight significantly against the proposals.

11 Arboriculture

Wycombe District Local Plan (August 2019):

POLICY DM34- Delivering Green Infrastructure and Biodiversity in Development
Canopy Cover Supplementary Planning Document (SPD) March 2020

11.1 Local planning policy DM34 requires developments to protect and enhance green infrastructure features for the lifetime of the development. It requires a future canopy cover of 25% of the site area on sites outside of town centres and 0.5ha or more. This will principally be achieved through retention and planting of trees, but where it can be demonstrated that this is impractical, the use of other green infrastructure (e.g. green roofs and walls) can be used to deliver equivalent benefit. Development is required to make provision for long term management and maintenance of green infrastructure and biodiversity assets and to protect trees to be retained through site layout and during construction. The Canopy Cover SPD provides guidance on the delivery and calculation methods for the 25% canopy cover requirement.

11.2 The Framework at paragraph 131 states that trees can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that opportunities are taken to incorporate trees in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

11.3 The application has been accompanied by an Arboricultural Survey and an Arboricultural Impact Assessment which conclude that there is a wide range of mainly broad leaved species on the site of varying ages and sizes. A total of 234

individual trees, groups of trees, woodlands and hedgerows were surveyed in or adjacent to the site. Of these, 8 were classified as category A (high quality), 73 as category B (moderate quality), 141 as category C (low quality) and 12 as category U (very low quality).

11.4 Tree Preservation Order (TPO): TPO 34/1993 is in force to the southwest of plot 5 and will not be affected by the proposed development. TPO 01 / 1983 is in force in relation to the grounds of Westhorpe House. This is outside the Red Boundary Line; however, some trees grow close to the boundary. The Root Protection Areas (RPAs) of these trees have been considered in the proposed design.

11.5 The row of poplars to the north of the site (G14) is highly visible in the surrounding landscape and marks the boundary of the Area of Outstanding Natural Beauty. Existing mature hedgerows around the northern part of the site provide a strong buffer to the perimeter and valuable linear habitat. Existing trees remain along the drive to Westhorpe House and within the self-seeded woodland between Plots 4 and 5.

11.6 Tree losses would occur in order to facilitate the development. In particular, tree losses will occur to accommodate the proposed new roundabout and part of the frontage with the Marlow Road with the removal of several trees including sycamores, a goat willow and part of a group of Lombardy poplars. This will have a significant impact on views in and out of the site.

11.7 A Tree Canopy Cover Plan has been submitted with this application and shows tree canopy cover across the masterplan and demonstrate compliance with the canopy cover requirement. The total canopy cover area for the application has been calculated as 96,078m² with a total of 27% tree canopy cover proposed to be achieved. This is comprised of 13% existing trees, 10% proposed new trees and 4% green infrastructure elements including biodiverse roofs to soundstages and some green walls. A number of components contribute to canopy cover:

- Retention of existing trees and groups
- Creation of new areas of woodland
- New tree planting within streets and buffer zones
- New green infrastructure elements including biodiverse roofs to soundstages and green walls.

11.8 New planting proposed is in the form of native trees with Hawthorn, Hornbeam, Whitebeam, Bird Cherry, and some lesser amounts with elm cultivars, beech and an oak, although the Arboricultural officer considers that there is scope for a wider selection of other native species to be used as well as non-natives that naturalise, or even some exotics which work in our landscapes. Mitigation and replacement planting (with a wider range of species) could be secured by condition.

11.9 Overall, whilst the loss of some trees to facilitate the development results in detriment to the landscape character of the area, taking into consideration mitigation that can be achieved and compliance with the 25% canopy cover requirement, the development is considered to accord with policy DM34 and the Canopy Cover SPD.

12 Residential Amenity

Wycombe District Local Plan (August 2019):

POLICY CP7 – Delivering the Infrastructure to Support Growth

POLICY CP9 – Sense Of Place

POLICY DM35 – Placemaking And Design Quality

Wycombe District Adopted Delivery And Site Allocations Plan (2013)

POLICY DM19 - Infrastructure And Delivery

12.1 Policy CP7 states that, where justified, development will be required to provide or contribute towards delivering the key infrastructure requirements for the District including facilities that promote healthy living including for sports, open space and recreation.

12.2 Policy CP9 – Sense of Place, requires development to achieve a high quality of place which contributes positively to making places better for people and which takes the opportunities available for improving the character and quality of an area and the way it functions.

12.3 Policy DM35 - Placemaking And Design Quality, states that all development is required to improve the character of an area and the way it functions, and to evidence a sequential approach to avoid, minimise and mitigate any harm, and to prevent significant adverse impacts on the amenities of neighbouring land and property.

12.4 Wycombe District Adopted Delivery And Site Allocations Plan (2013) Policy DM19 - Infrastructure And Delivery, states that where development will create a need to provide additional or improved infrastructure, amenities or facilities, developers will be expected to make such provision directly, including through planning obligations and / or through Wycombe Community Infrastructure Levy.

12.5 The NPPF seeks to achieve healthy, inclusive and safe places, promoting social interaction, safe and accessible development and support healthy life-styles. This should include the provision of amongst other things of, access to high quality open spaces and opportunities for sport and recreation and the protection and enhancement of public rights of way, and designation of local spaces. Paragraph 92 (b) of the NPPF advises that developments should be safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

- 12.6 The NPPF at Paragraph 130 states that planning decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 12.7 The NPPF Paragraph 174 states that decisions should contribute to and enhance the natural and local environment by amongst other things, preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution.
- 12.8 Paragraph 185 states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should identify and protect tranquil areas which have remained relatively undisturbed by noise.
- 12.9 There are a number of homes to the south-east of the site. This includes 31 apartments within Westhorpe House and 55 dwellings at Westhorpe Park Homes; there are also residential properties within close proximity accessed from Westhorpe Farm Lane including the dwelling Stallworthy located between Plots 4 & 5. It is noted that the proposed watercourse crossing connecting these plots will require the existing Stallworthy private driveway (running parallel to the Plot 5 access track and the watercourse) to be raised approximately 1m to tie into with the vertical alignment of the crossing structure. Due to the proximity of the proposed development to many of the properties, including the workshops and offices in Plot 2a, the Skills and Culture academy in Plot 4, and Backlot in Plot 5, the development could impact on residential amenities including through harm by reason of noise (during the daytime and night time on the backlot or when events are held), and disturbance through traffic noise and increased traffic on access roads.
- 12.10 The Design and Access Statement (DAS) demonstrates how the design responds to proximity to Westhorpe House, Westhorpe Park and Westhorpe Farm Cottages and existing residential buildings adjacent to or near the site, to minimise potential visual, light and noise impact. The closest residents located within the Westhorpe Park Homes will be c.27 metres from the nearest building and those buildings in closest proximity are some of the smaller scale buildings within the development (c12 – 15m high). For most residential properties, the whole development will fall under a 25-degree angle that subtends from the horizontal as measured from the lowest habitable neighbouring windows, therefore there will not be any additional material overshadowing. Given the distance of the Park Homes from the nearest building and the presence of an existing high level intervening wall, there is not considered to be any significant impact on amenity in terms of outlook, overshadowing or loss of light.

12.11 A Daylight and Sunlight Report (Document 22) analysis has been carried out in accordance with the methodology contained in the Building Research Establishment's Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2011). The analysis shows that all surrounding residential properties will meet the target values set out within the BRE guidelines when considering daylight and sunlight.

12.12 The lights spill assessment results show that the development will have a limited impact but includes a small increase in light spill in respect of 'Stallworthy' within the 1-2 lux range, which is identified as being acceptable in a E2 Rural to E3 Suburban Zone. There would be an impact on the Crown Plaza hotel which would exceed the normal rural/suburban range, but this must be seen in the context of the existing light levels at Crown Plaza and the transient nature of the occupants, which renders it lower sensitivity. The lighting impact is proposed to be mitigated through the retention and enhancement of existing vegetation on the site and the preparation of a backlot management plan, which could include lighting mitigation, such as screening as part of set designs. Therefore, it can be concluded that the impact of lighting has been taken into account, the harms arising to sensitive receptors are limited and capable, to a large extent, of being mitigated.

12.13 There will be impacts during the construction phase, but these impacts will be capable of being managed, and will be time limited. An Outline Construction Logistics Plan (CLP) and Construction Environmental Management Plan (CEMP) has been prepared which sets out outline measures to control construction related noise and vibration including control of construction periods, plant to be used and adoption of low noise and vibration techniques. The potential effects of the development have been assessed both with and without noise and vibration control measures in place. The assessment results are presented in the ES Table 11.11 and Table 11.20, below. A Construction and Environmental Management Plan (CEMP), which could be secured by condition, would be able to mitigate the most significant adverse impacts at the construction stage.

Table 11.11: Demolition & construction noise assessment

SR ID	SR	Construction Threshold Level dB L _{Aeq,T}	Earthworks (dB / Effect)	CFA Piling (dB / Effect)	Concreting (dB / Effect)	Pavement (dB / Effect)
A	Properties on Winchbottom Lane	70	54 Negligible	54 Negligible	52 Negligible	51 Negligible
B	Properties on The Chase	75	70 Negligible	71 Negligible	69 Negligible	67 Negligible
C	Crowne Plaza - Marlow	65	84 Major	76 Major	74 Major	81 Major
D	Westhorpe House and Westhorpe Park	65	84 Major	76 Major	74 Major	81 Major
E	Westhorpe Farm	65	61 Negligible	62 Negligible	61 Negligible	59 Negligible
F	Moat House	65	64 Minor	65 Minor	63 Minor	61 Minor

Table 11.20: Demolition & Construction Noise Assessment - Mitigated

SR ID	SR	Construction Threshold Level dB L _{Aeq,T}	Earthworks (dB / Effect)	CFA Piling (dB / Effect)	Concreting (dB / Effect)	Pavement (dB / Effect)
A	Properties on Winchbottom Lane	70	44 Negligible	44 Negligible	42 Negligible	41 Negligible
B	Properties on The Chase	75	60 Negligible	61 Negligible	59 Negligible	57 Negligible
C	Crowne Plaza - Marlow	65	74 Moderate	66 Moderate	64 Minor	71 Major
D	Westhorpe House and Westhorpe Park	65	74 Moderate	66 Moderate	64 Minor	71 Major
E	Westhorpe Farm	65	51 Negligible	52 Negligible	51 Negligible	49 Negligible
F	Moat House	65	54 Negligible	55 Negligible	53 Negligible	51 Negligible

12.14 Noise from the (operational) development, particularly noise associated with filming, set construction and plant, has the greatest potential impact on neighbouring properties. A lot of these noise sources are unknown or variable in nature. The ES states that fixed mechanical plant will be selected to be inherently quiet and where suitably quiet plant cannot be procured noise control measures in the form of acoustic screens and attenuators would be incorporated. It is noted that the sound stages have been located towards the centre of the site and screened by uses which generate lower levels of noise. The soundstage buildings themselves have been designed to be acoustically robust to prevent both noise ingress into the building and noise egress to both nearby sensitive receptors and other noise sensitive uses, such as soundstages and offices. It is noted that the backlot area is located in the centre of plot 5 some distance from sensitive receptors and incorporates earth bunds to provide screening from noise generating activities. To protect the amenity of residents in the vicinity, the Environmental Health Officer requires a noise management plan prior to the occupation of the site, including details of being submitted for planning approval prior to installation.

12.15 Construction traffic would result in a change in noise levels but is considered to be negligible and insignificant. The predicted change in road traffic noise as a result of the complete and operational development is less than 1 dB and therefore considered negligible, and the effect is therefore insignificant.

12.16 There would remain some residual impacts on the amenity of neighbouring residents and the approach to many of these homes will change from being down a rural access road, to a route through a commercial business area, with buildings up to 21m high now lining the access road.

12.17 It is however noted that some benefits for nearby residents would result from the scheme, some of which have resulted from consultation with the community. These benefits include improvements to walking and cycling routes and bus services, and provision of the Skills & Cultural Academy, associated

Recreational Land and Community Hall to be available for education, community use, private hire, and cultural events.

12.18 In terms of cumulative effects, the ES considers cumulative effects arising from the planning permissions granted at -

- Cressex Island for commercial development (former park and ride, Crest Road)
- Handy Cross Porsche centre and Bentley car dealership (former sports centre) and
- Handy Cross park and ride/leisure/hotel/foodstore/amenities building and parking

in relation to the impact of noise and vibration on Westhorpe House and Westhorpe Park Homes.

12.19 This ES cumulative assessment predicted *“Adverse effects up to Moderate Significance, however despite noise levels of moderate adverse significance being predicted as noise levels fall below the 75dB LAeq,T limit they are considered insignificant.”* in relation to noise and *“Adverse Effect of Minor Significance (Local, temporary, short-term, direct)”* in relation to vibration. This would be in operations. In terms of operational noise this is predicted as minor significance.

12.20 It is concluded that the scale of development is not wholly compatible with the character and amenities of the adjoining developments and there is some conflict with policy. The development would have an impact on the amenities of several residential dwellings – Westhorpe House, Westhorpe Park, Westhorpe Cottage, Westhorpe Farms and Stallworthy - and include harm by reason of noise and disturbance through traffic noise and increased traffic on access roads. Whilst some impacts can be mitigated through design and conditions, there would remain some residual amenity effects on neighbouring residents contrary to Local Plan Policies CP9 and DM35. This harm is carried forward to the planning balance.

Healthy & Safe Communities

12.21 The supporting Design and Access Statement (DAS) summarises the safety and security proposal for Marlow Film Studios. Document 20: Security Needs Assessment provides further information on the threats and mitigation strategies. It is stated that the design will provide a safe environment for the workforce, visitors and staff. The design solutions adopted in Marlow Film Studios include:

- Landscaping which includes sensitive and carefully designed perimeter fencing.
- The masterplan is optimised for clear site views and openness to avoid an overbearing security environment.
- There will be a 24/7 security presence. On-site control centre for security alarm and CCTV systems connected to all buildings.
- Controlling and monitoring entrance and exit options.
- Vehicle control.
- Developed security will guarantee the privacy and security to Westhorpe Park Homes.

- 12.22 The DAS states that the public realm areas within Marlow Film Studios will promote a safe and secure environment by considering the principles of Crime Prevention through Environmental Design (CPTED). These principles are:
- The design of outdoor spaces to maximise the visibility of space and a lighting scheme to be well-designed.
 - Provide Natural Access Control by marking the entrances and existence of spaces with low-level natural features and lighting.
 - Offer Territorial demarcation by defining spaces through landscaping techniques or other features.
- 12.23 Overall, it is considered that crime and safety concerns can be mitigated through a security Framework, reducing the risk of crime to a less likely occurrence, which would be policy compliant.

13 Heritage

Wycombe District Local Plan (August 2019):

CP11: Historic Environment

DM31: Development Affecting the Historic Environment

RUR4: Little Marlow Lakes Country Park

- 13.1 Legislative considerations are as follows:
- The Planning (Listed Building and Conservation Areas) Act 1990
 - Section 66 of the Planning (Listed Buildings Conservation Areas) Act 1990 places a duty on the LPA to have special regard to the desirability of preserving listed building or their settings or any features of special architectural or historic interest which it possesses.
 - Section 72 requires that special attention is given to the desirability of preserving the character and appearance of Conservation Areas.
- 13.2 Policy CP11 states that the Council will promote the conservation and enhancement of the Historic Environment including heritage assets, historic landscapes and conservation areas. Policy DM31 states that all development is required to conserve and where possible enhance the historic environment. Bullet 5 requires that where development would lead to less than substantial harm to the significance of a designated heritage asset, consent will be refused unless this harm is outweighed by the public benefits of the proposal, including securing its optimum viable use.
- 13.3 Policy RUR4 (Little Marlow Lakes Country Park) confirms that *'Planning permission will not be granted for development within the Country Park that that*

has an adverse effect upon the amenities or setting {of}adjoining conservation areas, or listed buildings’.

13.4 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.

13.5 Para 199 of the NPPF requires that great weight should be given to the conservation of designated heritage assets. Para 200 confirms that harm to the significance of a designated heritage asset can arise from its alteration or destruction, or from development within its setting. Any harm should require clear and convincing justification. Para 202 requires that this harm should be outweighed by public benefits, including where appropriate securing its optimum viable use. Para 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. *In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

13.6 Paragraph 205 states that Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.

Archaeology

13.7 The Buckinghamshire Historic Environment Record (HER) office and Archaeology Officer were consulted on the application. They note the following Records of potential archaeological interest:

0614600000	West of Little Marlow: Bronze Age burnt mounds, ditch and post-holes found in excavation in Little Marlow
1516100000	North of Wilton Farm: Possible ring ditch visible on aerial photograph
0188800000	Losemere Manor: Historical records of medieval to post-medieval manor of Losemere
0188801101	Grounds of Westhorpe House: Site of possible Second World War prisoner-of-war camp in the grounds of Westhorpe House.

13.8 Chapter 15 of the Environmental Statement refers to Historic Environment, including archaeological investigation. It is recognised that there is a potential for currently unknown heritage assets to be located within the site, which could be of

a value ranging from negligible to high. Where present, there is a potential for them to be adversely impacted through ground disturbance. The magnitude of effects would be dependent on the value of the heritage asset impacted and could range from minor to major.

13.9 On this basis, the ES recommends that a programme of archaeological evaluation is completed to confirm the presence and condition of any surviving archaeological remains within identified areas of remaining archaeological potential within the site. This will then inform any mitigation works that may be required. The Archaeology Officer agrees with this course of action, which would also be NPPF compliant (para 205). The requirement for these works could be secured by condition.

13.10 It is considered that the impact on archaeology would have neutral weight in the planning balance.

Heritage assets

13.11 The 36-hectare site is situated on the former parkland historically associated with, and in the setting of, Westhorpe House; a prestigious listed building (Grade II) immediately outside the site boundaries but effectively surrounded by it on 3 sides. Corner Cottage, a Grade II listed building which dates from the 17th century lies just over 100m to the south, and approximately 500m to the east is Little Marlow Conservation Area.

13.12 Section 5, Fig 5.29 in the Design and Access Statement (DAS) indicates that the Zone of Theoretical Visibility extends as far as central/eastern Marlow to the west, Bourne End and Well End to the east, and Cookham Dean/Winter Hill, in the adjacent District to the south, covering multiple heritage assets including listed buildings, conservation areas and non-designated heritage assets. The effect on the settings of many of these heritage assets will be neutral/negligible.

13.13 The proposals do not physically impact the built fabric of any listed buildings nor are they within the designated conservation area. The consideration of heritage therefore relates to whether the application affects the significance of the designated heritage assets through development in their settings.

Westhorpe House

13.14 Westhorpe House and the attached service wing were built in the early 1700s with C19 and C20 alterations and extensions. The house is a very early example of the Palladian classical style in Buckinghamshire (and England). During the 20th century the estate fragmented with some deterioration of the historic environment. The house fell into a semi-derelict condition during the 1950s and a large, modern extension was permitted in the 1980s, in part to make it viable for use as an office headquarters. More recently, the house has been subdivided into self-contained apartments.

