



## Strategic Sites Committee agenda

Date: Thursday 16 December 2021

Time: 10.00 am

Venue: The Oculus, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF

### Membership:

P Bass, A Bond, N Brown, P Cooper, M Fayyaz, P Fealey, R Newcombe, J Ng, A Turner (Chairman), P Turner, J Waters (Vice-Chairman) and A Wheelhouse

Agenda Item	Page No
<b>1 Apologies for absence</b>	
<b>2 Minutes</b> To agree the minutes of the Strategic Sites Committee meeting held on 18 November and 25 November 2021.	<b>3 - 8</b>
<b>3 Declarations of interest</b>	
<b>4 19/00148/AOP - Land off Osier Way, East of Gawcott Road and South of Buckingham Ring Road, Buckingham, Buckinghamshire</b>	<b>9 - 76</b>
<b>Please note that item 5 will not be considered before 12.30 pm.</b>	
<b>5 PL/20/3280/OA - Land South of Pinewood Studios, Pinewood Road, Iver Heath, Buckinghamshire SLO ONH</b>	<b>77 - 466</b>
<b>6 Availability of members attending site visits (if required)</b>	

If you would like to attend a meeting, but need extra help to do so, for example because of a disability, please contact us as early as possible, so that we can try to put the right support in place.

For further information please contact: Sally Taylor on 01296 531024, email [democracy@buckinghamshire.gov.uk](mailto:democracy@buckinghamshire.gov.uk).

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## Strategic Sites Committee minutes

Minutes of the meeting of the Strategic Sites Committee held on Thursday 18 November 2021 in The Oculus, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF, commencing at 2.00 pm and concluding at 6.46 pm.

### Members present

P Bass, A Bond, N Brown, P Cooper, P Fealey, R Newcombe, A Turner (Chairman), J Waters (Vice-Chairman) and A Wheelhouse

### Agenda Item

**1 Apologies for absence**

Apologies had been received from Councillor Paul Turner and Councillor Jackson Ng.

**2 Minutes**

**Resolved:** The minutes of meeting held on 23 June 2021 were **agreed** as an accurate record and were signed by the Chairman.

**3 Declaration of interest**

Cllr Newcombe declared that he was a representative of Buckinghamshire Council on the Thames Valley Police and Crime Panel. Cllr Newcombe advised that he would be asking a question in relation to application 15/00314/AOP, paragraph 5.203, concerning Thames Valley Police.

**4 15/00314/AOP - Land South of The A421 West of Far Bletchley, North of the East West Rail Link and East of Whaddon Road, Newton Longville**

Proposal: Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

A site visit was carried out on 17 November 2021.

Speaking as local members for Milton Keynes Council, Councillor Allan Rankine and Councillor James Lancaster.

Speaking as a representative of Newton Longville Parish Council, Mike Galloway

Speaking as an objector, Councillor Ernie Thomas.

Speaking on behalf of the agent, Mr Gary Tucker – applicant.

Following a thorough debate, it was proposed by Councillor P Fealey and seconded by Councillor R Newcombe and agreed unanimously at a vote that the officer's recommendation be agreed.

**Resolved:** that permission be deferred and delegated to the Director of Planning and Environment for **APPROVAL** subject to the satisfactory completion of a legal agreement to secure: 1) financial contributions towards provision of education (primary and secondary); 2) on or off site sport and leisure provision; 3) off site farmland bird mitigation; 4) on-site provision of affordable housing, 5) financial contribution for hospital facilities; 6) provision of community facility; 7) onsite provision of primary school facilities and land for a secondary school; 8) provision of a health centre (GP surgery) (and/or financial contributions thereto); 9) provision and maintenance of public open space and recreation and play areas; 10) on-and off-site highways contributions/ works/road infrastructure works, travel plans, sustainable transport measures (and/or financial contributions thereto); 11) SUDS maintenance; and 12) phasing plan and subject to conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused.

Note: There was a 20 minute comfort break before the start of item 5.

**5 20/03539/APP - Installation of a gas tanker off-loading facility for injection of renewable gas into the national gas distribution network, SGN Gas Depot, Bletchley Road, Newton Longville, Buckinghamshire**

Proposal: Installation of a gas tanker off-loading facility for injection of renewable gas into the national gas distribution network

A site visit was carried out on 17 November 2021.

Speaking as local ward member, Councillor Iain Macpherson.

A statement was read out by the Democratic Services Officer on behalf of local ward members Councillor Jilly Jordan and Councillor Phillip Gomm.