- 13.15 The site surrounding Westhorpe House has long been associated with the property since its construction in the early C18th. Although the ownership of the park is now divorced from the house and the parkland character diminished, the site makes an important contribution to the significance of the building. It forms a spacious, open setting which allows the building to be appreciated as an important asset at the centre of a historic estate and the long driveway approach heightens the experience.
- 13.16 The Heritage Statement suggests that the building now falls short of its listed status and that for the purposes of the application it should be downgraded from national (high) importance to medium. There would not appear to have been an application to de-list the building and in the Heritage Officer's opinion, such an application would not be successful in view of the building's surviving historical and architectural interest. Its significance is enhanced by the contribution of the surrounding estate to its setting comprising open land, fields and water courses.
- 13.17 The proposed development would encircle Westhorpe House on three sides and would cover almost the entirety of its former parkland. This would permanently and irrevocably change the character of the open landscape of the wider setting of the listed building. The legibility and structure of the historic environment would be eradicated. It is considered that the existing landscape is potentially capable of restoration to a more pastoral appearance, and indeed, is likely to be enhanced if the site were developed in accordance with Policy RUR4. Consequently, the development of this amount, scale and density of built form would adversely affect the significance of Westhorpe House.
- 13.18 It is acknowledged that the 'smallest' buildings are placed at the edges to mitigate impact, nonetheless the scale of the individual buildings is substantial. The 4 workshop/offices adjacent to the southern boundary of plot 3 range from 55m to 61m in length and are 15m in height. Soundstages are of an even more considerable scale (the sound stage on plot 2a is 73m x 50m and 21m in height). The scale of even the small buildings dwarfs the scale of Westhorpe House which would be overwhelmed by the sheer size, number and dispersal of the proposed buildings on site. As such, the legibility of the building being the centrepiece of the estate surrounded by open land would be lost.
- 13.19 Two substantial, landmark buildings are located within close proximity to Westhorpe House. The Studio Hub, described as 'the heart of the scheme', is located immediately beyond the listed building's garden curtilage and is designed as the focal point of the development with a deliberately eye-catching scale and design. The Culture and Skills Academy, aligned with the house's garden front also utilises an arresting design. Rather than 'highlighting the asset's significance within the landscape', they will distract attention away from Westhorpe House. The location, scale and design of these buildings challenge the prominence and primacy of the listed building as the principal building within its the landscape, eroding its significance. The Plot 5 backlot accommodating temporary sets are

potentially of such a scale they will further detract from the setting of the listed building.

- 13.20 The northern boundary and access into the site is dominated by roundabout which, together with the loss of the existing boundary tree belt, the lack of space for any meaningful replacement landscape, the proposed 3m high northern boundary security fence and the almost continuous frontage of 15m high office/workshops, further exacerbates the visual impact of the built form. The scale, density and form of such development is incongruous as the approach to a sizable country house.
- 13.21 The Heritage Statement emphasises the screening effect of the landscape buffer around the pleasure garden which defines Westhorpe House's immediate setting. This situation largely arises through lack of management of the trees and woodland: historic maps show that the planting was historically more open, allowing views across the parkland from the house and gardens.
- 13.22 The lack of inter-visibility between the listed building and the surrounding development by virtue of the screening this vegetation provides is stressed despite case law confirming the importance attached to setting of a building is not solely contingent on its visibility from public vantage points. It should also be borne in mind that the existing landscaping around the house includes mature trees, which have a finite impact. Therefore landscaping is not necessarily permanent and there will be inevitable changes to the density of the planting over time, as trees mature and die back. This screening is also dependant on landscaping that is not within the site boundaries and therefore beyond the applicant's control.
- 13.23 The experience of approaching the house along the line of its historic driveway will also be radically changed. Whereas the existing long driveway through open land increases the anticipation of arriving at an important country house, the approach experience is along the main road through the studio complex with substantial buildings lining both sides of the route. It is acknowledged that the alignment of the historic drive will remain and that a landscape buffer is proposed on either side of the road but the scale of the buildings and extent along the driveway, with 2.4m-3m security fencing in gaps between buildings, are uncharacteristic of the established context; it is noted that 1.2m high estate railing will be immediately either side of this driveway .
- 13.24 The increased on-site activity and the noise, lighting and movement generated, will also detrimentally impact the building's setting. The number of vehicle movements will increase dramatically. The road linking plots 4 and 5 is designed to be wide enough for two 16.5m articulated lorries to pass in an area where there is currently no vehicular access. The noise and movement is likely to affect the amenity of the pleasure gardens.
- 13.25 The cumulative effect of the development therefore harms the significance of Westhorpe House from its position as the centrepiece of its estate by the

construction of landmark buildings and substantial blocks of development on its former parkland, overwhelming the listed building's wider setting and erasing the legibility of the historic environment. It is accepted that there has been some mitigation to reduce the impact and that the existing character of the landscape has been degraded to a degree. Consequently, the harm would be less than substantial. This is the same conclusion as reached in the Heritage Statement, although the magnitude of harm is concluded in that Statement to be lower.

- 13.26 Using the same methodology for the magnitude of the impact as set out in the ES at Chapter 15, the effect of the development would be Moderate/Large in significance. This arises as the sensitivity of the Grade II listed building is of High importance. The ES also confirms the effects would be significant. For the purposes of para 202 of the NPPF, the impact of the proposals on the significance of the setting of Westhorpe House would be Less than Substantial at the high end of the spectrum.

Corners Cottage

- 13.27 This cottage is timber framed with whitewashed render infill panels and an old tile roof which dates from the C17 with C20 extension. Its significance relates to its vernacular construction, use of traditional local materials and to the quality of its incidental aesthetic appearance. While the development is not on land historically associated with the building, the building derives some significance from the rural ambiance and countryside which defines its wider setting. The Heritage Statement suggests that the building is not particularly remarkable, however, the building was listed in 1987 at Grade II which identifies it of (high) national significance.

- 13.28 Plot 2a is the closest part of the development to Corners Cottage and comprises the development of a community building, further workshops/offices, a multi-storey carpark and café. The effect of the development will transform its wider context and urbanise its surroundings, harming the significance of its setting. The Heritage Officer agrees with the conclusions of the Heritage Statement that the harm would be less than substantial and of a lower magnitude than Westhorpe House. In terms of magnitude, the level of less than substantial harm is considered to be Medium/Moderate.

Little Marlow Conservation Area (LMCA)

- 13.29 Little Marlow Conservation Area benefits from the fields and countryside that extend from the application's western boundary, reinforcing the village character and rural context. Little Marlow is an attractive, compact village that extends south from the Marlow to Bourne End road to the stream running parallel to the River Thames. The parish church and Manor House form the focus of the village and there are 20 listed buildings within the settlement. Fields and arable land surround the village and it remains remarkably coherent with little modern development within or around it. The village is regarded as one of the most

attractive in the area and it became one of the first Conservation Areas to be designated by the council in 1970.

13.30 The eastern boundary landscape buffer within the development is only 12m wide including the existing hedgerow, while the existing trees are outside the development boundary and are not within the control of the applicant. This is not particularly generous for the species of very large trees that would be required to provide meaningful screening to the 16m high buildings proposed adjacent to this boundary. Anticipated tree growth of 10m in 15 years means any tree planting would take a significant time before adequate screening would be reached. The blocks of development would be evident above the tree line and visible from public viewpoints in proximity of the conservation area, adversely affecting the character of its setting. The Heritage Officer overall agrees with the conclusions in the Heritage Statement that the development would cause less than substantial harm to Little Marlow Conservation Area. In terms of magnitude, the level of less than substantial harm is considered to be towards the lower end of the scale / minor.

The Benefits of New Film Studios on Local Heritage and Landscape

13.31 An Addendum Planning Statement Appendix entitled 'The Benefits of New Film Studios on Local Heritage and Landscape' has been submitted in support of the proposals. This highlights the economic benefit of the film industry on heritage assets in general. Whilst this is of public benefit, no income is secured by the development and the film studios would contribute nothing directly to the identified heritage assets. Indeed, far from enhancing their presentation, their settings would be permanently and profoundly altered by the amount, scale and appearance of the development. The benefit is considered to be very limited to which great weight is given.

Cumulative effects

13.32 In terms of cumulative effects the ES considers cumulative effects arising from the planning permissions granted at -

- Cressex Island for commercial development (former park and ride, Crest Road)
- Handy Cross Porsche centre and Bentley car dealership (former sports centre) and
- Handy Cross park and ride/leisure/hotel/foodstore/amenities building and parking

in relation to the impact on Westhorpe House. This predicts an adverse effect of moderate significance during works and moderate effect during operation.

Summary

13.33 The scale, height amount and dispersion of the development would not preserve the settings of the listed buildings. The proposed development harms the significance of the settings of the designated heritage assets, contrary to Policies CP11, DM31 and RUR4 of the WLP 2019 and the requirements of the

NPPF. The impact of the proposals on the significance of the setting of Westhorpe House would be Less than Substantial: High; for Corners Cottage and Little Marlow Conservation Area, this would be less than substantial but of a lower magnitude than Westhorpe House. As the harm amounts to less than substantial harm, in accordance with Policy DM31, the application should be refused unless this harm is outweighed by public benefits including, where appropriate, securing its optimum viable use. Similarly, the application is also contrary to RUR4. The identified harm is therefore balanced against the public and planning benefits of the scheme, this is undertaken later in the report.

14 Highway Safety, Transport and Access

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the Infrastructure to Support Growth

Policy CP13 – Climate Change

DM33 - Managing Carbon Emissions: Transport and Energy Generation

Wycombe District Delivery and Site Allocations Plan (2013):

DM2 - Transport Requirements of Development Sites

Parking Standards and Guidance (Oct 2015)

- 14.1 Policy CP7 sets out the Council's strategic aims in respect of transport. Its aims include improvements to the A4 corridor South of High Wycombe, including at Marlow i.e. A404/A4155 Junction.
- 14.2 Policy CP13 states that the Council promotes mitigation and adaption to climate change through a strategy that minimises the need to travel by directing development to locations with better services and facilities, or where they are capable of being improved.
- 14.3 Policy DM33 sets out the sustainable transport requirements of new development to manage carbon emissions. These requirements include: the sustainable location of development; multi modal access to the Site; provision of Electric Vehicle charging points; sufficient parking and mitigating as necessary the impact on network capacity.
- 14.4 Policy DM2 *Delivery and Site Allocations Plan* sets out a requirement for major development to provide a Transport Assessment setting out how proposals will minimise their impact on the existing highway network, surrounding areas and the environment. The Transport Assessment should set out how major development will contribute to public transport, walking/cycling, and a strategy for encouraging modal shift. It also needs to provide a mechanism for monitoring and managing the modal shift through the use of travel plans and other measures.
- 14.5 The National Planning Policy Framework (NPPF) Paragraph 110 advises the following: *"In assessing specific applications for development, it should be ensured that:*

a) appropriate opportunities to promote sustainable transport can be, or have been taken up, given the type of development and its location;
b) safe and suitable access to the site can be achieved for all users; and
c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”.

14.6 Paragraph 111 of the Framework states that: “Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

14.7 Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”

14.8 Paragraph 130 states that planning policies and decisions should ensure that developments, amongst other requirements, will function well and add to the overall quality of the area, and create places that are safe, inclusive and accessible.

Site location and Local Highway Network

14.9 The site is located south of the A4155 Marlow Road and east of the A404. It is currently accessed via a private drive to Westhorpe House which forms a staggered priority crossroads junction with the A4155 Marlow Road (major arms at the junction) and Pump Lane South to the north. To the west of the site access junction, the A4155 Marlow Road forms a grade-separated junction with the A404 (the ‘Westhorpe Interchange’). To the west of the Westhorpe Interchange the A4155 Little Marlow Road forms a compact at-grade roundabout junction with Parkway.

14.10 The A404 falls within the Strategic Road Network (SRN) managed by National Highways (NH). The Westhorpe Interchange is a grade-separated roundabout which provides the interchange between the A4155 and the A404 and is part of the SRN managed by National Highways. The A404 and slip roads at the junction are the responsibility of National Highways, however the roundabout itself falls within the jurisdiction of Buckinghamshire Council (BC).

Existing Pedestrian and cycle links

14.11 The main pedestrian link connecting the site with Marlow town centre is the pedestrian footbridge (Volvo Bridge) across the A404 Marlow Bypass. This stepped footbridge is located to the southwest of the site, approximately 700m to the west

of the site boundary. The Public Right of Way links the Volvo to Little Marlow and beyond. These include a southwest/ northeast pedestrian route from the A404 footbridge to Little Marlow village, via Pound Lane. The existing Westhorpe Farm and Westhorpe House access also give pedestrian access to/from the A4155 Marlow Road. Pedestrian facilities along the A4155 Marlow Road are currently limited, especially across the A404/A4155 Roundabout to the west.

Existing Public Transport

- 14.12 The TA explains that the nearest existing bus stops are located around 430 metres east of the site access on the A4155 Marlow Road at Winchbottom Lane. However, it is understood that these stops are served by infrequent bus services only. The nearest stops with regular services are located 700m from the site at Wiltshire Road. These stops are served by the Arriva Buses 800/850 route between High Wycombe, Marlow, Henley, and Reading which operates on a weekday 20-minute frequency, Saturdays at a 30-minute frequency, and Sundays at an hourly frequency.
- 14.13 Marlow railway Station is located 1.8km from the site. Bourne End Station is approximately 3.8km from the site access.

Proposed site access

- 14.14 The access to the proposed studios is from the A4155 Marlow Road, marking the northern boundary of the site, and is by way of a new roundabout junction located directly to the east of the A404 Westhorpe roundabout junction. The originally submitted application included a proposal to upgrade the existing junction to Westhorpe House to a signal-controlled layout. This has been amended to the proposed roundabout. This provides the main vehicular access into the site and its security control point as well as access to the southern areas of the site and Westhorpe House. The proposed roundabout layout has a single lane entrance and two lanes exiting.
- 14.15 The A4155 Marlow Road feeds into the Westhorpe Interchange, a junction to the north-west corner of the site and providing the main highway route into/out of Marlow from the A404. The A404 links up the M40 to the north at High Wycombe, with the M4 to the south, by Maidenhead.

Sustainable Transport Strategy

- 14.16 It is stated within the supporting Transport Assessment (TA) that the proposals seek to deliver a sustainable Film Studios development which will 'Monitor and Manage' its impact upon the surrounding highway network, minimise travel by private motor vehicle and actively promote and encourage access by sustainable (public transport) and active (walking, cycling) travel modes.
- 14.17 Key elements of the Sustainable Travel Strategy (STS) include implementation of a Travel Plan with targets to deliver maximum 60% car driver mode share

through a circa 24% mode shift to Public Transport (bus and rail) and Active Travel (walking & cycling). Provision is made for a 'Mode Share Incentive Scheme' (MSIS) to incentivise delivery of target mode share and would be secured through a Section 106 Agreement.

14.18 A Public Transport strategy is proposed to include a new public bus service between High Wycombe and Maidenhead (Elizabeth Line); a second new public 'hopper' bus service on A4155 Corridor between Marlow and Bourne End; and a new bus stop within the site to accommodate new bus connections. The bus proposals comprise:

- New public bus service between High Wycombe and Maidenhead.
 - Connecting Marlow Film Studios with High Wycombe Rail Station and Maidenhead Rail Station (including the Elizabeth Line (Crossrail)), addressing identified gaps in existing north- south bus service provision.
 - Onward connections for rail and bus services for West/Central London and Heathrow Airport.
 - Minimum half-hourly frequency between 06:00 and 19:00 Monday to Friday, frequencies and operating hours scalable according to demand.
 - Variable routing between Marlow Film Studios and Maidenhead to optimise journey reliability.
 - Bespoke, smaller and high-quality energy efficient / sustainable buses with facilities including on-board WiFi.
- New East-West 'Hopper' bus service on A4155 Corridor between Marlow and Bourne End.
 - Connecting Marlow Film Studios with Marlow town centre, Marlow Rail Station, Globe Business Park and Bourne End Rail Station from 06:00-19:00.
 - Providing a public service which also serves employee requirements within the immediate vicinity of the Site.
- A new bus stop at the Entrance Square within the Site will accommodate the new bus connections and facilitate interchange between the Site, public transport routes and active travel modes.

14.19 The applicant advises that the bus services will be introduced on a phased basis to meet demand in line with the objectives of the MSIS as the Film Studios are developed.

14.20 Provision for pedestrians and cyclists includes provision of a permissive footpath and cycleway link within the site, improved pedestrian and cycle permeability on-site and connections with surrounding networks, including upgrading the current Public Right of Way (Footpath 20) crossing the Site. A financial contribution is proposed towards the implementation other improvements for pedestrians and cyclists in the wider area.

14.21 The applicant has prepared a summary of the walking and cycling improvements summarised as follows:

Onsite	The retention and enhancement of the existing PROWs that cross the site through improved surfacing and lighting. The provision of new routes to allow pedestrians and cyclists to move around the site.
Site Access	The provision of a roundabout on Marlow Road (A4155) retaining access for residents of Westhorpe House, Westhorpe Park Homes, and provide access to Pump Lane South including the provision of a signal-controlled crossing on the eastern arm of the new roundabout (A4155 Marlow Road) and uncontrolled pedestrian and cycle crossings on the remaining arms (Pump Lane South and the site access).
Connections to the East	The provision of a new connection to Bourne End, through the provision of a segregated footpath/cycleway through land in control of the applicant which would be separated from the Marlow Road (A4155) from School Lane, Little Marlow to the Marlow Road (A4155) / Sheepridge Lane roundabout.
Connections to the West	Partial Signal Control at Westhorpe Interchange (A404 Northbound On and Southbound Off Slip and the A4155 westbound approach) <ul style="list-style-type: none"> • Signal controlled crossing of the A404 northbound onslip; • Signal controlled crossing of the A404 southbound offslip; • Widening of the pedestrian/cycle route across the junction to 3m with a 300m buffer strip; • Increasing the height of the bridge parapet to 1.5m; • Provision of improvements to the existing pedestrian and cycle route between the site and Westhorpe Interchange.

Traffic generation and proposed mitigation

14.22 Strategic Traffic modelling has been undertaken to assess the impact of the proposals on the highway network. Through ongoing dialogue with the Council as Highway Authority and National Highways, the modelling and assessment has been developed and additional information submitted to supplement the Transport Assessment.

- March 2023 - Transport Assessment Addendum (TAA)
- June 2023 – Transport Assessment Addendum (TAA2)
- September 2023 - Supplementary Transport Assessment (STA)

14.23 The March 2023 TAA updates and provides additional information specifically considering the design evolution of the proposed site access junction with the A4155 Marlow Road, moving from a signal-controlled crossroad junction solution to a four-arm roundabout layout. It is stated that the scale of development and associated trip generation remains unchanged from that reported in the original Transport Assessment.

14.24 The June 2023 TAA2 presents the outputs of additional traffic modelling (VISSIM) which indicates impacts: in the AM Peak, the main impact is an increase in queueing on the A404 southbound off-slip, which gradually reaches back to the mainline carriageway; in the PM Peak, the westbound approach to the Westhorpe

Interchange (A4155 Marlow Road) sees an increase in delay which reaches back to and beyond the proposed Site Access roundabout, impeding vehicles leaving the development. Mitigation is proposed involving part-signalisation of the junction. It is concluded that this significantly reduces delay and queuing on the A404 off-slips in the AM Peak and also significantly reduces delay and queuing on the A4155 Marlow Road in the PM Peak, and preventing queuing from impeding egress from the site access.

- 14.25 The September 2023 STA provides details on: additional traffic surveys; the updated modelling of the site access and proposed improvements to the Westhorpe Interchange using the approved VISSIM model; the modelling of the identified junctions on the wider highway network in Marlow and Bourne End and on the A404 (M40 Junction 4 Handy Cross, Bisham Roundabout); and the assessment of identified areas on the wider highway network.
- 14.26 The applicant's case is that the STA demonstrates that with the proposed mitigation package being implemented that there would be no severe residual cumulative transport impacts arising from the proposed development, and in reference to Paragraph 111 of the National Planning Policy Framework, that there are no material transport or highway reasons why the Local Planning Authority should withhold or refuse planning permission.
- 14.27 A statement of conformity with the Environmental Assessment has been submitted with the STA noting that the conclusion remains that there would be no severe residual cumulative transport impact arising from the proposed development.
- 14.28 Transport is addressed at Chapter 8 of the Environmental Statement (ES). The likely significant effects arising from the development during demolition and construction are expected to be temporary, localised and short term. The increase in traffic and HGVs generated during this phase is relatively small when compared to local traffic flows and, hence, the anticipated adverse effects are of minor or negligible significance. A Construction Logistics Plan and Construction Environmental Management Plan (CLP and CEMP), will be secured to control and manage the impact of construction traffic.
- 14.29 The ES concludes that during the operational phase, the majority of roads in the local and wider area are expected to experience a very small increase in traffic movements compared to background traffic flows and the significance of effects are expected to be negligible to minor adverse and are considered not significant. The effect of the development upon pedestrians in terms of severance is considered long term major adverse, however it is considered not significant as there will be no material impact upon the levels of pedestrian severance already experienced in the future baseline (2027) without the development in place. Overall levels of driver delay are considered to be unchanged from the future baseline (2027) scenario at the site access, which are minor adverse. The effect of

the development on pedestrian and cycle delay and pedestrian amenity during operation is considered to be minor adverse.

14.30 The ES considers the new bus services and interchange facilities, on-site public realm and permeable network which will enable public transport users, pedestrians and cyclists to move within and across the site safely, facilitating onward connections with Marlow and the surrounding area. This is expected to benefit the users of the site and locals permanently.

Assessment

14.31 Highways officers advise that there are outstanding issues related to traffic impact, car parking, layout, sustainable travel, connectivity and mitigation.

Traffic generation modelling

14.32 As a result of the final assessment by Atkins being submitted after the STA was written, the final updates to the applicant’s modelling have been submitted in a document titled ‘Briefing Note: VISSIM Modelling’, dated September 2023 (Document Reference ‘WIE18037.125.TN.21.1.2’). Paragraph 1.3 of the Briefing Note (BN) confirms that it updates and supersedes the content of Section 4 and Appendices G, H and I of the STA submitted on 4th September 2023.

14.33 The highways officers have reviewed the VISSIM modelling results in relation to the performance of the modelled network. The analysis in respect the roads / junctions specified is summarised in the table below and the text following.

A4155 Little Marlow Road/Wiltshire Road Roundabout	
<i>Wiltshire Road North Arm</i>	There will be a significant increase in queueing in the AM peak hour on this arm due to development traffic, even with the Option 2 scenario (three lane approach). The AM peak hour impact on this arm of the junction is therefore not acceptable to the HA. The impact in the PM period in terms of queueing is shown to be minimal.
<i>Little Marlow Road East arm</i>	The impact is not considered to be material.
<i>Wiltshire Road South</i>	The development traffic and the proposed improvements have a minimal effect on this arm and there is little queueing on this arm.
<i>Little Marlow Road West</i>	There is significant queueing in both peak hours on this arm but specifically in the AM peak hour. The development traffic has a significant effect on this arm, increasing queueing by between 74% and 100% in the AM peak hour. In the PM peak hour, the increases are between 20% and 57%. The results show a material increase in queueing on this arm of the junction, which is not acceptable to the HA.
A4155 Little Marlow Road/Parkway Roundabout	
<i>Little Marlow Road West arm</i>	It can be concluded that the development traffic and the proposed improvements have a minimal effect on this arm but there is already some queueing.
<i>Little Marlow Road East arm:</i>	As the impact of the development traffic on this arm is so significant, it is questioned whether the results in the spreadsheet are correct or whether the ‘Do Something’ results have been swapped with the Little Marlow Road

	West arm especially as Paragraph 2.26 of the VISSIM Modelling Note states "...in the AM Peak, the impact of the additional development traffic is mitigated such that a significant decrease in queueing is observed, particularly on the A4155 (East) at Parkway...". However, the results as presented in the information submitted show that the development traffic has a material impact on the queueing at this junction, which is not acceptable to the HA.
Parkway arm	The development traffic has minimal effect on this arm and the mitigation reduces the queues on this arm in the 2027 Option 2 (3 lanes) scenario.
A404/A4155 Westhorpe Interchange	
A404 North off slip road	This arm sees a reduction in the AM peak hour with the development traffic but an increase in the PM peak hour of 44% to 57% in the PM peak hour, which is considered to be material.
Marlow Road arm (westbound approach)	This arm is significantly affected by the development traffic in the PM peak hour with queues lengths doubling. In the AM peak hour queues are already long and there are increases in queue lengths of 45% to 60%. In all 'development scenarios the maximum queues extend beyond the site access junction having the potential to block it. Even the average queues approach the site access junction in the AM peak hour.
A404 South off slip road	This arm sees a significant reduction in queue length in the AM peak hour with the development traffic but an increase of 54% to 74% in the PM peak hour.
Little Marlow Road arm (eastbound approach)	It can be concluded that the impact of the development traffic is minimal on this arm in both peak hours.
A4155 Marlow Road/Pump Lane South/Site Access	
Pump Lane South	The development traffic and the proposed improvements have a minimal effect on this arm and there is minimal queueing.
Marlow Road East (westbound approach)	There is an unacceptable increase in queueing on this arm in the AM peak hour due to the priority give way to the Marlow Road West arm.
Site Access	Queues on the site access arm are long in the PM peak hour. It is not clear how queues of this length will impact on the internal operation of the development and the applicant has not provided any evidence to show that it would not have a detrimental impact. As it stands the HA has concerns over the operation of a new form of junction providing access to new development and the associated impacts both on and off the site that the shown level of queueing could have.
Marlow Road West (eastbound approach)	The queues on this arm are minimal and are not shown to block back to the Westhorpe Interchange.
A4155 Marlow Road/Westhorpe Farm Lane	
Marlow Road West (eastbound approach)	There is minimal queueing on this arm but the development has an effect in the AM peak hour increasing queue lengths in Managed scenarios to 53 to 77 metres.
Marlow Road East (westbound approach)	The proposed development results in significant queue increases in the AM peak hour on this arm.
Westhorpe Farm Lane:	No material change.

A4155 Little Marlow Road/Wiltshire Road Roundabout

- 14.34 It is concluded that the development traffic has a significant effect on the Wiltshire Road North and Little Marlow Road West arms of this junction in the AM peak hour with queue lengths increasing by between 27% to 100%. This is considered a severe impact on an already congested junction.

A4155 Little Marlow Road/Parkway Roundabout

- 14.35 It is concluded that the development has an unacceptable impact on the Little Marlow East arm with queue lengths increasing by 72% to 445% but minimal effect on the other arms. However, it is considered that there might be an error in the data of the spreadsheet and the increase is in fact on the Little Marlow Road West arm which would correspond with the Wiltshire Road junction and paragraph 2.26 of the VISSIM Modelling Note. The mitigation slightly improves the queues on Parkway. Nevertheless, it is considered that the proposed development has a severe impact on an already congested junction.

A404/A4155 Westhorpe Interchange

- 14.36 The development traffic has a severe impact on the Marlow Road arm with queue lengths doubling in the PM peak hour and queue lengths of 220 metres in AM managed scenario. In all development scenarios the maximum queues extend beyond the site access junction having the potential to block its operation and consequent impacts on its other arms. The PM also sees increases on the A404 South off Slip road of 54% to 74% although there is a significant improvement in queue length in the AM peak hour. The AM North off slip road sees a small reduction in the AM peak hour with the development traffic but an increase in the PM peak hour of 44 to 57%.
- 14.37 It is considered that the proposed development will result in an unacceptable material impact on the Marlow Road arm of the junction, which forms part of the highway network under the control of the Local HA. National Highways also seek further information with regards to the design and impact on their part of the network.

A4155 Marlow Road/Pump Lane South/Site Access

- 14.38 There is an unacceptable increase in queueing on this arm in the AM peak hour due to the priority give way to the Marlow Road West arm. The development traffic impact is therefore considered to be severe.

A4155 Marlow Road/Westhorpe Farm Lane

- 14.39 There is significant continuous queueing on the Marlow Road East arm resulting from the impact of the development traffic causing blocking back through the site access junction. The impact is considered to be severe.

Summary

14.40 The proposed development will result in significant increases in queueing in the AM peak hour in particular on the A4155 through the modelled area affecting a number of junctions with long queues also occurring on the site access itself. Highway officers consider that the VISSIM modelling demonstrates that the development traffic will result in a severe impact on the operation of the local highway network.

Wide Area Network Assessment

14.41 A wide area network assessment has been undertaken. The analysis has been reviewed and the following can be concluded:

- **Handy Cross Roundabout** - The impact of the development proposals on the operation of the A4010 arm and the Marlow Hill arm of the Handy Cross Interchange is likely to be minimal and mitigation measures are therefore not required on these arms.
- **A404 / Marlow Road 'Bisham' Roundabout** - This junction is not located in Buckinghamshire. National Highways in their response (29.9.23) notes the applicant has undertaken queue surveys at Bisham Roundabout in September 2023. *This data and commentary of base model validation is outstanding. Applicant to provide queue data and accompanying commentary demonstrating the A404 Bisham Roundabout has been appropriately validated. Additionally, the Operational Management Plan identified as a previous action will be a useful mechanism to support with mitigating development impact to an acceptable level.*
- **Wiltshire Road / A4155 Little Marlow Road Roundabout** - A review of this junction has been conducted as part of the VISSIM model review (reported above).
- **Newtown Road / A4155 Little Marlow Road / Bobmore Lane crossroads** – It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **Glade Road / A4155 Little Marlow Road priority T-junction** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **Wycombe Road / A4155 Little Marlow Road priority T-junction** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **A4155 Chapel Street / B482 Dean Street / A4155 Marlow Road mini roundabout** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **High Street / A4155 Marlow Road / A4155 West Street mini roundabout** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **Sheepridge Lane / A4155 Marlow Road mini roundabout (Bourne End)** – Although there are errors in the modelling and it has not been possible to check the modelling output, it appears that the proposed development has a material

impact at the junction and appropriate mitigation should have been considered by the applicant. It has not been demonstrated that the proposed development will not have a severe impact on the junction.

- **Winchbottom Lane / A4155 Marlow Road priority T-junction** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **Blind Lane / A4155 Marlow Road priority T-junction** - It has not been demonstrated that the proposed development will not have a severe impact on the junction.
- **A4155 Cores End Road / The Parade / Station Road mini roundabout** - Although there are errors in the modelling and it has not been possible to check the modelling output, it appears that the proposed development has a material impact at the junction and mitigation is required. The applicant has not however proposed mitigation for this junction and therefore it has not been demonstrated that the development will not have a severe impact on this junction.

14.42 It has not been demonstrated that the proposed development will not have a severe impact on a significant number of the junction considered.

Sustainable Travel Strategy

14.43 *Mode Share Target:* The mode shift targets that the applicant is aiming towards - maximum 60% car driver mode share through a circa 24% mode shift to Public Transport (bus and rail) and Active Travel (walking & cycling) - are considered to be ambitious. In order to hit the targets the applicant is going to have to achieve a significant shift away from the private car and towards the use of sustainable forms of transport. The applicant is aiming to achieve a 16.7% uptake in sustainable transport modes and a 24.2% reduction in the use of private cars and vans. They are also targeting a 7.5% uptake in walking and cycling. The full targets are detailed in Table 2 on page 29 of the TAA2.

14.44 The applicant has provided case studies of what they consider to be schemes in which similar sustainable transport strategies to the proposed Monitor and Manage approach have been implemented and have been successful, measured by a shift in mode share to increased use of sustainable modes. The case studies do show that good quality bus services that provide convenient travel to a number of locations do have a positive impact on modal shift. The examples also highlight the importance of excellent pedestrian and cycle links to improve travel to the site by walking and cycling.

14.45 There remains concern that the mode share targets proposed by the applicant are unrealistically ambitious, which is especially concerning as there is a reliance on these targets in order to mitigate development impacts on the road network and to ensure that parking provision on site is sufficient. It is also not possible to guarantee that the mode share targets will be met, therefore it is important that the scenario where targets are not met is tested, and that any impact arising from that scenario can be adequately mitigated.

14.46 *Travel Plan:* An updated Travel Plan has been submitted as part of the STS and reflects consultation with the Highway Authority and refinement of the Sustainable Transport Strategy (STS) for the site. It is concluded that the Travel Plan is well thought out with some good detail, however amendments and additional information would be required to ensure that the Travel Plan would be effective.

14.47 *Monitor and Manage:* The proposed Monitor and Manage approach main aims are to

- Provide the framework for delivery of the mode share targets for the site.
- Deliver the mechanism for monitoring vehicular access to the site and car park demand, and for reviewing the modal share targets in the future.
- Set the parameters for a 'Mode Share Incentive Scheme' (MSIS) to ensure achievement of mode share targets.
- Monitor travel to/from the site will be undertaken to ensure that the objectives and targets of the MSIS and the Travel Plan are met.
- Monitor parking on identified roads around the site to ensure that there is no increase in on-street parking associated with the proposed site. Should these show a significant rise in demand then further work will be undertaken to determine whether the increase in parking relates to the site. If this is the case then money can be secured through the S106 to fund (partially or fully) the implementation of car parking restrictions to manage this parking.

14.48 It is considered that the full details of the Monitor and Manage Strategy would need to be set out and agreed in the S106 Agreement that is secured as part of any planning permission. At present the full details of how it would work have not been submitted by the applicant and therefore officers are not in a position to confirm that the measures included in it would be adequate to deal with any issues arising from the proposed development.

14.49 *Public Transport - bus service improvement:* The Council's Public Transport officers consider that in principle, the suggested service provision on the main Marlow-High Wycombe service would provide a good level of connectivity to and from the site. However concerns and unanswered questions remain:

- The applicant should have considered whether the addition of a stop at High Wycombe railway station would be worth providing
- There are concerns that the running times are optimistic between High Wycombe and Maidenhead and High Wycombe and Marlow.
- It is not evident that synergies with the existing bus market have been explored to avoid duplicating resource.

14.50 Similarly the provision of a local route within Marlow and Bourne End is to be welcomed, however it is unclear from the information submitted as to whether this can, in time, replace the existing Marlow town bus service.

14.51 The new bus interchange proposed as part of the development, to be located at the Entrance Square will result in bus stops serving the site that are within a reasonable walking distance of the majority of the site.

14.52 Based on the information submitted to date, the Council's Public Transport Section have raised a number of issues that are not addressed in the information submitted and therefore they cannot confirm that they are satisfied with the public transport improvements being proposed as part of this application.

14.53 *Rail – walking and cycling connections:* Marlow Railway Station is located 1.8km from the site. Four routes have been investigated for cyclists but only the improvements on Westhorpe Interchange junction would appear to be proposed. This is addressed below as part of walking and cycling.

14.54 Bourne End station is approx. 3.8km from the site access. A new connection to Bourne End is proposed through the provision of a segregated footpath/cycleway through land in control of the applicant which would be separated from the Marlow Road (A4155) from School Lane, Little Marlow to the Marlow Road (A4155) / Sheepridge Lane Lane roundabout. It is to be noted that this is an important interchange as people from Marlow will have to change train here if they want to travel to Maidenhead and further afield as the Marlow line is a single track line operating only between Marlow and Maidenhead.

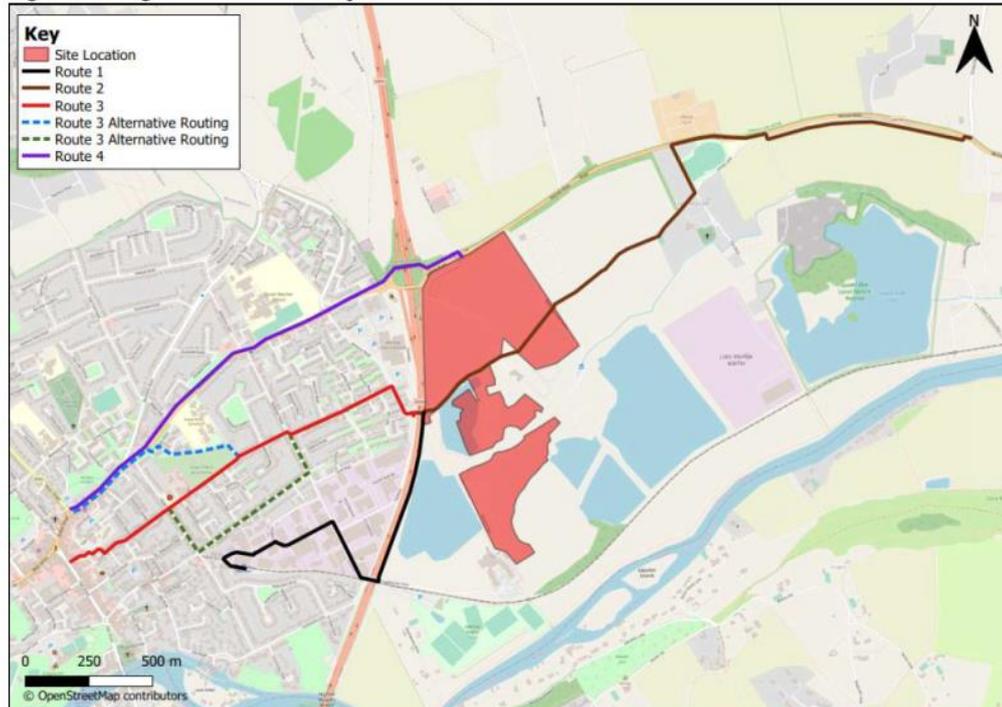
Active Travel Strategy – walking and cycling

14.55 A pedestrian and Cycling Audit carried out by the applicant was judged to lack the detail necessary in order for officers to determine that the proposed pedestrian and cycle routes were adequate and provided safe and suitable links between the site and the surrounding residential areas. The applicant has carried out a further assessment of the pedestrian and cycle routes called a 'Walking Cycling and Horse-Riding Assessment and Review' (WCHAR), in accordance with the requirements set out in the Design Manual for Roads and Bridges document GG 142. The WCHAR assessment has been reviewed and officers views on it are set out below.