Speaking as local member for Milton Keynes Council, Councillor Allan Rankine.

Speaking as a representative of Newton Longville Parish Council, Steve Heath.

Speaking as an objector, Councillor Ernie Thomas.

Speaking as the applicant and agent team, Harry Townshend.

Following a thorough debate, it was proposed by Cllr P Cooper and seconded by Cllr N Brown and agreed unanimously at a vote that the officer's recommendation be agreed subject to the following:

The Committee requested that the Council consulted with West Bletchley and Newton Longville Parish Councils on the routeing details before completing the s.106, to explore the possibility of alternating the routeing between those two areas.

**Resolved:** that the application be deferred for approval subject to the recommended conditions, the satisfactory completion of a legal agreement and the receipt of no new material representations or if these are not achieved the application will be reported back to Committee for further consideration.

**6 Availability of members attending site visits (if required)**

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## Strategic Sites Committee minutes

Minutes of the meeting of the Strategic Sites Committee held on Thursday 25 November 2021 in The Oculus, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF, commencing at 2.00 pm and concluding at 4.24 pm.

### Members present

P Bass, A Bond, N Brown, P Cooper, M Fayyaz, P Fealey, R Newcombe, J Ng, A Turner (Chairman), P Turner, J Waters (Vice-Chairman) and A Wheelhouse

### Agenda Item

#### 1 Apologies for absence

No apologies had been received.

#### 2 Declarations of interest

Councillor J Waters declared that he had submitted an objection in response to the planning application in Item 3 (PL/21/3151/OA) and that he wished to address the Committee in objection; he would not take part in the debate nor vote on the Item.

Councillor A Wheelhouse declared a personal interest under the Council's Code of Conduct as a member of Beaconsfield Town Council who had made representation on PL/21/3151/OA. Councillor Wheelhouse stated she was also Chair of the Beaconsfield Society. Councillor Wheelhouse declared she had not expressed a view on the application when discussed at meetings. She had not pre-determined the application and had an open mind, would listen to the debate and come to a decision.

Councillor J Ng declared that he was a member of Beaconsfield Town Council; he had not participated in discussions on application PF/21/3151/OA and had come to the meeting with an open mind.

Cllr Waters left the table and joined the public gallery.

#### 3 **PL/21/3151/OA - Land adjacent to Amersham Road and Minerva Way, Beaconsfield**

Proposal: Outline application for the erection of residential dwellings including affordable housing (Use Class C3), new vehicular access points off Amersham Road and the Eastern Relief Road, a local centre including a community building (Use

Classes E(a)(b)(c)(d)(e), F1(d)(e), F2(a)(b) and C3), a primary school and pre-school (Use Classes E(f) and F1(a)), public open space and associated infrastructure (matter to be considered at this stage: access).

A site visit was carried out on 23 November 2021.

J Fannon, Consultant Planning Officer, provided the following update since the agenda had been published:

- There had been a further representation from a member of the public in support of the application.
- Further officer comments had been received from the Highways Team regarding the assessment of the Travel Plan which was deemed to be acceptable.
- There was a correction to the report in that paragraph 6.7 should be deleted; it did not change the overall analysis or reasons for refusal.

Speaking as a Buckinghamshire Councillor, Councillor Anita Cranmer.

Speaking as a Buckinghamshire Councillor, Councillor Jonathan Waters

Speaking as a representative of Beaconsfield Town Councillor, Councillor Alastair Pike, Mayor Beaconsfield.

Speaking as objector, Dr Les Davies.

Speaking as the agent on behalf of the applicant, Mr Michael Davies.

Following a thorough debate; it was proposed by Councillor R Newcombe and seconded by Councillor N Brown that the application be refused for the reasons listed in paragraph 8 (pages 58-60).

**Resolved:** that the application be **refused** for the reasons listed in paragraph 8 of the report.

**4 Availability of members attending site visits (if required)**

Not required.