14.56 The WCHAR analysis has predicted that the highest proportion of trips would route westbound from the site via the Westhorpe Interchange, with the remaining trips routing to Marlow via Volvo footbridge and/or the New Link through Fieldhouse Lane. There are also a proportion of trips that have been forecasted to route towards the east from the site via the A4155. The 4 primary routes identified to investigate existing walking and cycling conditions in order to identify the opportunities for improvements, are.;

1. Starting from Marlow Station via Fieldhouse Lane to the site
2. Through the application site (PRoW LMA/20/1) via Pound Lane and Church Lane towards Bourne End
3. A404 Footbridge to Town Centre
4. Westhorpe Interchange and Marlow Road (A4155) to Town Centre

Figure 1.1: Agreed WCHAR Study Area



14.57 Issue and concerns in relation to the routes and potential improvements are summarised below.

14.58 *Westhorpe Interchange*: The proposed alterations to the Westhorpe Interchange will be subject to assessment by National Highways in terms of safety, capacity and compliance with the Design Manual for Roads and Bridge. Discussions with National Highways has highlighted that they have not yet finalised their assessment of the junction changes and are not therefore in a position to determine the acceptability or deliverability of the proposed changes.

14.59 The absence of confirmation from National Highways that the proposed changes to the Westhorpe Interchange are acceptable, brings into doubt the applicants ability to deliver a safe and suitable walking and cycling route between the site and Marlow via the Westhorpe Interchange. Without the link across the Westhorpe Interchange the HA considers that the site would not be well connected in terms of sustainable forms of transport and therefore unlikely to achieve the mode share targets that are contained with their STS.

14.60 It is also evident that the applicant is proposing the connection across the Westhorpe Interchange as the only improvement to walking and cycling connections to the west into Marlow. Officers consider that in order achieve a site that is well connected to the local area by walking and cycling the applicant should be providing a number of route choices to make accessing different areas within Marlow as convenient as possible. At present the only cycle link is proposed to be via the main site access to the north of the site, if indeed that is deliverable. If someone wanted to cycle from the southern end of the site to a location towards the southern end of Marlow, the route they would be required to take would be

through the site to the north then out of the site, across the Westhorpe Interchange, and back down through Marlow to the south. The distance of such a route and the time taken to travel it would be greatly reduced if a further access option for cyclists was provided for toward the centre (or south) of the site. However, based on the information provided at this stage, the applicant is not proposing to deliver such an access option.

14.61 *Volvo footbridge:* The applicant states that there are a number of ways in which the footbridge could be improved to cater for pedestrians and cyclists, which would include replacing the existing steps and ramps to make them DDA compliant. Paragraph 2.23 of the STA states:
“If the monitoring to be undertaken as part of the MSIS shows that additional improvements are needed to achieve the specific targets for pedestrians and cyclists to/from the Site, the approaches to the Volvo Footbridge will be improved to provide DDA compliant ramps and stairs. This will both improve this route for pedestrians and make it available for cyclists. The mechanism for this monitoring will be set out in the S106 Agreement associated with the proposed development.”

14.62 It is therefore evident that improvements to the Volvo footbridge are not to be implemented from the outset and would only be provided at a later stage should the monitoring proposed by the applicant show that improvements are necessary. Officers do not agree with the principle of this approach. Improvements to provide a choice of safe, suitable and attractive walking and cycling routes to the site should be in place before the site is occupied in order that they can help influence people's travel choice from the outset. This would give the best chance of convincing people to walk or cycle rather than use a private car. Not providing adequate links from the outset and then waiting for mode share targets not to be met before making improvements may mean that it is too late to then influence people to change their travel choice and in turn be too late to address any issues that may have arisen from the mode share targets not being met. It has also not been successfully demonstrated at this stage that any such improvements to the Volvo footbridge are acceptable to National Highways and deliverable on the available land.

14.63 *Fieldhouse Lane:* In relation to the potential for a link to the south of the site to Fieldhouse Lane, paragraph 2.26 of the STA states:
“A pedestrian and cycle link to Fieldhouse Lane is not proposed in association with the proposed development. The achievement of this route is within the control of BC, but not the applicant as there is third party land at the southern end of the link. BC could achieve the link through progressing the submitted Definitive Map Modification Order (DMMO) application. There will also be opportunities for achieving this link when a further planning application is submitted for the third-party land. This land having previously been the subject of a refused planning application and then a second planning application that was withdrawn.”

14.64 It is evident that a link to Fieldhouse Lane is not going to be delivered as part of this planning application. A link to Fieldhouse Lane cannot therefore be taken

into account as something that will contribute to the connectivity of the site to surrounding walking and cycling facilities.

14.65 *Other improvements:* Paragraph 2.28 of the STA states that the applicant will make a financial contribution towards the implementation of the other elements of the opportunities identified in the WCHAR assessment, which include the provision of tactile paving and dropped kerbs and signage and the conversion of the zebra crossing on Marlow Road adjacent to Bobmore Lane to a Toucan Crossing. Paragraph 2.29 also goes on to state that there are also minor improvements that potentially could be made on the routes between the A404 and Marlow town centre which include directional fingerposts and tactile paving at all crossing points.

14.66 At present the improvements proposed are uncertain in terms of details, therefore it is difficult to make a judgement on their likely effectiveness. Officers also previously advised the applicant on the need for side road junction crossings to be LTN1/20 compliant and tactile crossings alone would not be sufficient. Any improvement works to be secured, would need to be delivered by the applicant as part of an off-site highway works package. Making contributions for the Council to deliver the works is not acceptable to the Council.

Walking and cycle connections summary

14.67 The applicant appears to be offering a route into Marlow via the Westhorpe Interchange as the only walking and cycling route that is aimed at catering for walking and cycling for both able bodied people and people with mobility impairments and the deliverability of necessary improvements to this route is currently uncertain. The only other link to the west is via the Volvo footbridge and this is only useable by able bodied pedestrians and will not be an attractive or convenient route for people with mobility impairments or cyclists. It is therefore considered that as the site does not offer a choice of multiple safe and suitable pedestrian and cycle routes to allow people to access the site, the site is not well connected to Marlow and does not promote the use of sustainable forms of transport, contrary to local and national policy.

14.68 There is also uncertainty as to whether the route for pedestrians and cyclists across the Westhorpe junction will be acceptable to National Highways and therefore at present officers are not in a position to confirm the acceptability of this route.

14.69 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development (paragraph 11). The NPPF states that decisions should take account of whether opportunities for sustainable transport modes have been taken up and whether safe and suitable access to the site can be achieved for all people (paragraph 110). Developments should also be located and designed where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities (paragraph 112).

14.70 It is considered that the proposed development is not providing adequate improvements in order to exploit opportunities for the use of sustainable transport modes. The site is reliant primarily on the pedestrian/cycle route via Westhorpe, the improvements to which are yet to be agreed with National Highways and confirmed to be deliverable. Even if it were deliverable, the lack of certainty that additional routes for all users to ensure the site is permeable and well connected given its size call in to question the sustainability of the site and the prospects of it being able to meet its mode shift aspirations.

Car Parking

14.71 Car parking is provided for 1,108 spaces within in Multi-Storey Car Parks and internal on-street provision. It is accepted by the applicant that if the parking management proposals within the site are to be successful in reducing car trips to the site, then there also needs to be a mechanism by which any off-site overspill parking can be managed and restricted. This is to stop people who drive to the site and are turned away, as they are not entitled to park on site, parking within Marlow to the west and Little Marlow to the east, resulting in additional pressure on the local highway network.

14.72 The STA confirms that as part of the Mode Share Incentive Scheme (MSIS) it is proposed to monitor whether there is any increase in on-street parking on the roads around the film studio site as a result of the development and where they consider there could be a potential for on-street parking to occur. The area covers roads in Little Marlow to the east of the site and Marlow to the west of the site which are within a reasonable walking distance of the site, which the applicant has identified as a 10 minute walking distance.

14.73 The applicant states that in the event that there is additional on-street parking associated with the development then a financial contribution will be made available to fund the Traffic Regulation Order (TRO) process to manage the parking on the identified roads. It is suggested that in order to minimise any implications for residents on the identified roads the parking restrictions could simply be to restrict parking for 1 hour on weekdays between 1100 and 1200, consistent with other areas where restrictions are used to manage commuter parking.

14.74 Officers consider that the principles of what is being proposed to manage any impacts of any identified off-site parking associated with the development site are acceptable, however as the final details of the strategy (e.g. scope of surveys and the ability to secure appropriate mitigation) have not been submitted and agreed, the HA is not in a position to confirm that the measures are acceptable.

Internal site road layout

14.75 In response to concerns raised by highways officers that the site layout should be safe and suitable the applicant advises that that a Site Management Plan will be prepared to outline how vehicles are expected to operate whilst on site, including the use of supervised manoeuvres. As this is a detailed application, adequate detail is required on the proposed operation of the site. While some tracking information has been provided it is considered that sufficient detail has not been submitted to allow the officers to conclude that the internal site layout is safe and suitable.

Conclusion

14.76 It is evident that there are issues relating to the internal layout, the Sustainable Travel Strategy, sustainable transport connectivity and traffic impact that remain unresolved and outstanding. Proposed pedestrian and cycling connections are considered to be inadequate and mode share targets are considered overly ambitious. The scale of traffic impacts on local junctions and the highway network is such that officers cannot conclude that the development is acceptable, well connected with safe and suitable access and would not lead to severe and unacceptable impacts on road safety and network operation. The proposals represent unsustainable development and are contrary to local plan policy CP13 and DM33 and the National Planning Policy Framework. The harm resulting would be significant, attracting negative weight, which will be carried forward to the planning balance.

15 Air Quality

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the infrastructure to support growth

POLICY DM20- Matters to be determined in accordance with the NPPF

POLICY DM35- Placemaking and Design Quality

Air Quality SPD (SPD) (March 2020)

15.1 Policy DM20 identifies air pollution as a matter to be determined in accordance with the NPPF.

15.2 The Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development, and minimising pollution is part of the environmental objective, one of three overarching objectives. Paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution. Paragraph 185 states that decisions should also ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects), of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site and the wider area to impacts that could arise from the development.

- 15.3 The Framework Paragraph 186 states that decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. "Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan".
- 15.4 The Site is not within an Air Quality Management Area; however, AQMA No.3 (Marlow) is approximately 900m west of the Site. Air Quality is addressed at Chapter 9 of the Environmental Statement.
- 15.5 The Environmental Statement (ES) states that the main likely effects on local air quality during demolition and construction relate to nuisance dust and exhaust emissions from construction vehicles and plant, and a range of measures would be set out in the Construction and Environmental Management Plan (CEMP) and therefore, it is considered effects due to dust emissions would be negligible.
- 15.6 The ES further states that a detailed modelling exercise has been undertaken to assess likely effects on local air quality associated with changes to road traffic from the development. The modelling indicates levels of nitrogen dioxide and particulates would not exceed nationally accepted limits at any of the nearby residential properties or within the development. It is concluded that the effect of the Development on levels of nitrogen dioxide and particulates would be negligible.
- 15.7 It is noted that the Sustainable Transport Strategy (STS), sets out a range of transport measures to limit air pollution during use, namely:
- I. 20% parking spaces having EV charging points with passive provision on the remainder;
 - II. building services will be fossil fuel free; and,
 - III. measures proposed to promote walking, cycling and public transport.
- 15.8 The Environmental Health Officer notes that the assessment states that the site is a high-risk site in relation to nuisance dust emissions and the mitigation measures would be included within a Construction Environmental Management Plan (CEMP) to be secured via a planning condition and implemented to prevent the release of dust to the atmosphere and / or being deposited on nearby receptors. It is recommended that pre-commencement condition requiring a Dust Management Plan be developed either as a standalone document or as part of a CEMP.
- 15.9 The development has the potential to increase traffic flows and air pollution from vehicle exhausts. As harmful effects on Chiltern Beechwoods SAC (Bisham

Woods) and Burnham Beeches SAC which lie within 200m of the A404 and A335 respectively cannot be ruled out, an assessment as required under the Habitat Regulations 2017 has been undertaken. Traffic analysis / predicted changes to traffic indicated that likely significant effects on Burnham Beeches SAC can be ruled out but cannot be ruled out in respect of Chiltern Beechwoods (Bisham Woods) SAC. An Appropriate Assessment involving air pollution analysis was therefore carried out and it was found that although the concentration of NOx in the atmosphere is predicted to rise as a consequence of the development, concentrations do not exceed critical levels and that the levels predicted in 2027 are below current levels reflecting anticipated improvements in air quality across the wider environment. Therefore it is considered that an adverse effect on the integrity of the SAC can be ruled out. In their response dated 9 February 2023 Natural England concurred with this.

- 15.10 Therefore, it can be concluded that air quality has been taken into account, potential harms identified, and mitigation put forward to manage those harms. As such, the provisions of the NPPF have been complied with.

16 Ecology & Biodiversity

Wycombe District Local Plan (August 2019):

POLICY CP7 - Delivering the Infrastructure to Support Growth

POLICY CP9 - Sense of Place

POLICY CP10- Green infrastructure and the Natural Environment

POLICY RUR4 – Little Marlow Lakes Country Park

POLICY DM34- Delivering Green Infrastructure and Biodiversity in Development

Wycombe District Adopted Delivery And Site Allocations Plan (DAS) (2013):

POLICY DM11- Green networks and infrastructure

POLICY DM12- Green Spaces

POLICY DM13- Conservation and enhancements of sites, habitats and species of biodiversity and geodiversity importance

POLICY DM14- Biodiversity in Development

POLICY DM15 – Protection and enhancement of river and stream corridors

Biodiversity Net Gain SPD (2022)

- 16.1 Section 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act) places a duty on public authorities to have regard to the conservation and enhancement of biodiversity.
- 16.2 Schedule 14 of the Environment Act 2021 requires that development subject to planning permission in England, provides 10% uplift in Biodiversity net Gain. This will become a mandatory from January 2024. Sections 98 and 99 of the Environment Act 2021, introduced the requirement of biodiversity gain on planning applications. Biodiversity uplift is supported by National and Local planning policy, as outlined below.

- 16.3 Local Plan Policy CP7 - Delivering the Infrastructure to Support Growth, requires development to contribute to Green Infrastructure including biodiversity improvements.
- 16.4 Policy CP9 – Sense of Place, seeks to conserve the natural environment and implementing measures for enhancement.
- 16.5 Policy CP10 - Green infrastructure and the Natural Environment, seeks a net gain in biodiversity and to ensure through development management policies that all development is required to maximise the opportunities to protect, enhance, expand, connect, improve and use the existing green infrastructure. Policy RUR4 - Little Marlow Lakes Country Park, states that any development within the Country Park should provide for environmental improvements including ecological and biodiversity enhancements and that any development close to an existing waterbody / wetland feature should protect and enhance that feature's ecological value, biodiversity, and its natural setting within the Country Park.
- 16.6 Policy DM34 - Delivering Green Infrastructure and Biodiversity in Development, requires all development to protect and enhance both biodiversity and green infrastructure features and networks on and off site for the lifetime of the development. It requires the preparation of proportionate assessments and management plans and to demonstrate how the mitigation hierarchy has been applied by following a sequential approach to avoid, minimise, mitigate, and finally compensate for (on then off-site) any harm to biodiversity. It states that if significant harm cannot be avoided in this way, development will not be permitted. The policy requires amongst other things: To secure adequate buffers to valuable habitats; achieve a future canopy cover of 25%; and, make provision for long term management and maintenance of green infrastructure and biodiversity assets.
- 16.7 DAS Policy DM11 - Green networks and infrastructure, requires special attention be given to the conservation and enhancement of biodiversity.
- 16.8 Policy DM13- Conservation and enhancements of sites, habitats and species of biodiversity and geodiversity importance, states that development proposals which would harm directly or indirectly other designated sites of nature conservation or geological interest or protected species will only be permitted where it has been demonstrated that:
- a. there is no suitable alternative site for the proposed development, and
 - b. the impact can be mitigated or compensated to achieve a net overall gain in biodiversity or geodiversity, and
 - c. it has been clearly demonstrated that the benefits of the development outweigh the harm to the biodiversity or geological conservation interests.
- Development proposals in or potentially affecting a designated site, important habitat or protected species will be required to be accompanied by reports relevant to the impacts of the development on the species or features of interest on the site.

- 16.9 Policy DM14- Biodiversity in Development, states that all development proposals should be designed to maximise biodiversity by conserving, enhancing or extending existing resources or creating new areas or features, and where potential biodiversity interest is identified on a site or the development creates an opportunity to increase biodiversity, the Council will require an ecological survey and report to be submitted which demonstrates how this will be addressed.
- 16.10 Policy DM15 – Protection and enhancement of river and stream corridors, states that planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor; development should seek to conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design. It further states that planning permission will only be granted for proposals which do not involve the culverting of watercourses and that development proposals adjacent to or containing a watercourse should provide or retain a 10m buffer between the top of the river bank and the development, and include a long term landscape and ecological management plan for this buffer.
- 16.11 The Biodiversity Net Gain SPD (2022) sets out guidance on how biodiversity net gain can be delivered in Buckinghamshire.
- 16.12 The NPPF paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils and minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 16.13 Paragraph 180 a) of the Framework states that when determining planning applications, local planning authorities should refuse planning permission if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. Paragraph 180 b) states that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. Point c) of paragraph 180 refers to the need to conserve or enhance biodiversity, including securing measurable net gains.
- 16.14 Paragraph 181 of the NPPF states that the following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites⁶⁴; and c) sites identified, or required, as compensatory measures for adverse effects on

habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. Paragraph 182 of the Framework states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Designations and Habitat Regulations 2017

16.15 The site itself is not subject to any statutory designations for nature conservation. A number of statutory designated sites are located within 10km of the Site:

- Chiltern Beechwoods Special Area of Conservation (SAC) (Bisham Wood) c.750m southwest.

The location next to the A404 means that it is potentially susceptible to increases in air pollution as a result of increases in construction or operational traffic.

- Cock Marsh Site of Special Scientific Interest (SSSI) c.1.3 km south-east.

This is considered sufficiently separated from the site for direct impacts to be reasonably ruled out.

- Bisham Woods SSSI / Local Nature Reserve (LNR) c.1.5 km south

Given the separation from the Site, direct impacts are not anticipated. Given the nature of the development significant increases in recreational pressure are not anticipated. The location of this designation next to the A404 means that it is potentially susceptible to increases in air pollution as a result of increases in construction or operational traffic.

- Fern House Gravel Pit SSSI c. 1.56km north-east.

This is designated on the basis of its geological interest and therefore any effects can be ruled out.

16.16 A Shadow Habitat Regulations Assessment (HRA) (Document 26, May 2022) and the Technical Note-Habitats Regulations Assessment March 2023 (Appendix 8 – Addendum Planning Statement – HRA Technical Note) has been prepared and submitted as part the application documentation. This provides relevant information to inform an HRA to be carried out according to the statutory procedures laid out in the Habitats Regulations 2017, as amended. It is stated that the only factor requiring appropriate assessment is the potential impact of air pollution on the woodland qualifying feature of the Bisham Woods component of the Chilterns Beechwoods SAC. The environmental assessment has concluded that likely direct and indirect effects would not be significant.

16.17 Buckinghamshire Council has carried out a HRA Appropriate Assessment as required by The Conservation of Habitats and Species Regulations 2017 (as amended), to assess whether there are likely significant effects on the Chiltern Beechwoods Special Area of Conservation (SAC) and Burnham Beeches Special Area of Conservation (SAC) arising from this development, either alone or in

combination with other plans and projects. The Council does not accept the outcomes stated in the applicant's Shadow HRA, that the development will not result in any adverse effect on the integrity of the Chiltern Beechwood SAC nor Burnham Beeches SAC, either alone or in-combination.

16.18 Regarding the identified SANG at Spade Oak (Refer to paragraphs 6.8 to 6.11 of this report) it was noted that this identified mitigation measures at Little Marlow Lakes Country Park utilising land within the Council's ownership and the existing rights of way network, including improvements to footpaths/cycleways, provision of new signposts, Way markers and information boards, dog waste bins, benches and a new car park. This includes the site the subject of the application and improvements to footpaths within the site. The submitted HRA assessment explained that a management plan will be prepared by the end of 2023 to deliver a SANG. As a result of this commitment by the Council and the progress to date to deliver the Spade Oak SANG to address any risk of undermining of the recreational pressure mitigation in place for Allocation BE2 (Hollands Farm) and any Likely Significant Effects that would result either alone or in-combination, it is concluded that whilst there is the potential for the delivery of suitable alternative mitigation on the land within the Council's ownership to meet the Local Plan commitments for SANG to support the Hollands Farm and Slate Meadow allocations, and not rely on the land within the Marlow Film studio red edge land for such mitigation there is no certainty at this stage over its delivery.

16.19 Natural England have objected to the proposals and advised that, a revised SANG proposal including a masterplan and SANG Management Plan is required in order to remove their objection to the proposed application. They state that new development should not undermine the purpose of a SANG. It should be a semi-natural greenspace that will divert visits from the SAC to alleviate the pressure from recreation. Therefore, noise and visual impacts from the film studios would need to be mitigated.

16.20 Thus the conclusions relating to the impact of the development on recreational pressure on Burnham Beeches is that likely significant effects cannot be ruled out either alone or in combination with other plans and projects. In terms of visual impact and noise affecting the identified Spade Oak SANG likely significant effects cannot be ruled out.

16.21 In terms of Air Quality, Natural England in their comments 9.2.23 state. *Natural England notes that the Air Quality assessment provided with the consultation has screened the proposal to check for the likelihood of significant effects from aerial emissions on the Chilterns Beechwoods SAC. The assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of information provided, Natural England concurs with this view.*

16.22 Plot 5 is partially encompassed in areas mapped within Marlow Gravel Pits Biological Notification Site (BNS). This is a non-statutory designation primarily for

its bird interest. It is considered that there is some potential for clearance and construction activity to result in disturbance of bird populations making use of Westhorpe Lake, and other large water bodies within the BNS to the east. The environmental assessment has concluded that likely direct impacts are likely to be not significant on the BNS during the operation of the site (operation of the studios once construction completed), given that the habitats of significant value wetland birds (the primary reason for the designation of the BNS) are on the periphery of the site, or else wholly outside of the site and are for the most part retained. Indirect effects would not be significant. The operational backlot within Plot 5 will require occasional construction activity to build and dismantle film sets during production. Both the construction / dismantling and filming operations could result in both lighting and noise disturbance to habitats immediately adjacent to the backlot. However, the location of the backlot centrally within Plot 5 has provided a retained vegetative buffer to those habitats of most value to wetland bird assemblages associated with the BNS. Additionally, a 3m bund has been designed around the northern edge and southern tip of Plot 5 which will further reduce the noise received in surrounding habitats. As such the likely indirect impact would be not significant.

- 16.23 Longridge WHS Local Wildlife Site (LWS) is located c.900m south. This designation is considered sufficiently separated for potential impacts to be reasonably ruled out.

Design approach and Ecology

- 16.24 The majority of the proposed development is located to the north of the site (Plots 1 – 3) which requires the clearance of the majority of habitats within these plots. The installation of access roads, the Culture and Skills Academy in Plot 4, the backlot and the bridge connecting Plots 4 & 5 results in the loss of habitats in Plot 4 & 5. The site masterplan landscape strategy involves boundary screening and buffer planting to retained habitats but a net loss in biodiversity overall as a result of the development. It is proposed to achieve a biodiversity net gain of 20% on off-site land to the east of Little Marlow, north of Spade Oak, within the applicant's ownership. The site is c20ha in area and would be secured through the legal agreement which could also secure long-term monitoring and management.



16.25 Chapter 14 of the Environmental Statement addresses Ecology and an ecological assessment has been undertaken to evaluate the potential impacts of the proposed Development upon ecologically designated sites as well as those habitats and species present within the site and immediate surrounding area. A number of embedded mitigation and design features have been incorporated into the scheme. These include: a drainage strategy to prevent adverse effects occurring to Westhorpe Lake and Westhorpe watercourse; a 'Backlot Operation Management Plan' to address potential impacts arising from the operation of the proposed backlot within Plot 5; a lighting strategy to prevent unnecessary light spill on those habitats to be retained and created; an outline Construction Environmental Management Plan (CEMP). A Landscape and Ecological Management Plan (LEMP) would be secured by condition to safeguard the long-term ecological value of those habitats to be retained and created. A Preliminary Ecological Design Strategy (draft) has also been submitted with details of BNG and mitigation.

Habitats and Biodiversity Net Gain (BNG)

16.26 The historical use of the site for quarrying and then landfill has impacted upon the habitats that have been retained and those that have developed. This has made classification of some areas of the site more complicated. A key reason for the difficulty in classification of some areas is that they have a shifting mosaic which is evident at different scales. This characteristic has created a debate over whether some areas of the site are best described as 'Open Mosaic Habitat on Previously Developed Land' (OMHPDL) which is a Priority Habitat/Habitat of Principal Importance.

16.27 The Ecology Officer considers that the majority of the criteria which is important in classifying an area as OMHPDL are met in respect of Plots 4 and 5. It points the direction of the way these areas should be used and managed into the future and how this could lead to areas of them being more definitively OMHPDL.

16.28 The significance of the categorisation of habitats as OMHPDL or otherwise, is important because :

- OMHPDL is a priority habitat which means that Wycombe District planning policy DM13 places additional tests which need to be met if it is to be lost or damaged.
- OMHPDL has high distinctiveness in the BNG metric and therefore requires greater and more specific compensation.
- The habitats which are created to compensate for loss need to be designed to replicate what is lost to the best possible degree.

16.29 Westhorpe watercourse which runs across the site from the Newt ditch, has been heavily modified with a variety of features, so that it has features of a watercourse but also has features more closely associated with a standing water body. The applicant has put forward mitigation, compensation and enhancement measures aimed at addressing the impact of the construction of a crossing between plot 4 and plot 5. Proposals seek to both mitigate the impacts and also compensate them through enhancements which have value from a river perspective and the perspective of an area of standing water.

16.30 The value of habitats, hedgerows and water courses has been assessed using the Defra metric 3 (in line with Defra guidance). The latest version submitted (04/08/2023) records the overall number of baseline habitat units as 199.68 and the overall number of baseline hedgerow units as 11.48. The proposals will see the number of on site habitat units fall to 173.72 (net loss of -13%) and hedgerow units increase to 11.77 (net gain of 2.56%).

16.31 An offset site has been acquired quite close to the site which has been assessed to have a baseline value of 43.33 habitat units and 0 hedgerow units. The suggestion is to increase the habitat units of the offset site to 182.04 units and increase the hedgerow units to 3.03 units. With the offset site the total biodiversity net gain of habitat units would be 112.75 (56.47%) and a net gain in hedgerow units of 3.32 (28.94%). The applicants are offering a 20% net gain to be secured off site through a S106 agreement.

16.32 Some of the baseline information might be considered to be pessimistic and some of the proposed number of units to be created (both on and off site) could be considered to be optimistic. The Ecologist considers that through careful detailed design of the proposals it can be possible to achieve a net gain of greater than 20%. The submitted Preliminary Ecological Design Strategy (Draft) is considered to establish the relevant principles with the final direction of travel would be set through an Ecological Design Strategy (EDS) and Habitat Management and Monitoring Plan (HMMP).

16.33 **Westhorpe Watercourse:** A vehicular crossing culvert structure is proposed between Plot 4 and 5 to provide access to the backlot. Policy DM15 – Protection and enhancement of river and stream corridors, states that planning permission will only be granted for proposals which do not involve the culverting of

watercourses. The applicant has submitted a supporting technical note (Planning Statement Addendum March 2023 Appendix 7A) which argues that the proposed solution, is considered to be optimal insofar as it minimises its height above the water level thereby minimising its impact on the built and natural environment, whilst also not having a detrimental impact on ecology or waterflow. The applicant further argues that Policy DM15 seeks to preserve / enhance the ecological value of the watercourse and it has been demonstrated that the scheme can deliver significant ecological betterment both on land and in an aquatic environment, therefore, the fundamental objective of the policy has been met.

16.34 The Preliminary Ecological Design Strategy (Draft), The Westhorpe Watercourse: Biodiversity Net Gain Feasibility Assessment and the four different copies of metric 4 set out different scenarios for addressing the impacts upon the Westhorpe watercourse crossing. These include onsite measures in the form of reprofiling and increasing marginal vegetation adjacent to the crossing and the proposed bridge spans. They also include off site enhancements on a section of heavily shaded watercourse on the offset site adjacent to council owned land. The suggestions are not detailed at this point, but it is shown in the metric that they would have the potential to ensure that there can be a biodiversity net gain on the river metric of up to 0.237 river units (81.72%).

16.35 Suggested enhancements in the Preliminary Ecological Design Strategy (Draft) also look to address the requirements of the Environment Agency for enhancements to Westhorpe Lake floating rafts on the edge of the Lake. The enhancements proposed will not only benefit wildlife but will probably also have a positive impact upon the amenity/landscape value of these locations which ties in with wider objectives.

Species

16.36 The Habitat Regulations 2017 aim to protect habitat and species of European importance. The PPG provides standing advice in relation to protected species. This sets out the protection status for each of the species, together with avoidance, mitigation and compensation measures. The standing advice also relates how and when to conduct surveys for protected species. Natural England and Defra guidance seek to avoid harming or disturbing protected species proposals could reduce the size or alter the layout to retain the important habitat features, plan for construction work to be carried out to avoid sensitive times, such as the breeding season for wild birds. If it's not possible to completely avoid harm, disruption should be as minimal as possible.

16.37 The PPG also sets out the Protected Species Licensing Requirements. The guidance sets out that authorities must be satisfied that if a licence is needed, it is likely to be granted by Natural England or Defra before granting planning permission. The three licensing test are:

- the activity is for a certain purpose, for example it's in the public interest to build a new residential development

- there's no satisfactory alternative that will cause less harm to the species
- the development does not harm the long-term conservation status of the species.

16.38 **Birds:** Seventy-one species of bird were recorded within the site and many of these were considered to be breeding or possibly breeding including the Schedule 1 Species red kite, kingfisher and Cetti's warbler. A total of 62 bird species were recorded during wintering bird surveys. The clearance of grassland, woodland has the potential to result in the destruction of bird's nests if carried out during the nesting season. The loss of large areas of grassland required within Plots 1 – 3 would result in a permanent reduction in the availability of nesting habitat for low numbers of skylark found to make use of the site. The loss of scrub, grassland, and broadleaved woodland may reduce the availability of foraging habitat for species such as willow warbler, starling, and song thrush.

16.39 **Hedgehog:** Clearance of scrub / woodland within Plots 4 / 5 has the potential to result in the killing injury of hedgehog that may use the site for foraging, shelter or hibernation. The construction of roads which intersect the site and degradation of hedgerow which runs north to south along the eastern edge of Plots 1 / 2a could also restrict the movement of this species though the local area.

16.40 **Reptiles:** Survey has identified slow worm and grass snake on site in very low numbers, all within Plot 4 / 5. Clearance of habitats within Plots 4 & 5 has the potential to result in the killing and injury of individual slow worm and grass snake.

16.41 **Invertebrates:** Survey recorded a total of 130 species, including twelve species of importance. This constitutes 9.2% of the total species recorded, which is a high percentage of scarce species. The principal driver for the diversity appears to be the mosaic of different habitat types and features in proximity to one another, allowing for a wide variety of niches to develop. The mosaic of habitats in Plot 4 / 5, including relatively floristically diverse grassland, aquatic habitat, woodland and scrub is relatively high value.

16.42 **Bats:** No roosts were identified during the surveys but the site was found to support activity of at least 8 species of foraging and commuting bats, including barbastelle. Although the diversity of bats using the site is considered high, activity was generally not considered to be, and was dominated by common and widespread species soprano pipistrelle and common pipistrelle.

16.43 The proposed loss of existing habitats to facilitate the development has the potential to impact upon foraging and commuting bats through habitat loss (and associated decrease in prey abundance) and the fragmentation of commuting routes, particularly along Westhorpe watercourse via the construction of an access bridge between Plots 4 & 5. In addition to all of the bat species being strongly legally protected, some of the other bats are also priority species, therefore, in accordance with the enhanced NERC duty, there is a need to ensure that these species are both protected and enhanced.

16.44 **Great Crested Newts:** No records of great crested newt (GCN) were returned within 1km of the Site. All relevant and accessible water bodies were subject to eDNA survey to assess the status of GCN – all of which yielded negative results.

16.45 Under the Habitats Directive mentioned above a licensing system is in place to permit otherwise unlawful activities and can only be granted for certain purposes. Natural England guidance sets out the relevant tests to be considered. The Local Planning Authority should have regard to the three tests that need to be satisfied before Natural England can issue such a licence. As there is no evidence of bat roosts on site or GCN it is not considered that licensing would be required.

16.46 **Badgers:** The site was recorded as being used by foraging and commuting badgers, with one main sett and one annex sett present which are to be retained through development.

16.47 The proposals will have an impact upon some species through loss of their habitat but some of the onsite proposals will at least in part compensate for the impacts. Green roofs will provide some compensatory habitats for invertebrate species. Wherever possible, plant species which are associated with the priority or rare invertebrates should be included in the green roof plant mixes. Enhancements to some of the areas on site should help benefit reptiles and may benefit other species.

16.48 The loss of wide areas of floristically diverse habitat, which is known to be used by species such as foraging and commuting bats, foraging barn owls, ground nesting birds such as sky lark and many other species (which may not be priority species and so have not been identified), will be lost from the site and will not be adequately compensated for unless the offsetting area is designed to accommodate them.

16.49 Other impacts of the development (both through construction and operation) on species (and to some extent on habitats) would need to be addressed through detailed mitigation measures. It is already proposed to include green roofs on many of the buildings and also some green walls, however there are many other ecological enhancement features which could be included to help ensure there are biodiversity net gains for species as well.

16.50 It is understood that since the updated surveys of the waterbodies on site have shown no indication of the presence of Great Crested Newts, there is considered to be no need for district licencing and Reasonable Avoidance measures will be sufficient.

Overall assessment

16.51 It is considered that the potential of the development site and the offset site to achieve a significant biodiversity net gain has been proven. However, it is by no

means guaranteed and conditions and s106 obligations would be required. The loss of features on site which are akin to OMHPDL is to be partially compensated for through the enhancement of some less distinctive habitats to create OMHPDL. OMHPDL features would need to be included on the offset site to meet the DM13 policy requirement.

- 16.52 The impacts the proposals will have upon the Westhorpe watercourse from a BNG perspective are considered to be sufficiently compensated for in the scenario where both on and off site enhancements would occur. Although policy DM15 would apply to this crossing, it is accepted for the reasons given above that it would not be appropriate for this policy to form a reason for objecting to the proposal. It will however be necessary for the final design to have minimisation of ecological impact and maximisation of value as a core objective.
- 16.53 The design of both on and off site habitats and features would need to be comprehensive and detailed to ensure that species which are currently found on site do not lose out as a result of the development. The off site area would need to accommodate good ground nesting for skylark, the right conditions to enable foraging for barn owl and bats, habitats for small mammals and reptiles and nesting birds. On site the green roofs would need to include plant species which accommodate a range of invertebrates, including those currently found on site. The green walls could also accommodate bird and bat boxes and insect hotel features to increase their diversity.
- 16.54 Reptiles could be accommodated particularly well in the areas which will be enhanced OMHPDL.
- 16.55 A Construction Environmental Management Plan (Biodiversity) would be required to address ecological mitigation measures during the construction phase of the development.
- 16.56 An Ecological Mitigation Management Plan would be required to set out mitigation measures which would be required through the ongoing use of the site, such as lighting, use of the back lot and use of other areas where the successful provision of biodiversity units would be threatened by other uses of an area.
- 16.57 The scale of development is such that it would result in ecological impacts and a number of adverse effects have been identified through the Environmental Assessment. Overall it is considered that the proposed development on this site is possible whilst minimising, mitigating and compensating for impacts on protected, priority and notable species and habitats and delivering a net gain in biodiversity off-site. In this regard, subject to securing the required mitigation the proposals are considered to be in accordance with Local Plan policies and national policy. A net gain in biodiversity is a significant benefit of the scheme and this is carried forward to the overall planning balance.

16.58 However because of potential impact including visual impact and noise affecting the identified Spade Oak SANG provision, significant impacts through recreational pressure on Burnham Beeches SAC cannot be ruled out. The development is likely to have a significant effect upon the integrity of the SAC with the result that the Council would be required to refuse this planning application. This results in considerable harm which is afforded significant weight in the planning balance.

17 Climate Change and Building Sustainability

Wycombe District Local Plan (August 2019):

POLICYCP12- Climate Change

POLICY DM33- Managing Carbon Emissions: Transport and Energy Generation
Air Quality SPD

17.1 Policy CP12 – Climate Change, states that the Council promotes mitigation and adaptation to climate change through:

1. *A development strategy that minimises the need to travel by allocating sites and generally directing development to locations with better services and facilities, or where they are capable of being improved.*
2. *Ensuring allocations in this Plan have taken account of climate change allowances using the information provided by the Strategic Flood Risk Assessment level 1 and 2 and through the sequential testing of sites,*
3. *and ensuring through detailed development management policy that applications fully factor in climate change in their flood risk assessments.*
4. *Integrating blue and green infrastructure into the design of new development, including the use of Sustainable Drainage Systems (SuDS).*
5. *Adopting higher water efficiency standards to contribute to alleviating water stress across the District.*
6. *Introducing a requirement that new development should be designed to contribute towards mitigating urban heat island effects and increases in air pollution.*
7. *Supporting the integration of renewable technologies into residential and commercial developments of all sizes and the use of district heating or combined heat and power on larger scale developments.*

17.2 Policy DM33 - Managing Carbon Emissions: Transport and Energy Generation, states that development is required to:

- (a) *Be located to provide safe, direct and convenient access to jobs, services and facilities via sustainable transport modes;*
- (b) *Be provided with safe and convenient access to the local highway network for all modes and appropriate access for servicing;*
- (c) *Make provision for alternative vehicle types and fuels;*
- (d) *Include measures to reduce reliance on single occupancy car trips and to increase the use of sustainable transport modes;*

- (e) Provide for parking sufficient to meet the needs of future occupants and to ensure there is no significant adverse impact from overspill parking;*
- (f) Ensure that any material adverse impacts on existing and forecast traffic conditions are mitigated;*
- (g) Integrate renewable technologies into developments;*
- (h) Investigate, and where feasible implement, district wide energy or heating schemes, for larger scale developments.*

17.3 The NPPF at paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate, and it should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure. Paragraph 154 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability from climate change, reducing greenhouse gas emissions through location, orientation and design.