## Report to Strategic Planning Committee

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<b>Application Number:</b>	19/00148/AOP
<b>Proposal:</b>	Outline Planning Application (with all matters other than means of access reserved) for a residential development of up to 420 dwellings (including affordable housing), and associated infrastructure including provision of open space (including formal playspace); car parking; new pedestrian and cycle linkages; landscaping and drainage works (to include SuDS attenuation) and two new accesses off Osier Way and one new access off Gawcott Road. Includes demolition of the existing pigsty.
<b>Site Location:</b>	Land off Osier Way, East of Gawcott Road and South of Buckingham Ring Road, Buckingham, Buckinghamshire
<b>Applicant:</b>	Wates Developments Ltd
<b>Case Officer:</b>	Philippa Jarvis
<b>Ward(s) affected:</b>	Buckingham West
<b>Parish-Town Council:</b>	Buckingham Town Council and Gawcott Parish Council
<b>Date valid application received:</b>	15 January 2019
<b>Statutory determination date:</b>	24 March 2021

### Recommendation

The recommendation is that the application be deferred for approval subject to the satisfactory completion of a legal agreement to secure the following:

- Provision of a minimum of 35% on-site affordable housing (and related controls – tenure mix, pepper potting, timing of delivery etc)
- Provision of custom / self-build (5% to be negotiated depending on evidence of demand)
- Provision of on-site public open space and its future maintenance / management
- Provision and future maintenance / management of off-site biodiversity enhancement
- maintenance / management scheme for SuDS in perpetuity,
- Provision of various off-site highway works and sustainable access improvements

- Financial contributions towards off-site highway works (TRO) and monitoring of Travel Plan
- financial contribution towards the provision of new and/or enhanced bus infrastructure and services or community transport to serve the site
- financial contribution towards primary, secondary and special needs education provision
- financial contribution towards off-site sport & leisure facilities as necessary in accordance with the SPD and accompanying Ready Reckoner

subject to the receipt of no new material representations and conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused.

## **1. Summary & Recommendation/ Reason for Planning Committee Consideration**

- 1.1. The application seeks outline permission with only access to be determined at this stage for a development of up to 420 dwellings on a large site of just over 23 hectares located in open countryside to the south-west of the town. It is bounded by Osier Way and various commercial premises and the A421 by pass along its north-eastern boundaries, Gawcott Road to the west and open countryside to the south and south-east. The Buckingham Industrial Park (key employment site) lies to the east, to the south of which is the Buckingham Neighbourhood Development Plan (BNDP) site Q allocated for 10 hectares of employment development. The site lies just beyond the identified boundary settlement area (BSA).
- 1.2. The application site is VALP allocation site BUC046 which is one of two allocations for Buckingham which comprise the strategic allocation for the town in accordance with policy D2. The allocation which relates to a site of 22.7 ha. is allocated for 420 dwellings and green infrastructure / landscape buffer to the southern boundary with a number of criteria to be satisfied.
- 1.3. The first key issue relates to the principle of development on this site. Policy BUC046 is now the most up to date policy of the development plan and takes precedence over the relevant policies of the Buckingham Neighbourhood Development Plan (BNDP). Policy HP1 of the BNDP states that development will be supported within the BSA for new housing at the sites set out in the accompanying table. The table identifies 5 sites providing a total of 617 dwellings with a reserve site of 300 dwellings. The proposed development would therefore be contrary to this policy as it is not one of the identified sites within the BSA. However, given the recent adoption of VALP including policy BUC046, which now provides the most up to date policy in this respect, the conflict with BNDP policy HP1 can only be given very limited weight, and the principle of the residential development of the site is acceptable.
- 1.4. The proposal would deliver both market and affordable housing, with a proportion of self / custom build according to demand, through the S106 agreement. A good mix of size and type of dwellings would be provided and overall the proposal would make a significant contribution to housing supply in the area. The Local Planning Authority can currently



demonstrate a five year supply of housing, albeit this site is relied on as part of that deliverable supply.

- 1.5. The site lies in the open countryside for the purposes of the development plan and national policy. The introduction of built development on the site would result in harm to the intrinsic character and beauty of the countryside, resulting in a significant change of character and incursion of built development into the open countryside, beyond the current built up area of the settlement. However, these impacts would be mainly localised in nature and would be mitigated to a degree by the proposed strategic landscaping that would be provided around the site boundaries and within the site itself, including in particular the open space buffer with tree planting to be provided along the southern boundary. The site is not considered to be a valued landscape and overall, the adverse impacts in this respect should be afforded moderate negative weight.
- 1.6. The Council and the applicants have spent considerable time negotiating the highway and transport impacts and the appropriate mitigation requirements. The main impacts would be on the A421 and its junctions within the vicinity of the site. However, it has been agreed that these can be mitigated through various junction improvements together with a commensurate contribution to the Buckingham Transport Strategy to offset the impacts on the A421/Tesco roundabout through broader measures. With these mitigation measures in place, it is concluded that there will not be severe impacts on the highway network. The site would be served by three new access points, two along Osier Way and one off Gawcott Road. Appropriate visibility splays can be achieved when taking into account the reduction in speed limit that will be sought along the Gawcott Road via a Traffic Regulation Order, to which a contribution will be sought via a S106.
- 1.7. In terms of sustainable transport links, it is recognised that the site is not located in close proximity to facilities in the town centre and in particular, the primary school that is intended to mainly serve the development as that is the only one that has the capacity to extend to accommodate the new pupils. However, in terms of some facilities the site is well located, for instance the Aldi superstore at the junction of Osier Way and the A421, local employment areas and also within reasonable walking distance of the leisure centre and secondary schools. New combined footway / cycleways will be provided, connecting through the site to link with improved footways and cycleways beyond the site towards the town centre, to encourage the use of sustainable modes. However, existing bus stops are beyond the 400m 'walkable' distance therefore a new bus stop along the A421 for the X5 service will be provided. In addition, the development will incorporate a spine road sufficient to accommodate a bus which, together with a contribution towards the provision of a bus service to serve the site or to enable an existing service to be re-directed through it, will ensure that the site is served by public transport.
- 1.8. The majority of the site is located in flood zone 1 though some areas of localised groundwater flooding are known to occur including along the ordinary watercourse that runs through the centre of the site. The LLFA initially raised concerns that the FRA and associated drainage information did not fully address possible flooding risks, particularly in

relation to detailed modelling and ground water flooding risks. Additional information was sought that demonstrates that flood risk can be mitigated and that the flooding issues that occur can be dealt with such as to result in an overall improvement to the current situation. A suitable fully detailed surface water drainage scheme will be required to provide on-site attenuation in accordance with SuDS measures and ensure that there will be no risk of flooding elsewhere.

- 1.9. The proposal will result in the loss of some trees to facilitate accesses and drainage features but there is scope to provide significant new planting to maintain natural capital and contribute to habitat creation. No veteran or ancient trees, nor those of high landscape or biodiversity value are to be removed. Detailed negotiations have secured appropriate net biodiversity gains to include off site mitigation and the applicant has confirmed that the national licence approach will be followed to ensure appropriate mitigation of any impacts on protected species. The proposal will secure good levels of green infrastructure with adequate levels of on-site formal and informal areas, including a NEAP and three LEAPs and overall, it has been demonstrated that a net gain will be achieved.
- 1.10. As mentioned above, the site comprises VALP allocation (BUC046) which requires a landscape led approach and a development layout that is based on a design code, which can be secured via condition. The development is also accompanied by a Transport Assessment and FRA which demonstrate that access, transport and flood risk impacts will be acceptable and that the outline surface water strategy will secure 'design for exceedance' and that the necessary upgrade to sewerage infrastructure can be provided.
- 1.11. No other adverse environmental impacts are envisaged, and whilst there would be impacts on the adjoining residential properties, these would not be significantly harmful and would be outweighed by the public benefits of the development. In addition, commensurate contributions would be secured via S106 to mitigate the impact of the development on local infrastructure.
- 1.12. It is concluded that overall the principle of the proposal would accord with the most up to date part of the development plan, that is policy BUC046 which allocates the site for residential development. There would be a moderate level of harm due to loss of the intrinsic character and beauty of the site and incursion of built development into the open countryside, beyond the existing and planned built up area of the settlement leading to a breach of VALP policy NE4 to which moderate negative weight should be given. Notwithstanding the conflict with this policy and the conflict with BNDP HP1, it is concluded that the proposal would, subject to necessary conditions and obligations, comply with other relevant policies of the development plan, in particular policy BUC046, such that overall there would be no conflict with the development plan.
- 1.13. NPPF paragraph 11 states that in the above circumstances, planning permission should be granted without delay, though it will be necessary to ensure that a satisfactory S106 agreement is completed first. Having regard to S38(6) of the PCPA, it is concluded that

there are no material considerations that indicate a decision other than in accordance with the development plan.

1.14. Therefore, it is recommended that the application should be approved, subject to the prior completion of a S106 agreement to secure the matters set out above, with conditions to be deferred and delegated to officers.