17.4 Passive design features include extensive green infrastructure, including green roofs, green walls on a number of facades and 27% canopy cover over. Office workshop spaces have been designed to provide flexibility to ensure the long-term durability of the buildings and efficient use of the embodied energy over time. A sustainable urban drainage strategy, which incorporates green/blue roofs, swales/ponds/bioretenion systems and rain gardens. The Site has been designed to minimise cut and fill and minimise or avoid the import or export of materials. There is a commitment to biodiversity net gain (BNG) of 20%.

17.5 The application is accompanied by an Energy Statement and Sustainability Statement. The Energy Statement sets out the proposed strategy for reducing the development's energy demands, utilising low carbon and renewable energy sources including with photovoltaic panels on all soundstages and car parks, and ensuring the development is enabled for net zero CO₂ emissions by 2050. Designs have been developed to target ratings of very good or excellent under the BREEAM scheme. The Sustainability Statement summarises key sustainability measures that have been integrated into the design of Marlow Film.

17.6 The Environmental Statement Chapter 10 Climate Change, presents the findings of an assessment of the likely significant effects of the development on climate change. The enabling, construction and when in use the average annual GHG emissions associated with the development have been calculated to be less than 1% of the any UK Carbon Budget and are therefore classed as of minor adverse significance and no further mitigation measures beyond those already embedded in the design are recommended.

17.7 The Climate Response Team advise that prior to construction, the modelling of all buildings proposed on site as opposed to relying on estimated baseline and actual figures and CO₂ savings and can be addressed as part of a condition. The Team welcomes the proposed installation of photovoltaic panels and air source heat pumps given the Government's targets to decarbonise the UK's electricity

system and policies CP12 and DM33 of the Wycombe Local Plan. It is considered that the Energy Statement (ES) that has been provided is suitable only as an initial, high-level estimate and a detailed Energy Statement providing a re-calculated baseline and savings based upon the final, individual building designs rather than a representative, estimated sample, is required and would be secured by condition. Evidence of waste reduction throughout the entire development, prior to occupation, could be addressed by way of condition.

17.8 In summary, officers are satisfied that the detailed strategies and measures to address sustainability and climate change / adaption requirements can be dealt with by condition. Therefore, it is considered that the proposals comply with relevant local policies and national planning policy in respect of climate change and low carbon infrastructure and energy use.

18 Flood Risk & Drainage

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the Infrastructure to Support Growth

POLICY CP12- Climate Change

POLICY DM39- Managing Flood Risk and Sustainable Drainage Systems

18.1 Local Plan Policy CP7 - Delivering the Infrastructure to Support Growth, requires provision to be made for flood management and sustainable drainage. Policy CP12 – Climate Change, promotes mitigation and adaption to climate change through requiring applications to fully factor in climate change in their flood risk assessments and designs including the use of Sustainable Drainage Systems (SuDS). Policy DM39 - Managing Flood Risk and Sustainable Drainage Systems, requires all developments to be directed to areas at least risk of flooding. In any area at risk the policy requires a flood risk assessment and evidence of compliance with the sequential test and to incorporate SuDS into the scheme.

18.2 The NPPF Paragraph 159 advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 161 of the Framework requires all plans to apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. Paragraph 162 states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. It requires the sequential test (based on the strategic flood risk assessment) approach to be used in areas known to be at risk from any form of flooding. Paragraph 163 states that if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for

the exception test will depend on the potential vulnerability of the site and of the development proposed (in line with the Flood Risk Vulnerability Classification set out in NPPF Annex 3).

18.3 NPPF paragraph 167 states that where appropriate, applications should be supported by a site specific flood risk assessment and when determining applications LPAs should ensure that flood risk is not increased elsewhere. The NPPF paragraph 169 requires that major developments incorporate sustainable drainage systems, unless there is clear evidence this would be inappropriate. Planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to, or adversely affecting, water resources (paragraph 174).

18.4 The submitted Environmental Statement describes the site as located mainly in Flood Zone 1 with parts of the Site in Flood Zone 2 and 3. *The southern tip of Plot 2A is in Flood Zone 2 and 3, however, this area will only include below ground drainage installation.*

Sequential Test Approach

18.5 It is noted that a Strategic Flood Risk Assessment (SFRA) was undertaken – Level 1 in 2014 and Level 2 in 2017 - as part of the Local Plan process. The site falls within SFRA Site Nr.70 and underwent a detailed assessment of strategic flood risk, sequential test and exception test and passed to site allocation in Wycombe District Council's 2019 Local Plan reference RUR4.

18.6 The application is accompanied by a Flood Risk Assessment (Document 10). This makes reference to the Strategic Flood Risk Assessment (SFRA) undertaken in 2014 as noted above but which initially did not otherwise address the requirement for a sequential approach to site selection.

18.7 The Environment Agency advised that as the site is within mapped flood zones 1, 2 and 3 a sequential test is required on the basis of fluvial flooding, and should also address other sources of flooding. *The sequential test should determine if there are any reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.* To address the Environment Agency's request, the applicant has submitted the document *Appendix 11J Addendum Planning Statement Flood Risk Sequential Test Information (Aecom) March 2023*. It is stated that this has been prepared to provide flood risk information to inform the Site Selection Assessment Report (*Appendix 11A Alternative Sites Selection Assessment – Included Green Belt review and Flooding Sequential Test Document 4a (Arrow) February 2023*) and therefore ensure that the application is in line with the requirements of the National Planning Policy Framework and Planning Practice Guidance (PPG): flood risk and coastal change.

18.8 The applicant states that Alternative Sites Assessment has regard to a range of site-specific, locational, sustainability and market considerations, and

demonstrates, that the site is the most sequentially preferable and deliverable within a reasonable search area where the benefits of the scheme can be secured. *No more sequentially preferable sites have been identified that could meet the necessary locational and operational requirements of the proposed scheme.* The multi-part process is summarised as:

- Stage 1 – Site Search Area
- Stage 2 – Site Size
- Stage 3 – Sift 1 (Proximity to Settlement and Location within the AONB)
- Stage 4 – Sift 2 (Achievability and Availability)
- Stage 5a – Sort 3 (Green Belt)
- Stage 5b – Sort 4 (Flood Risk)
- Stage 5c – Flood Risk and Green Belt Sift
- Stage 6a – Sort 1 (Land Use Suitability Assessments)
- Stage 6b – Sort 2 (Operator Suitability Assessments)

18.9 Sort 4 (Flood Risk) assess the sites in respect of their impact on Flood Risk using the Environment Agency flood risk maps and Strategic Flood Risk Assessments.. All sources of flooding are assessed: 1. Fluvial; 2. Ground; 3. Surface; 4. Sewer; and 5. Reservoir flooding. Other flood risk features such as the presence of rivers, key flow paths, critical drainage are also be taken into account.

18.10 At Stage 5a and 5b any sites that are sequentially preferable to the MFS site in respect of either flood risk or Green Belt impacts are taken forward for a more detailed site assessment. Sites that perform worse in respect of Green Belt harms or Flood Risk are rejected. Sites that perform the same in respect of Green Belt harms and Flood Risk are also be taken forward.

18.11 The Flood Risk Sequential Test Information document (Appendix 11J) includes details of 19 available sites identified in Stage 4 of the Site Selection Sequential Assessment, which have been assessed to determine the risk of flooding from rivers, surface water, groundwater and reservoirs to each site. The outcomes in respect of flood risk informs the Alternative Sites Assessment (ASA) the subject of the Site Selection Assessment Report (Appendix 11A).

18.12 In terms of the assessment of the submitted Sequential Test information the Planning Practice Guidance (PPG) provides guidance on its application:
“Application of the sequential approach in the plan-making and decision making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so”;
“the approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding”.

18.13 The PPG recognises that the sequential test will be defined by local circumstances relating to the catchment area for the type of development

proposed. *‘When applying the Sequential Test, a pragmatic approach on the available of alternative should be taken’.. ‘The developer should justify with evidence to the local planning authority what area of search has been used when making the application. Ultimately the local planning authority needs to be satisfied in all cases that the proposed development would be safe and not lead to increase flood risk elsewhere.’*

18.14 The sequential test information reports that of the 19 sites considered, 3 are at a greater risk of flooding than the proposed development site, 3 that may be considered more preferential in terms of the flood risk posed to the site, and the remaining 12 sites have a risk of flooding of a similar nature and scale to the proposed development site.

18.15 The 3 sites considered more preferential in terms of the flood are: CD0100 - Land at Dungrove Farm, Chesham; 46-Runnymede - Land at Great Grove Farm, Chertsey; and SHLAA-GB-SA-87 - Land between the A4147 and the M10, extending beyond the M10 to Potters Crouch and the edge of Chiswell Green. At Stage 5c of the Site Selection Sequential Assessment 2 of the 3 were rejected as both were judged to perform more poorly in Green Belt terms than the application site. The remaining site was taken forward as one of the 4 final shortlist sites assessed as Stages 6a (Land Use Suitability Assessments) and 6b (Operator Suitability Assessments). The respective scores are reproduced below. It is reported that when assessed across a range of operator requirements, the Marlow Studio Site is sequentially preferable to the other potentially deliverable sites in the search area.

	<i>Stage 6a – Sort 1 (Land Use Suitability Assessments)</i>	<i>Stage 6b – Sort 2 (Operator Suitability Assessments)</i>
<i>Marlow Film Studios site scored</i>	<i>23 (21)</i>	<i>19</i>
<i>Land at Great Grove Farm scored</i>	<i>20 (21)</i>	<i>16.5 (17.5-18.5)</i>

18.16 As stated at 8.49 it is considered that had the ASA been based on broader criteria it would likely generate more potential sites. Furthermore it is noted that 2 sites considered more preferential in terms of the flood risk posed to the site were rejected as they were judged to perform more poorly in Green Belt terms. The scoring in the final stages of the assessment is considered to be finely balanced given the judgments involved in applying the the specific criteria adopted in deriving the scores. However, in the context of the scheme before the Council for determination, and the degree of flood risk, it is considered that the flood risk sequential information does demonstrate the limited opportunities for the development to be located in areas with a lower risk of flooding.

Exceptions Test

18.17 The supporting Flood Risk Assessment states that the proposed development has positively embraced the sequential method in terms of site layout planning by placing the proposed building clusters in Plots 1-3 which is located in Flood Zone 1

and placing the public recreational land and outdoor flexible backlot in an historic Flood Zone 2. The building clusters in Plot 1-3 and the Culture and Skills Academy in Plot 4 are classified as “less vulnerable”, with the public recreational land in Plot 4 and the outdoor flexible backlot in Plot 5 are classified as “water compatible development”. The proposed uses within Flood Zone 2, Plots 4 & 5 are classified as Less Vulnerable, with the public recreational land classed as Water Compatible, and therefore the exceptions test is not required.

Flood risk mitigation and drainage

18.18 The majority of the proposed buildings are located in Flood Zone 1 and the existing risk from fluvial and tidal flooding is considered to be low. Safe access and egress routes are to be provided above predicted 1 in 100-year (+35% CC) flood levels, for areas of the proposed development located in Flood Zone 2. It is stated that the proposed bridge across the Westhorpe watercourse is not considered to lead to an increase in flood risk and that a flood evacuation plan will be developed post planning consent to discharge any associated planning conditions.

18.19 Flood risk from existing groundwater is assessed as low. It is stated that to further mitigate the residual risk, the proposed Development will ensure that where possible overland flow paths are directed away from the proposed buildings, a surface water drainage system with attenuation will be provided to intercept and control potential groundwater flooding above surface level and direct this to a receiving watercourse.

18.20 The flood risk from surface water (pluvial) has been assessed as low. The flood risk from reservoirs has been assessed as very low. The flood risk from surface water and foul water sewers has been assessed as medium. To mitigate this risk, no surface water is to be discharged to an adopted sewer. Thames Water has advised that their network currently has insufficient capacity to accept foul effluent from the proposed Development however, modelling work is being undertaken by the company to identify the location and nature of any improvement works that may be required.

SUDs and Drainage

18.21 The submitted Surface Water Drainage Strategy states that where practicable, Sustainable Drainage Systems (SuDS) will be used throughout the proposed Development to control the surface water discharge rate and volume, provide pollution mitigation, amenity and biodiversity uplift. Approximately 15,000m³ of attenuation will be provided in swales, ponds, buried geocellular crates, blue roofs and bioretention features. Predominantly these will consist of rain gardens, SuDS trees, swales, and ponds to treat surface water runoff as it flows through the proposed Development. It is concluded that the SWDS will provide sufficient pollution mitigation given the proposed land uses. A management and maintenance plan for the SuDS features and proprietary water treatment products has been provided in the SWDS. And adherence to the

maintenance strategy is essential to ensure the proposed drainage functions correctly throughout its design life. The LLFA has advised that they have no objection to the proposed development subject to planning conditions on any planning approval.

Utilities

- 18.22 The statutory sewerage undertaker for the Site is Thames Water. A DN375mm Thames Water foul water sewer flows in an easterly direction below the A4155 Marlow Road before crossing under the A4155 to the east of Westhorpe Farm Lane. It then flows in a southerly direction below Westhorpe Farm Lane before turning east to discharge into the Thames Water Little Marlow Treatment Works located to the east of the Site off Muschalik road. Another foul water sewer conveys foul water from both ends of the Westhorpe Farm Lane until the Thames Water manhole 861A in the south of the Wycombe District Athletics Track, where it flows from northwest to southeast direction also likely to discharge to the Thames Water Little Marlow Treatment Works. The ES concludes that the development results in insignificant effect on public sewerage network.
- 18.23 The mains water provider for the Site is Thames Water. The Thames Water asset records show a potable water network along Marlow Road. The ES concludes that the development results in insignificant effect on potable water network.
- 18.24 Thames Water advise it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. As such it recommends a grampian style condition requiring all foul water upgrades required to accommodate the additional flows from the development are completed or a development and infrastructure phasing plan approved to allow the development to be occupied connection into the public sewage system so that TW can appropriately plan and allocate infrastructure.

Conclusion

- 18.25 It is considered that the sequential test is passed and that the exceptions test is not required. The ES concludes that for the complete and operational Development, the embedded design of the scheme which includes Sustainable Drainage Systems (SuDS) and the Surface Water Drainage Strategy for the Development, the residual effects on the flood risk and drainage receptors are negligible and insignificant. Overall it is considered that the assessment has demonstrated that the proposed development is in accordance with local and NPPF policies, meets the requirements of the LLFA subject to conditions and is therefore considered acceptable in terms of flood risk and drainage whilst also considering climate change.

19 Ground Conditions, Minerals Safeguarding

Buckinghamshire Minerals and Waste Local Plan (July 2019):

Policy 1: Safeguarding Mineral Resources

Policy 26: Safeguarding of Minerals Development and Waste Management Infrastructure

- 19.1 Policy 1 of the Minerals and Waste Plan - Safeguarding Mineral Resources, states that proposals for development within Mineral Safeguarding Areas (MSAs) other than which constitutes exempt development, must demonstrate that:
- prior extraction of the mineral resource is practicable and environmentally feasible and does not harm the viability of the proposed development; or
 - the mineral concerned is not of any value or potential value; or
 - the proposed development is of a temporary nature and can be completed with the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
 - there is an overriding need for the development.
- The policy also requires the submission of a Mineral Assessment.
- 19.2 Policy 26 - Safeguarding of Minerals Development and Waste Management Infrastructure, safeguards mineral extraction sites with extant permission from other forms of development. Proposals for other forms of development within a site safeguarded for minerals development will be permitted where it can be demonstrated that:
- (for mineral extraction) the site is no longer required to support the delivery of the adopted provision rate and/or to maintain landbanks (with reference to the prevailing Local Aggregates Assessment); or
 - an alternative site could be provided that would be as appropriate for the use as the safeguarded location without significant interruption to operations and (for waste management) can service the existing catchment area; or
 - there is no longer a need for the facility in either the vicinity or the wider area as appropriate.
- 19.3 NPPF paragraph 183 advises that planning decisions should ensure that “*a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination*”. Paragraph 184 of the NPPF advises that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.
- 19.4 NPPF paragraph 209 states that since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Paragraph 212 states that Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.

Minerals Safeguarding

19.5 The application site partly coincides with a minerals safeguarding area (MSA) as it falls within land benefitting from a Review of Old Minerals Permissions (ROMP) consent Ref: W/97/6908 which updated permission and conditions of an earlier consent WR/2784/61. The extent of the ROMP can be seen below and in Appendix G. A Minerals Assessment has been submitted along with a subsequent Addendum to the Minerals Assessment. The assessment identifies where mineral resource may potentially still be present. The quantum of mineral identified within Plots 3, 4 and 5 is approximately 350,000 tonnes. The assessment concludes that technically, it may be possible to extract some of the mineral resource. It states *However, from the available evidence Waterman has been unable to conclude that the extraction could be performed in such a manner as to be environmentally feasible. The activity would likely pose additional risks to controlled waters. It would likely generate a significant number of additional vehicle movements. Including, incurring associated impacts on air quality and the noise environment.* It reports that prior extraction of the mineral resource would not be a commercially viable and would harm the viability of the proposed development.



19.6 It should be noted that the ROMP covers a wider area of land than that owned by the applicant. It is also noted that Plot 3 north was not included in the Ground Investigation, due to this land currently being in use, but an estimate of mineral available has been made.

19.7 The addendum Minerals Assessment provides further information (sought by the council) regarding costs of mineral extraction and how viability has been assessed and been found to be too negatively impacted by mineral extraction and infill to undertake prior extraction. It concludes that prior extraction of the mineral resource with restoration by inert landfilling would result in a net loss of £37m which the Applicant considers, harms the viability of the proposed development.

19.8 Policy 1 safeguards areas which may have mineral underlying them from development which would sterilise it. The applicant's Assessments conclude that whilst technically possible to extract some of the minerals resource underlying Plot 3 and to restore the land by inert landfilling, the extraction could not be performed in such a manner as to be environmentally feasible. This is because the activity would likely pose additional risks to controlled waters, it would generate a

significant number of additional vehicle movements as set out in the addendum to the Environmental Statement, subsequently incurring associated impacts on air quality and the noise environment. As prior extraction of the mineral resource with restoration by inert landfilling would also result in a net loss of £37m, it is demonstrated that extraction is not viable therefor *the mineral concerned is not of any value or potential value* meeting the requirements of the policy. It is also the applicant's case that *there is an overriding need for the development*. Meeting a need is presented as part of the very special circumstances case and is considered under 'Weighting & balancing' and not addressed here in consideration of Policy 1.