## **2. Description of Site and Proposed Development**

### *Site Description*

- 2.1. The application site lies to the south west of Buckingham comprising a site area of just over 23 hectares. It consists of a mixture of arable farmland, some pasture and woodland comprising a large central area and mature tree belts fronting Osier Way. Further mature trees mark the northern boundary with the A421 Buckingham by-pass. The agricultural land comprises approximately two thirds Grade 3a with the remainder Grade 2.
- 2.2. There are no public rights of way within the site but a public bridleway (GAW/18/1) runs along part of the eastern boundary from Osier way, then progressing south within farmland. A further public footpath (BUC/13/1) runs from the same point along Osier Way at the eastern end of the site, but in a south-easterly direction alongside the commercial premises.
- 2.3. The site is bounded by agricultural land to the south, with further woodland areas. To the north-east along Osier Way are a number of modern commercial units including those within the Swan Business Park, which includes an Aldi supermarket, and further to the south Natco Foods. Further commercial units lie to the east further along Osier Way.
- 2.4. Residential properties fronting the northern end of Gawcott Road adjoin the sites north western boundary. To the south west of the site on the other side of Gawcott Road lies a further residential property with adjoining small business estate. The village of Gawcott lies about 1.5km to the south west of the site.

### *Proposed Development*

- 2.5. The application is in outline with only means of access to be determined at this stage. The proposal, which has been amended during the course of the application, now comprises of the following documents:
  - a) Site location / boundary plan
  - b) Access plans – Gawcott Road site access (ITB11061-GA-007 Rev D), Osier Way Priority Junction and site access (ITB11061-GA-009 Rev C), Osier Way proposed access with Swan Business Centre Road (ITB11061-GA-013 Rev C)
  - c) Land Use Parameter Plan (2492/A/1200/B)
  - d) Illustrative Master Plan (2492/C/1005/SK/B revised 08.06.21)
  - e) Illustrative Landscape Masterplan (2662-LA-04 REV. P2)

- f) Illustrative Public Open Space Strategy (2662-LA-05 REV. P1) and accompanying note dated May 2021.
- g) Planning Statement (as updated by Addendum dated August 2021)
- h) Design and Access Statement (Updated June 2021)
- i) Flood Risk Assessment, Drainage Assessment, as updated by FRA and Drainage Assessment (March 2019), further response dated June 2019 and
- j) Transport Assessment plus additional information dated October 2020 (junction mitigation options), March 2021 (Transport Technical Note ref: ITB11061-017a)
- k) Framework Travel Plan
- l) Ecological Appraisal dated November 2019, revised mitigation strategy and updated habitat impact assessment calculator dated May 2021
- m) Arboricultural Implications Report dated June 2021, including Tree Protection Plan
- n) Ground Appraisal Report
- o) Landscape and Visual Impact Assessment, addendum July 2019 and update June 2021
- p) Agricultural Land Quality Report, July 2021
- q) Sustainability and energy statement
- r) Noise Assessment Report
- s) Air Quality Assessment
- t) Utilities Report
- u) Heritage Assessment
- v) Archaeological Statement
- w) Statement of Community Engagement

2.6. The development is proposed to be served by two accesses onto Osier Way and by a single access onto Gawcott Road. In addition, there would be two pedestrian / cycle only accesses onto the A421 and one linking to the northern (cul de sac) end of Osier Way adjacent to the Swan Business Park. A potential link to the bridleway running along the eastern boundary is also indicated.

2.7. The Illustrative masterplan indicates that there would be two main areas of built development, the larger to the north-west of the retained central woodland and a smaller area to the south-east. Both areas would be served by areas of green infrastructure incorporating formal and informal play areas and open space, together with attenuation

basin as part of the SUDS drainage. Footway / cycleway routes would run through the central woodland to connect the two areas.

2.8. The Design and Access Statement Addendum sets out the following 'Parameters and Principles' (summarised):

- A varied mix of dwelling types and sizes reflecting the current need in the local area as identified in the HEDNA (Housing and Economic Development Needs Assessment) 2017.
- A range of proposed densities – lower densities towards perimeters of the developed areas (15-30dph) and higher (30-45dph) towards the centre of these areas.
- Buildings will be no higher than 3 storeys (9.5m).
- An outward facing development which overlooks key spaces such as the public open spaces, play areas and retained woodland areas.
- The positioning of built form to maintain key views through the site towards Buckingham to the north.
- Focal buildings are placed at key junctions, nodes and vista stops.
- An informal network of well overlooked and safe streets linking key communal spaces.
- Green corridors along the southern boundary to provide an appropriate interface with the rural edge of the development and other retained woodlands within the site.
- A tree belt adjacent to the existing properties located along Gawcott Road.
- Significant areas of Public Open Space designed to form inclusive and connected additions to the public realm and encourage mixed use activity.
- Creation of new walking and cycling connections through the site that integrate and enhance existing movement networks and public rights of way.

2.9. The design proposals also include the identification of character areas and related typologies and landscape strategy to reflect the characteristics of the site and its relationship with adjoining areas. Sustainability measures include making best use of natural light, provision of private space and home office facilities, using responsibly sourced materials, water efficiency measures and sustainable waste / recycling at both the construction and occupation stages. The design process has also had regard to Secured by Design principles, and this will be taken forward in the detailed design stages.

### **3. Relevant Planning History**

- 3.1. 18/02792/SO – proposed request for an environmental impact assessment in respect of a residential development on a site of 25.8 hectares; EIA not required, dated 11<sup>th</sup> October 2018.

### **4. Representations**

- 4.1. Buckingham Town Council object to the application on the following summary grounds (the response is set out in full in Appendix 1):
- Many consultee comments have not been addressed
  - Concern about location of site notices

- Whilst the housing will assist in meeting needs of those on the housing list, it must be supported by adequate infrastructure
- Site is not allocated in the BNDP Policy HP1 and for good reason as it is outside the settlement boundary, separated from the rest of the town by a business park and busy A421
- Schools, particularly primary, are not within a reasonable walking distance
- Adjoining sites will not provide sufficient employment result in increased use of cars
- Locating development at some distance from amenities, where it would be car dependent, is contrary to principles of good town planning
- Highway Officer still has concerns regarding effect on the bypass roundabout
- No proof that bus improvements will be secured, the Embleton Way service is not well timed for school trips
- Concerns regarding flooding / capacity of existing systems
- Object to use of shared services
- Should LPA be minded to approve set out a number of requirements

4.2. Gawcott with Lenborough Parish Council objects to the application, in summary on grounds that:

- Village needs to retain individual identity
- Does not comply with the BNDP
- In absence of assurances that development will be supported by necessary infrastructure, should be rejected
- Highway concerns, new crossings will cause further delay
- Increase vehicles/HGVs through village – need for a strategic transport plan,
- Full scheme of road and speed limit improvements needed
- Needs proper consideration of education needs, schools are not within easy walking distance and will increase car use
- Without assurances about adequacy and future capacity of water / sewage infrastructure application should be rejected
- Buildings greater than two storeys would be out of keeping on the Gawcott Road
- Social housing must be allocated to local people, the shortage in the north of the district being particularly acute
- Lack of connectivity highlights the inappropriate location
- Fails to meet principles of the NPPF and three dimensions of sustainable development

4.3. The Buckingham Society also object on grounds relating to traffic impacts, lack of connectivity to existing town, insufficient affordable housing, lack of play areas and need for new primary school to serve this and all other new developments on this side of the town.

4.4. A significant number of representations have been received objecting to the application on grounds relating to traffic impacts, highway safety, impact on natural environment, need for development, outside settlement boundary contrary to neighbourhood plan, lack of

and poor connectivity with local infrastructure, particularly schools and health, higher dwellings inappropriate and relationship with existing adjoining dwellings.

## **5. Policy Considerations and Evaluation**

### **Introduction**

- 5.1. For the purposes of the determination of this application the development plan comprises the Vale of Aylesbury Local Plan (2021) (VALP) and the Buckingham Neighbourhood Development Plan (2015) (BDNP). In accordance with S38(6) of the Planning and Compulsory Purchase Act, 1990, the determination must be made in accordance with the development plan unless material considerations indicate otherwise. Therefore, VALP is considered to be an up to date plan, and in accordance with para 220 of the NPPF the plan has been examined in the context of the NPPF 2012 and apply to the policies in this plan.
- 5.2. The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (PPG) are important material considerations.
- 5.3. The main issues to consider are the principle of development in this location, whether it provides for a satisfactory level of affordable, other housing types and a suitable mix to meet community needs, impact on the character and appearance of the countryside, landscape and settlement character, the impact on the transport network and whether it will promote sustainable transport modes, environmental issues including the impact on climate change, flooding and drainage, ecology, use of natural resources and building sustainability, and whether it makes provision for infrastructure contributions to mitigate impacts.

### **Principle and Location of Development**

VALP: S1 (Sustainable development for Aylesbury Vale); S2 (Spatial strategy for growth) and S3 (Settlement hierarchy and cohesive development), BUC046 (Land off Osier Way, south of A421 and east of Gawcott Road)); BE2 (Design of new development).