19.9 Policy 26 safeguards minerals and waste development with planning permission. The loss of the ROMP comprises what is estimated to be a very small resource underlying the site. There would also be a loss of void capacity (the lake) for waste management however while theoretically it could accept waste, the site has been shut for the best part of 20 years indicating that there is no need for it. It is noted that the site is not included in mineral reserve landbank calculations, nor in waste management landbank figures.

19.10 Regarding land outside of the red line application site, but within the ROMP (land benefitting from planning consent for the extraction of minerals), the developer's Addendum Minerals Assessment accept that "it would be impractical for others within the boundary of the extant permission to work the mineral in isolation." No assessment has been made of the amount of (off-site) minerals workings that would be sterilised as a result of the proposal, however, the remaining land is significantly smaller than that within the site redline boundary and therefore considered reasonable to conclude that it is unlikely that this would be viable.

19.11 As a worst-case assumption, the effect of the development would be to sterilise all the minerals under the ROMP Consent. It is considered that the site is no longer required for mineral extraction and that there is no longer a need for the site as a waste facility and therefore the proposals are considered in compliance with the policy. Even if the land outside the site but within the ROMP was not sterilised, the conclusion would be same.

Ground Conditions

19.12 The Environmental Statement Chapter 12 – Ground Conditions and Excavation Waste, reports that soil and water samples indicated the presence of pollutants. The ground investigation identified contaminants as attenuating within a short distance on-site and therefore not posing a significant risk to groundwater and surface water bodies. Ground gas monitoring and assessment of organic matter contents of the made ground recorded a potentially significant ground gas regime, in which ground gas protection measures are required in built structures on-site. During demolition and construction works, the risks could be managed through the implementation of a Construction Environmental Management Plan (CEMP), adherence to the mitigation and remedial measures (if required by the

ground investigation) and use of appropriate design for the ground conditions. For the completed Development the provision of clean topsoil/subsoil, incorporation of gas protection measures within buildings, appropriate design of buried structures and services would appropriately manage these risk. It is concluded that upon completion of the Development, any residual effects from ground contamination would be negligible as long as suitable mitigation measures are undertaken. The Environmental Health Officer are satisfied that the investigations that have been undertaken to date are sufficient and that the proposed remediation strategy is considered to be acceptable.

- 19.13 A Site Waste Management Plan (SWMP) to be further developed and implemented to minimise, manage and monitor the generation of waste to be taken off-site fate, would be secured as part of a consent. It is concluded that any residual effects on off-site landfills from site derived excavation waste would be negligible providing the mitigation measures are undertaken. The development is considered to be policy compliant in respect to land contamination.

20 Other Environmental Matters

Wycombe District Local Plan (August 2019)

CP7 (Delivering the infrastructure to support growth) DSA:
DM19 (Infrastructure and delivery)

- 20.1 Policy CP7 states that provision will be made for new infrastructure to support growth, through planning obligations, the Community Infrastructure Levy (CIL) and other available funding streams as appropriate. Where justified, development will be required to provide or contribute towards delivering the key infrastructure requirements for the District.
- 20.2 DSA Policy DM19 states that where development will create a need to provide additional or improved infrastructure, amenities or facilities, developers will be expected to make provision directly including through planning obligations and / or through financial contributions to the Wycombe Community Infrastructure Levy.

Agricultural Land

- 20.3 The NPPF, at paragraph 174 b) notes the benefits of protecting the best and most versatile agricultural land (BMV). The footnote to paragraph 171 also states “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”. The glossary of the Framework gives the following definition. “Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.” In assessing the effects of the development on agricultural land it is necessary to have given consideration to the Agricultural Land

Classification (ALC), devised by Ministry of Agriculture Fisheries and Food (1988). This is the standard method used for determining the quality of agricultural land.

20.4 While this topic was scoped out of the ES, an Agricultural Land Assessment in support of the application (Document 21) has been submitted and concludes that given the current state and condition of the land and its previous use as a landfill site, that the land is entirely unsuitable for any agricultural use. With particular regard to the potential for using the land for grazing for livestock or other animal production the report concludes that the nature of the land presents a serious risk to animal health by way of either direct injury from, or ingestion of, foreign material in the soil. Also, they cannot rule out contamination to the produce making it unfit for human consumption. The report concludes that the site would be unsuitable for forestry or carbon capture through tree planting due to the shallow nature of the soil. It is concluded that given that the land is unsuitable for agriculture and forestry, no agricultural or forestry harm arises as a consequence of the reuse of the land.

Waste

20.5 The ES Chapter 12 addresses excavation waste and is based on a desk-based assessment of landfill capacity in Buckinghamshire and beyond, the nature and extent of historically landfilled waste at the site established by the findings of the preliminary risk assessment and contaminated land interpretive report, as well as the proposed earthworks to create the platform for the development.

20.6 It is stated that the potential quantity of historically landfilled waste that could require disposal has been minimised by the earthworks strategy. Should removal from site be required for disposal to landfill, there is predicted to be sufficient non-hazardous waste capacity available in Buckinghamshire. Hazardous waste landfill would require disposal to landfills further afield, with capacity predicted to be available within around 100 miles of the site. The ES concludes that any residual effects on off-site landfills from site derived excavation waste would be negligible providing the mitigation measures are undertaken. A Site Waste Management Plan (SWMP) will be further developed and implemented to minimise, manage and monitor the generation of waste. This could be secured by condition.

20.7 The Development would follow the waste hierarchy of reduce, recycle, recovery and disposal, with appropriate waste storage and segregation facilities provided. This process is described in the Operational Waste Management Strategy (OWMS) submitted as part of the planning application. The flexible OWMS provides a strategy of internal and external waste storage areas comprising the use of bins, skips and mechanical aids such as pallet trucks / forklift trucks, to meet the needs of future users such as tenants, site staff, and refuse collection operatives. The strategy provides waste management considerations during production, pre-production/post-production, public spaces and backlot. The

operational waste management strategy and appropriate arrangements can be secured by condition.

Matters relating to the Environmental Impact Assessment

- 20.8 The submitted Environmental Statement has been considered on a topic by topic basis throughout this report. Consideration of Alternatives, Cumulative Effects and the summary of Mitigation Measures are addressed here.
- 20.9 *Consideration of Alternatives:* The EIA Regulations state that an ES should include 'a description of the 'reasonable alternatives' (for example in terms of development design, technology, location, size and scale) considered by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'. It is noted that planning policy guidance states that the EIA Regulations do not require the consideration of alternatives, rather, that where alternatives have been studied the ES should report these to demonstrate how the scheme evolved.
- 20.10 The applicant has considered a 'Do Nothing' (also referred to as a 'No Development' scenario) for two options. The first, in the context of the adopted Wycombe District Local Plan (WDLP) planning policy RUR4 in relation to the Country Park site allocation being implemented, and the second to consider if the remaining extant permission for sand and gravel extraction and landfill is implemented. It is noted that a Sequential Test/alternative site analysis has been undertaken to support the planning application as a standalone document, separate from the ES.
- 20.11 It is stated that the RUR4 policy is allocating the land for recreational uses in support of the provision of the Park, but the Park itself is provided for under the 1968 Countryside Act not under the Planning Acts. It is noted that in February 2020, the Council bought Spade Oak Lake, and the Council is also the sole trustee of land held by the Thameside Preservation Trust that lies between Spade Oak Lake and the River Thames, together these total 55ha. The remaining 83% of the area is in multiple private ownerships. It is stated that:
As the Country Park is currently undeliverable, and there is no viable mechanism identified to implement it, the aims and objectives of policy RUR4 would not be met, and a Country Park could not be provided. The reasonable 'Do Nothing' scenario is therefore that the Site continues in its current use.
- 20.12 Should the development not proceed, the extant permission for sand and gravel extraction and landfill could be further exploited. There is some limited mineral likely to remain and Westhorpe Lake could be subject to infilling as an inert landfill (subject to securing the necessary consents). However, it is noted the permission has been in place for many years and therefore it is not certain that further mineral extraction and / or infilling would ever occur.

- 20.13 It is noted that a Sequential Test/alternative site analysis has been undertaken to support the planning application as a standalone document, separate from the ES. This report provides commentary on social, economic and high-level environmental reasons for the choice of the site.
- 20.14 The design evolution of the scheme is described in reference to the Design and Access Statement (DAS). It is stated that as the design of the building layouts and road structure within the development plots developed, a number of environmental criteria were determined to assess the variety of options. These criteria included potential effects on ecology, trees, ground conditions, long views, the acoustic environment (specifically neighbours from Westhorpe Park Homes), access to and from the site, the public footpath crossing the site. Technical environmental assessments were then undertaken to inform the design. Four design iterations between June 2021 and May 2022 are summarised, where were incorporated in consideration of environmental effects.
- 20.15 *Cumulative effects Assessment:* Two types of cumulative effects have been assessed. Type 1 Effects: The interaction of the individual effects upon a set of defined resources or sensitive receptors: for example, from noise, traffic and visual intrusion. A number of significant impact interactions were identified associated with construction over its duration, where noise, vibration and visual intrusion impact Westhorpe House and Westhorpe Park Homes. Longer-term significant impacts interactions arise from the operation of the studios due to adverse effect from studio and backlot noise, adverse effects the historic environment and adverse visual effects.
- 20.16 Type 2 Effects: The combined effects arising from the Development in combination with other existing and / or approved schemes. Three schemes were considered for the in-combination effects: Cressex Island (21/05938/FUL), Handy Cross (21/07051/FUL), Handy Cross (21/06261/R4OUT). No Type 2 significant cumulative effects were identified.
- 20.17 *Mitigation Measures:* The ES Chapter 17: Next Steps provides a summary of likely mitigation, monitoring and enhancement measures identified in Chapters 7 to 16 and ES Volume 3: LVIA. The mitigation measures are summarised in Tables 17.1 and 17.2 (refer to appendix H) noting that this does not include any updates from the September submission.

21 Infrastructure and Developer Contributions

Wycombe District Local Plan (August 2019):

POLICY CP7- Delivering the infrastructure to support growth

Wycombe District Delivery and Site Allocations Plan (2013):

POLICY DM19- Infrastructure and delivery

21.1 Policy CP7 states that provision will be made for new infrastructure to support growth, through planning obligations, the Community Infrastructure Levy (CIL) and other available funding streams as appropriate. Where justified, development will be required to provide or contribute towards delivering the key infrastructure requirements for the District.

21.2 DSA Policy DM19 states that where development will create a need to provide additional or improved infrastructure, amenities or facilities, developers will be expected to make provision directly including through planning obligations and / or through financial contributions to the Wycombe Community Infrastructure Levy.

21.3 Having regard to the relevant guidance and statutory tests for planning obligations in the Community Infrastructure Levy regulations and the National Planning Policy Framework, it is considered that the measures set out below would be required to be secured within a section 106 agreement in order for the proposed development to be acceptable.

Travel Plan Provisions

21.4 Measures to secure and implement travel plans for both the Film Production Facilities and Skills & Cultural Academy and to include provisions to: appoint a Travel Plan Co-Ordinator; undertake yearly monitoring and reporting for a period of 5 years and if Travel Plan targets are not met, to implement remedial measures and continue monitoring for a future 5 years; and, to appoint a traffic expert if there is a dispute or disagreement.

Bus provision

21.5 To create two public bus routes (High Wycombe station to Maidenhead station and Marlow to Bourne End) and provide and operate a Shuttle Bus Service for so long as the Development continues to be occupied.

Mode Share Incentive Scheme (MSIS)

21.6 A scheme as a means to encourage sustainable travel and that no more than 60% of Visitors to the Development (per driver) arrive by car. If the target is not met to pay to the Council a specified sum to promote sustainable transport related to the traffic routes impacted by the Development or within the vicinity of the Site.

Footpath and Cycleway Links

- 21.7 The provision of new paths and cycleways within the site and in the vicinity – refer to summary at 14.21 of this report.

Sustainable Transport Contribution

- 21.8 Pay a sustainable transport contribution to promote the use of sustainable transport by Visitors to the Development and to include the provision of sustainable transport measures.

Country Park Provision

- 21.9 To secure land and implement a programme of works and a regime for the long term management and stewardship of the an area of land close to Little Marlow to meet the requirements of Policy RUR4 of the Local Plan.

Minerals Provision (ROMP)

- 21.10 No further landfill, mineral extraction and operations works will be carried out pursuant to the ROMP except for monitoring, mitigation and remediation works that may be required.

Local Economic Benefits Provisions

- 21.11 To work in partnership with the Council and Bucks Skills Hub to deliver an industry standard construction apprenticeship scheme for Local People to be operated through the building contracts throughout the construction of the Development. To include:
- to procure early pre-recruitment engagement with local people to ensure that they are given the opportunity to learn new skills, are notified of potential vacancies and given the opportunity to train and apply for jobs in the construction of the development
 - to provide an apprenticeship/training programme providing at least 60 new training places per year, at a total cost of £1,040,000 (£104,000 per annum) for a period of 10 years and to use reasonable endeavours to ensure that 20 of the trainees per year are Local People and no less than 40% of the trainees are selected from culturally, ethnically or racially/inclusivity candidate groups
 - provide the Bursary in the sum of £525,000 (£105,000 per annum) for a period of 5 years, to support new employees within the Development in progression of their careers in the film industry;
 - encourage prospective tenants to adopt a proactive locally focused employment and skills strategy that is in keeping with the commitment to ensure that training and mentoring packages apprenticeships and work placement opportunities are offered to local people

- secure work with the Bucks Skills Hub and local schools to deliver a range of educational activities including (but not limited to) site visits, careers activities and curriculum based workshops;
- secure work in partnership with the Council the Buckinghamshire Skills Hub Jobcentre Plus and other relevant agencies to provide work placement opportunities for local people within the Film Production Facilities;
- appoint at their expense a part time scheme co-ordinator to oversee the implementation and operation of the said schemes
- the Skills and Cultural Academy is constructed and open for use
- the Incubator Hub is designed to accommodate start-up businesses and to prioritise opportunities for Local Businesses to utilise the Incubator Hub.

Public Use Provisions

21.12 To agree a programme for the delivery of the Skills & Cultural Academy and Community Hall and management, maintenance and booking arrangements to utilise these facilities.

21.13 Provision and management of weekend 60 chargeable car parking spaces for the general public.

21.14 To ensure mechanisms for review and realignment of the approved programme to facilitate enhanced education, community, cultural, private hire of the Skills & Cultural Academy, Community Hall and the Recreational Land and the further utilisation of the Incubator Hub; and to establish and maintain a publicly available website in the provision of:

- a Local Screen supplier directory;
- a community engagement and liaison platform;
- pastoral support to local residents; and
- priority tickets to a cultural and screening programme.

Café Facilities

21.15 To secure Café Facilities open to the general public within normal and reasonable trading practice and to continue to provide such access for the duration of the operation of the said Café Facilities.

Public Art

21.16 To secure the provision of an approved Public Art Scheme.

SUDS

21.17 To implement a sustainable urban drainage systems scheme for the Development.

Biodiversity Net Gain Provisions

- 21.18 Provision of a Biodiversity Offsetting Scheme to include:
- an Agreed Receptor Site or Agreed Receptor Sites
 - a Biodiversity Net Gain Management and Monitoring Plan
 - contractual terms or equivalent to secure the delivery of the Biodiversity Offsetting Scheme.

Management Company

- 21.19 To set up a Management Company for the purposes of managing and maintaining for the lifetime of the Development:
- the Footpath and Cycleway On-Site Links and Off-Site Links
 - the Community Hall
 - the Incubator Hub
 - the Biodiversity Offsetting Scheme
 - SUDS.

Contributions

- 21.20 Financial contributions required for monitoring the implementation of the provision of the planning agreement, sums to be agreed.

Unilateral Undertaking

- 21.21 The applicant has provided a Unilateral Undertaking to secure further planning obligations which are not material to the grant of Planning Permission and not necessary, directly related or fairly and reasonably related to the Development for the purposes of Regulation 122 of the Community Infrastructure Levy Regulations 2010. The measures included are summarised below.

Public uses provisions

- 21.22 To establish and maintain a publicly available website in the provision of priority tickets to a cultural and screening programme to the Park Homes Residents on a reasonable concessionary basis.
- 21.23 To offer to the Park Homes Residents the provision of enhanced security for the Park Homes Residents in the installation of a new secure entrance barrier.
- 21.24 To offer to the Park Homes Residents the provision of one (1) free bus pass for no longer than a 12 month period to each residential property within the Park Homes development.

Charging Point Contribution

21.25 A financial contribution to secure new vehicular charging points (to include air quality monitoring and Wi-Fi enabling functionality) within the vicinity of Marlow.

Additional Mitigation Measures

21.26 The introduction of physical works or measures within the Little Marlow Land in the provision of Biodiversity Offsetting Off-Setting Measures and/or in the delivery of a wider Suitable Alternative Natural Greenspace (SANG) e.g. the establishment of a dedicated pedestrian [and cycling] route and associated landscaping and enhancement measures.

22 Weighing and balancing

22.1 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.

Statutory duties

22.2 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

22.3 In addition, Section 143 of the Localism Act amended Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- Provision of the development plan insofar as they are material,
- Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
- Any other material considerations

22.4 The Planning (Listed Building and Conservation Areas) Act 1990 considerations are as follows:

- Section 66 of the Planning (Listed Buildings Conservation Areas) Act 1990 places a duty on the LPA to have special regard to the desirability of preserving listed building or their settings or any features of special architectural or historic interest which it possesses.
- Section 72 requires that special attention is given to the desirability of preserving the character and appearance of Conservation Areas.

22.5 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which for decision taking means approving development proposals that accord with an up-to-date development plan without delay; or where there

are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date [footnote 8], granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed [footnote7]; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

22.6 Paragraph 12 of the NPPF states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. *Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.*

22.7 In considering paragraph 11 of the NPPF, there are relevant development plan policies that apply to this application. The Wycombe District Local Plan 2019 is recent and overall, the suite of development plan policies is considered to be up-to-date. The policies which are most important for determining this application are Local Plan policy CP1 Sustainable Development, CP2 Overall Spatial Strategy, CP8 Protecting The Green Belt, CP9 Sense of Place, CP10 Green Infrastructure And The Natural Environment, CP11 Historic Environment, RUR4 Little Marlow Lakes Country Park, CP13 – Climate Change, DM30 The Chilterns Area Of Outstanding Natural Beauty, DM31 Development Affecting The Historic Environment, DM32 Landscape Character And Settlement Patterns, DM42 Managing Development In The Green Belt; and, Delivery & Site Allocations Plan policies DM2 Transport Requirements Of Development Sites.

22.8 The NPPF requirement in respect of Green Belt harm is to carry out a balancing exercise in considering whether very special circumstances exist, if the harm to the Green Belt and the other identified harms are clearly outweighed then planning permission may be granted. In those circumstances there would be no conflict with policy DM42 and the strength of the case in favour of the development would be likely to outweigh any other conflict with the development plan, subject to their being compliance with the Habitats Regulations 2017.