BDNP HP1 (Allocate land for 617 new dwellings)

- 5.4. The site is allocated in the VALP for residential development (policy BUC046) and this supports the development of the site for 420 homes and green infrastructure / landscape buffer; 130 homes to be delivered 2020-2025 and 290 homes to be delivered 2025-2033. The policy goes on to set out the following site-specific criteria:
  - Provision of at least 420 dwellings at a density that takes account of the adjacent settlement character and identity
  - The development shall be based on a design code to be prepared for the site because it is a large strategic site in a sensitive location on the edge of the settlement
  - The site will be designed using a landscape-led approach. The development design and layout will be informed by a full detailed landscape and visual impact assessment (LVIA) to be submitted and agreed by the council. A landscape mitigation scheme that reduces

wider landscape and visual impact will be required on the southern boundaries of the site

- The development must provide a satisfactory vehicular access to be agreed with Buckinghamshire Council. The access should be off Gawcott Road and Osier Way. A transport assessment will be required to demonstrate access and impact are acceptable and achievable by all modes of transport
- At the planning application stage, a site-specific flood risk assessment and surface water drainage strategy will be required. Any development must have consideration for its impact on the Buckingham and River Ouzel IDB drainage district and be aware of its byelaws. Detailed modelling will be required to confirm the 1 in 20, 100 and 1,000 year extents and 1 in 100 year plus climate change extents on the ordinary watercourse through the centre of the site. Other sources of flooding, particularly surface water flow routes, should be considered as part of a site-specific flood risk assessment. Development proposals must meet the 'Guidance for site design and making development safe' in the SFRA Level 2
- Drainage designs should 'design for exceedance' and accommodate existing surface water flood routes e.g. from Gawcott Fields.
- An assessment of sewerage capacity and water resources and water supply network will be required in consultation with Anglian Water. The water supply network is likely to require an upgrade by Anglian Water to serve the level of growth on the site. The Buckingham Wastewater Treatment Works needs upgrading and the delivery of the site will need to be aligned with investment in Anglian Water's Asset Management Plan.
- A financial contribution will be required towards funding appropriate elements of the Buckingham Transport Strategy.

5.5. The site lies outside the built framework of the town and the identified Buckingham Settlement Boundary (BSB) as designated through the BNDP. It therefore lies in the countryside for the purposes of planning policy.

5.6. BNDP Policy HP1 states that 'development will be supported within the boundary settlement area for new housing as set out in Table 1 and as shown in the site allocation plans..... provided the development meets the requirements set out in the policies of this plan.' The site is not one of the allocated sites and in fact was rejected as a suitable site through the BNDP process.

5.7. Notwithstanding the above, given that VALP has now been adopted and is the most up to date plan the policies within this plan take precedence in any conflict between development plans. Given policy BUC046 of the VALP the development of the site for residential purposes is acceptable in principle as it is supported by the most up to date part of the development plan.,

5.8. In terms of general location relative to the built-up area of Buckingham, it can be noted that the site is somewhat 'cut-off' from a number of the facilities within the main part of the town and particularly the town centre, by the A421. However, it is within reasonable walking distance of some (Aldi, employment areas, facilities in the southern part of the town – leisure centre and some schools) and the proposal incorporates a number of improvements to pedestrian / cycleways to enhance this connectivity as well as



improvements to public transport (as detailed in later sections). Therefore, overall it is in a location which in principle can be made accessible in terms of sustainable transport links. These matters are considered in more detail below.

- 5.9. The BSB runs along the northern boundary of the site and incorporates the existing residential properties along the northern end of Gawcott Road. In settlement pattern terms, it would relate well to the existing built-up areas of the employment development on Osier Way and the residential properties on Gawcott Road, albeit would extend built development further south than currently existing in this area, though not any further south than the nearby BNDP employment allocation (site Q) to the east. Given the open nature of much of the southern boundary of the site, careful treatment will be needed to ensure that an appropriate new countryside boundary is created.
- 5.10. Overall, having regard to the above, it is considered that the principle of development as proposed in this location would be acceptable. Whilst the site is currently only in a reasonably accessible location, improvements can be secured to ensure that this is improved to an acceptable degree. As set out later in the report the Highway Authority are requesting that the S106 includes a comprehensive package of off-site and onsite mitigation measures to improve the sites connectivity by sustainable modes. It is considered that these measures would reinforce the locational sustainability of the site to an acceptable level.