Green Belt and other harm

22.9 Green Belt: The proposed development would constitute inappropriate development which by definition is harmful to the Green Belt (as acknowledged by the applicant) and would result in very significant spatial and visual harm to the openness of the Green Belt. The proposals would result in significant loss of open countryside and be in conflict with the fundamental purpose of the Green Belt policy, 'to prevent urban sprawl by keeping land permanently open'. In addition, the proposals would lead to a conflict with four of the five Purposes of including

land in the Green Belt resulting in significant harm to purposes a), b), and c) and definitional harm to purpose e). The proposals would result in sprawl beyond Marlow's well-defined boundary and encroachment into the open countryside. The scale and extent of development will diminish the open countryside character and the green gap between Marlow and Little Marlow. The proposal would be contrary to local development plan policies CP1, CP2, CP8 and RUR4. This harm is afforded very substantial negative weight.

22.10 RUR4 Marlow Country Park: The development would enable some of the aims of policy RUR4 to be delivered, namely it would provide some publicly accessible open space and biodiversity enhancement, however it would fail to deliver on the main purpose of the policy which seeks to limit development to those uses associated with outdoor sport and recreation, which preserves the openness of the Green Belt, and that furthers the purposes of the Country Park. The proposals would result in the loss of c36ha (c10%) of the Country Park policy area and the development would have an adverse effect upon the amenities and natural setting of watercourses, lakes, wet woodlands, and adjoining listed buildings. The development results in significant harm and is in conflict with policies RUR4, CP1, CP2 and the Little Marlow Gravel Pits SPG. Significant weight is attributed to this identified harm.

22.11 Landscape character, visual effects and AONB setting: The existing openness of the site is an essential feature of the landscape, providing continuity of views and a sympathetic transition of character from the Chilterns AONB into the Thames Valley landscape, which also reinforces the essential openness of its function as Green Belt. Where the existing urban area of Marlow is tightly contained by the A404, the proposed development will break away from this and extend significantly eastward into the neighbouring countryside. This intrudes upon and obscures views between the Thames Valley and Chilterns AONB and breaks the continuity of the open rural landscape between them. The proposals result in significant adverse impacts upon landscape character and visual amenity. The proposals will cause significant harm to the landscape character and visual amenity of the setting of the Chilterns AONB. The adverse effects would be significant and long term. The proposals are considered to conflict with the Local Plan policies CP9, CP10, RUR4, DM30, DM32.

22.12 The scheme will be a very large, dense and imposing development in a sensitive landscape location. Mitigation measures have been incorporated into the design but fundamentally because of its scale and extent the proposed development will not be successfully integrated into the landscape and urbanising features will change the fundamental character of countryside amenity that is currently enjoyed by members of the public, and which remains a key objective for public recreational use in this location. The scale and form of design is considered visually intrusive and on the whole not appropriate in character in relation to its context. The proposals are considered to be in conflict with local policies CP9, DM35 and RUR4. Overall the harm identified would be significant attracting significant negative weight.

- 22.13 Residential amenity: The development would have an impact on the amenities of several residential dwellings – Westhorpe House, Westhorpe Park, Westhorpe Cottage, Westhorpe Farms and Stallworthy. The impacts would include harm by reason of impacted outlook, noise (during the daytime and night time on the backlot or when events are held), and disturbance through traffic noise and increased traffic on access roads. Whilst some impacts can be mitigated through design and conditions, there would remain some residual adverse amenity effects on neighbouring residents contrary to Local Plan Policies CP9 and DM35. This amounts to moderate harm to which moderate negative weight is attributed.
- 22.14 Heritage: The scale, height amount and dispersion of the development would not preserve the settings of the designated heritage assets. The impact of the proposals on the significance of the setting of Westhorpe House a Grade II listed building would be Less than Substantial at the high end of the spectrum; for Corners Cottage a Grade II listed building and Little Marlow Conservation Area, the harm would be less than substantial at a medium/moderate and lower/minor end of the spectrum. This is to be weighed against the public benefit arising from the development in accordance with policy DM31 and NPPF 202 and any harm is given great weight in accordance with the NPPF paragraph 199. This is undertaken later in the report.
- 22.15 Highways: It is evident that there are issues relating to the internal layout, the Sustainable Travel Strategy, sustainable transport connectivity and traffic impact that remain unresolved and outstanding. Proposed pedestrian and cycling connections are considered to be inadequate and mode share targets are considered overly ambitious. The scale of traffic impacts on local junctions and the highway network is such that officers cannot conclude that the development is acceptable, well connected with safe and suitable access and would not lead to severe and unacceptable impacts on road safety and network operation. Therefore the proposals represent unsustainable development and are contrary to local plan policy CP13 and DM33 and the National Planning Policy Framework. This amounts to significant harm to which significant negative weight is attributed.
- 22.16 Ecology: The scale of development is such that it would result in ecological impacts. Overall it is considered that it would be possible to minimise, mitigate and compensate for impacts on protected, priority and notable species and habitats and deliver a net gain in biodiversity off-site. This is neutral in the planning balance.
- 22.17 Because of potential impact including visual impact and noise affecting the identified Spade Oak SANG provision, significant impacts through recreational pressure on Burnham Beeches SAC cannot be ruled out. The proposals are therefore contrary to paragraphs 190-181 of the NPPF and the Habitats Regulations 2017. This results in considerable harm which is afforded significant weight in the planning balance.

Benefits – the applicant’s case for Very special circumstances

22.18 The applicants’ very special circumstances are considerations that weigh in the planning balance. The very special circumstances put forward by the applicant are:

1. Socio-Economic Benefits
2. Meeting the need for film and television facilities.
3. Meeting local and national government policy.
4. The requirement to co-locate with other comparative facilities within the West London Cluster

22.19 Dealing with 1. Socio- Economic benefits, the Marlow Film Studios proposal represents a significant investment in one of Buckinghamshire’s key economic sectors and supports the delivery of the aims and ambitions of national and local economic strategies. The proposals would create significant employment and skills and training opportunities and would also support local businesses, the tourism sector and an increase in GVA. A number of local economic benefits would be secured by S106 Planning Obligations.

22.20 It is considered that benefits 2, 3 and 4 are aspects of the same benefit and are considered and weighted together.

22.21 Whilst there is inevitably uncertainty in the forecasts of need for studio space, there is a consensus that the pipeline of studio space coming forward would as a minimum meet demand up to 2029. The proposed development would provide a large, purpose built facility and would support the expansion of the successful West London cluster and promote skills development, in line with Government industrial strategy. The provision of purpose-built studios of this scale, could be considered a significant economic opportunity given the scale of ambition the Government is now advancing in respect of the TV / Film sector.

22.22 Co-location with other comparative facilities within the West London Cluster, can be considered a beneficial factor given the Government’s support for investment in clusters. However, given the significant pipeline of studio space within the cluster, and the fact that there are many successful studios outside the cluster, co-location is not accepted as an essential requirement.

22.23 The proposed Skills and Workforce Development Plan which would be secured as part of a consent, would help address skills shortages and recruitment challenges in the construction and creative sectors.

22.24 Overall it is considered that the contribution that the proposals could make to the film and television industry having regard to the lack of certainty outlined above is significant and this benefit is afforded significant weight in the planning balance.

Other benefits

- 22.25 BNG: The proposed development would provide biodiversity enhancement off site and secure a 20% increase in biodiversity value, compared with baseline application site assessments. The BNG is compensating for loss of biodiversity on site, and while 20% net gain is significant the offsite land subject to RUR4 has the potential to contribute to BNG without the improvements to be secured through the development. It is considered that nonetheless the 20% BNG benefit can be afforded significant weight in the planning balance.
- 22.26 Country Park provisions and public access: A Country Park Scheme is to be secured by S106 Planning Obligations to include a programme of works and a regime for the long term management and stewardship of land secured within the RUR4 policy area, to the north of Spade Oak Lake. This land is primarily to provide for off-site biodiversity net gain (BNG), and would also provide a walk/cycle route on the northern part of the land, which would complete an alternative traffic-free cycle connection between Marlow and Bourne End. The land would be publicly accessible (subject to BNG requirements).
- 22.27 The applicant's case is that Marlow Film Studios would also contribute to the Country Park in the following ways:
- provision of public access to an area for quiet recreation at Plot 4
 - connectivity improvements between Marlow and towards Spade Oak (i.e. provision of walk and cycle connections)
 - delivery of biodiversity gains on Plots 4 and 5
 - the preservation and enhancement of the existing green infrastructure corridors, securing wider connectivity benefits for ecology
 - provision of a mixed-use building on Plot 4 for cultural, educational, and recreational uses in connection with the film studio and wider public uses
 - provision of a Café on Plot 2A to facilitate public enjoyment of the area
 - delivery of parking on the site, to be made available outside of core working hours for the public in connection with the recreational use of the wider land; and,
 - Operation of a website to facilitate residents' engagement in events, concessionary offers and other opportunities to utilise the site in association with the use of the new Country Park
- 22.28 A number of the applicant's stated contributions to the Country Park are considered under other benefit headings (BNG, Public uses, Cycle and pedestrian paths) and double counting of benefit is to be avoided. The Country Park and public access provisions are beneficial but they principally provide mitigation for the loss of and impact on other land within the RUR4 policy area. Therefore moderate weight is afforded in the planning balance.
- 22.29 Public uses: The provision of the Skills & Cultural Academy, associated Recreational Land and Community Hall along with a programme for their management, maintenance and booking arrangements will enable these facilities

to be available for education, community use, private hire, and cultural events. This is a benefit that is afforded moderate weight in the planning balance.

22.30 Cycle and pedestrian path improvements: A scheme for the provision and improvement of pedestrian and cycle links within the site and off-site connecting Marlow, Little Marlow and towards Bourne End is to be secured as part of the consent. These connections are mitigation required as part of the sustainable access strategy for the development but will also provide benefit to general users. There are a number of factors that temper the weight to be afforded to this benefit. The enhancement of the existing PROWs that cross the site through improved surfacing and lighting, will have an urbanising effect on its existing character. The proposed new pedestrian and cycle route to the east of the site from Little Marlow to the western edge of Bourne End is to be provided across the field to the south of the A4155 Marlow Road, however there is no certainty on whether this proposal can be carried out or not. The proposed route into Marlow via the Westhorpe Interchange would be the only walking and cycling route that is aimed at catering for walking and cycling for both able bodied people and people with mobility impairments and the deliverability of necessary improvements to this route would need to be acceptable to National Highways and is uncertain. This benefit is afforded limited weight in the planning balance.

22.31 Public transport improvements – busses: The Public Transport Strategy advanced includes the provision of a new bus stop at the Entrance Square and obligations to secure a new public bus service between High Wycombe and Maidenhead (Min half-hourly frequency 06:00 and 19:00 Monday to Friday, frequencies and operating hours scalable according to demand); and a second new public ‘hopper’ bus service on A4155 Corridor between Marlow and Bourne End. These provisions are mitigation required as part of the sustainable access strategy for the development but will also provide public benefit. The weight to be afforded to this benefit is tempered as the Council’s Public Transport Section cannot confirm that they are satisfied with the public transport improvements being proposed. This benefit that is afforded limited weight in the planning balance.

22.32 The Benefits of New Film Studios on Local Heritage and Landscape: An Addendum Planning Statement entitled ‘The Benefits of New Film Studios on Local Heritage and Landscape’ has been submitted in support of the proposals. This highlights the economic benefit of the film industry on heritage assets in general. While this is of public benefit, no income is secured by the development and the film studios would contribute nothing directly to the identified heritage assets. Indeed, far from enhancing their presentation, their settings would be permanently and profoundly altered by the amount, scale and appearance of the development. The benefit is considered to be very limited to which great weight is given.

Balance relating to Heritage

22.33 In considering paragraphs 202 of the NPPF in relation to the harm to heritage assets, it is concluded that the harm arising from the impact on the setting of the heritage assets is considered to be 'less than substantial harm' with a range of magnitude (high for Westhorpe House, medium/moderate for Corners Cottage and low/minor for Little Marlow Conservation Area). As outlined in the report above, there would be public benefits of the scheme in relation to the economic, social, community and environmental aspects. The view of Officers is therefore that the potential public benefits of the scheme would outweigh the harm identified to the setting of the designated heritage assets.

Conclusion on balancing exercise

22.34 The Green Belt balance has set out all of the harms on one side and all of the benefits and other material considerations on the other side of the balance and officers have concluded that the Green Belt harm and other harms are not clearly outweighed by all of the benefits. The applicant has not demonstrated 'very special circumstances' to justify inappropriate development in the Green Belt for the purposes of paragraph 148 of the NPPF. The proposal would conflict with policies CP1, CP2, CP8, DM42 and RUR4 of the local plan.

22.35 It is considered that the Green Belt and landscape harms alone are cumulatively very substantial and it is clear that even if the applicant's need case and the absence of alternative sites was accepted in full, that the VSC balance would still come out adverse to the development. The clear conflict with Little Marlow Country Park policy RUR4 reinforces the conclusion on where the balance lies. It is not considered that any resolution of the highways' objection would change the conclusion on the balance.

22.36 It is considered that the Local Plan is up to date and application of the relevant policies demonstrates that the development proposal is in conflict with policies in respect of Green Belt, the site allocation, landscape, highways and biodiversity. It is concluded that the proposals are in conflict with the development plan as a whole. There are no other material considerations that would indicate a decision other than in accordance with the development plan.

22.37 The proposals represent unsustainable development and it is recommended that permission be refused for the reasons set out.

Equalities Act

22.38 In line with the Public Sector Equality Duty the LPA must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and Page 95 the relevant protected characteristics (age, disability, gender reassignment, pregnancy and

maternity, race, religion or belief, sex, and sexual orientation). The facilities proposed in this application are considered to be fully accessible for all visitors, regardless of any relevant protected characteristics as stated above and no discrimination or inequality would arise from the proposal.

Human Rights Act

22.39 The Human Rights Act 1998 Article 1 the protection of property and the peaceful enjoyment of possessions and Article 8 the right to respect for private and family life, have been taken into account in considering any impact of the development on residential amenity and the measures to avoid and mitigate impacts. It is not considered that the development would infringe these rights.

22.40 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest.

Working with the applicant / agent

22.41 In accordance with paragraph 38 of the Framework the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.

22.42 The Council worked with the applicants/agents in a positive and proactive manner by regularly updating applications/agents of any issues that arose in the consideration of their application and engaging in pre-application discussions.

23. [Recommendation](#): Refuse permission for the following reasons:

1. **Green Belt:** The proposed development would constitute inappropriate development and will result in spatial and visual harm to the openness of the Green Belt. In addition, the proposals will lead to a conflict with four out of the five purposes of including land in the Green Belt. The benefits of the scheme taken together do not clearly outweigh the Green Belt harm and other harm. 'Very special circumstances' have not been demonstrated to justify this inappropriate development in the Green Belt. The proposals are therefore contrary to the Wycombe District Local Plan (2019) policies CP1, CP2, CP8, DM42 and RUR4 and paragraphs 137, 138, 147, 148, 149 and 150 of the National Planning Policy Framework (2021).
2. **Country Park:** The proposed development is in conflict with and would fail to meet the overall purpose of Wycombe District Local Plan (2019) Policy RUR4 Little Marlow lakes Country Park which seeks to limit development to those uses associated with outdoor sport and recreation, which preserves the openness of the Green Belt, and that furthers the purposes of the Country Park. Furthermore it would result in the loss of a significant

area of land that would otherwise be valuable in enhancing the country park offer to the community and as a result of the scale and extent of development it would have an adverse effect upon the amenities and setting of the areas adjoining the site which prejudices the function of the area for the purposes of a Country Park. The proposals are therefore contrary to the Wycombe District Local Plan (2019) policies RUR4, CP1, CP2, and the Little Marlow Gravel Pits SPG.

3. **Landscape character, visual effects and AONB setting:** The proposed development intrudes upon and obscures views between the Thames Valley and Chilterns AONB and breaks the continuity of the open rural landscape between them, and results in significant adverse impacts upon landscape character, visual amenity and the setting of the Chilterns AONB. The associated landscape spaces and 'enhancements' to public rights of way results in urbanising features that change the fundamental character of countryside amenity that is currently enjoyed by members of the public, and which remains a key objective for public recreational use in this location. The proposals are therefore contrary to the Wycombe District Local Plan (2019) policies CP9, CP10, RUR4, DM30, DM32 and DM35 and paragraphs 130, 131 and 176 of the National Planning Policy Framework (2021).
4. **Highway impact:** Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would have a severe impact on the safety and flow of users of the existing distributor road network, and lead to additional on-street parking, contrary to the National Planning Policy Framework, Policy DM33 (Managing Carbon Emissions: Transport and Energy Generation) of the Wycombe District Local Plan (adopted August 2019), Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).
5. **Sustainable modes:** The proposed development fails to make adequate provision to allow accessibility to the site by non-car modes of travel. The development will therefore be heavily reliant on the use of the private car contrary to sustainable transport policies as set in the National Planning Policy Framework, Policy DM33 (Managing Carbon Emissions: Transport and Energy Generation) of the Wycombe District Local Plan (adopted August 2019), Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).
6. **Site Layout (highways):** The proposed layout would by virtue of its standard of design and layout give rise to a form of development which is therefore contrary to the National Planning Policy Framework, Policy DM33 (Managing Carbon Emissions: Transport and Energy Generation) of the Wycombe District Local Plan (adopted August 2019), Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).

7. **Residential Amenity:** The proposed development would have a detrimental impact on the amenities of residential occupiers nearby, by reason of impacted outlook, noise and disturbance through traffic noise and increased traffic on access roads. The proposals are therefore contrary to the Wycombe District Local Plan (2019) policies CP9 and DM35 and paragraphs 174 and 185 of the National Planning Policy Framework (2021).
8. **Burnham Beeches Special Area of Conservation (SAC):** The proposed development has the potential to adversely affect, including through visual impact and noise, the identified Spade Oak SANG provision thereby undermining the recreational pressure mitigation in place for Allocation BE2 (Hollands Farm) and resulting in significant impacts through recreational pressure on Burnham Beeches SAC. The development is therefore likely to have a significant effect upon the integrity of the SAC. The proposals are therefore contrary to the NPPF and the Habitats Regulations 2017.
9. Had the above reasons for refusal not applied, it would have been necessary for the applicant and the Local Planning Authority to enter into a satisfactory Section 106 Agreement to secure the provision of planning obligations, including:

- Travel Plan Provisions
- Bus provision
- Mode Share Incentive Scheme (MSIS)
- Footpath and Cycleway Links
- Sustainable Transport Contribution
- Country Park Provision
- Minerals Provision (ROMP)
- Local Economic Benefits Provisions
- Public Use Provisions
- Public Art
- SUDS
- Biodiversity Net Gain Provisions
- Management Company

and monitoring and financial contributions that are necessary to facilitate delivery of the proposed development and mitigate its impacts. In the absence of such provision the proposal is contrary to requirements of Wycombe District Local Plan (August 2019) policies RUR4, CP7, CP12, DM19, DM33, DM39, and Wycombe District Adopted Delivery And Site Allocations Plan (DAS) (2013) DM13, DM14, DM15 and Buckinghamshire Biodiversity Net Gain SPD (2022) and the National Planning Policy Framework.