#### **Housing Supply, Affordable Housing and Housing Mix**

VALP policies BUC046 (Land off Osier Way, south of A421 and east of Gawcott Road), H1 Affordable Housing, H6a Housing Mix, H6c Accessibility, H5 Custom / self-build

BNDP HP3 (allocate land for self-build), HP4 (Provide diverse housing mix), HP5 (Provide affordable housing)

#### *Housing Supply – General Position*

- 5.11. The latest (September 2021) Five Year Housing Supply Position Statement for Aylesbury Vale area shows that the Council can demonstrate a 5.47 years supply of deliverable housing sites. In accordance with NPPF paragraph 73. This calculation is derived from the new standard methodology against the local housing need and definition of deliverable sites set out in the NPPF and NPPG. It also assesses the deliverability of sites against the new definition set out in the NPPF glossary. However, this site is included as one of the deliverable sites in that supply as part of the VALP BUC0046 allocation with delivery of units within the 5-year period and beyond.
- 5.12. The site would therefore contribute to the five-year housing supply as well as the longer term and provide associated benefits in meeting the ongoing need for housing. There is no

reason that the site could not be delivered in line with the identified trajectory period which would be a significant benefit

- 5.13. Further benefits would arise as a result of the related construction jobs and in the longer term to the local economy through the increased population, which would contribute to the local economy, and this matter is afforded considerable weight.

#### *Affordable Housing*

- 5.14. VALP Policy H1 states that a minimum of 25% of dwellings on sites of 11 dwellings or more should be affordable. It also sets out a number of additional criteria that will need to be met in relevant circumstances, including that such housing will need to take account of the Council's most up to date evidence of housing need and any available evidence regarding local market conditions.
- 5.15. BNDP policy HP5 requires sites of 1 hectare or over (or 25 dwellings or more) to provide 35% affordable housing, subject to viability, and should be accompanied by an affordable housing plan setting out mix, location and phasing. It also refers to the latest evidence of affordable housing need as set out in the HEDNA.
- 5.16. The VALP Inspector's Report noted that some neighbourhood plans required higher percentages (than in the VALP policy) and that these were justified at the time of the making of those plans. These policies exist side by side and the fact that BNDP policy HP5 requires a greater proportion does not mean that it is inconsistent with VALP policy H1 which sets a minimum requirement. Therefore, in this case, the higher BNDP policy applies.
- 5.17. The applicant has confirmed a willingness to meet this policy requirement and for this to be secured via a S106 agreement. Given that this is an outline scheme, that agreement will set out the key requirements which have been agreed by the applicant (tenure mix – 75% rented and 25% shared ownership, overall mix of housing sizes and types, avoidance of clustering, and 15% Category 3 of Document M wheelchair accessible housing and remainder to meet category 2, accessible / adaptable housing). Details required by the affordable housing plan will also be secured and through S106.
- 5.18. In addition, and in order to further address VALP policy H6c which requires that all development will meet and maintain high standards of accessibility so all users can use

them safely and easily, 15% of the affordable units will be wheelchair accessible. A S106 would need to secure these matters and is being progressed on this basis.

- 5.19. The scheme would therefore provide a policy compliant level of affordable housing subject to the above requirements being secured via S106 agreement. This would be a significant benefit of the development.

*Housing Mix / Custom & Self Build*

- 5.20. Local and national policy requires a mix of dwelling type and size to be delivered to ensure that it meets current demand and provides for inclusive and mixed communities. In addition, national policy states that local planning authorities should plan for the needs of people with disabilities and the PPG refers to households with specific needs. VALP policy H6a requires a mix of housing to be provided and H6c requires that all development meets and maintains high standard of accessibility.
- 5.21. In terms of the market housing mix, this should satisfy the most up to date evidence at the appropriate time (consideration of reserved matters in this instance); at this time these requirements are set out in the HEDNA and this and any other relevant evidence will be taken into account in the assessment of the reserved matters applications. BNDP policy HP4 requires that on developments of more than 50 dwellings, there should be a wide mixture of housing types from 1 to 5 bed dwellings; this can be secured via condition to be agreed at the reserved matters stage.
- 5.22. This is an outline scheme and therefore the exact mix of housing has not yet been determined. However, the application indicates that a mix of dwelling types are proposed ranging from two to five bedroom dwellings and that these would be distributed across the site through the identified character areas to reflect the different character and constraints of the different parts of the site. To ensure that the final mix which would come forward as part of the reserved matters scheme meet policy requirements, to include a proportion of 1 bed dwellings, a condition can be imposed to ensure that regard is had to BNDP Policy HP4 and emerging policy H6a of VALP and the HEDNA.
- 5.23. In respect of custom / self-build, BNDP policy HP3 supports their provision on sites other than the allocations. VALP policy H5 expects developments proposing 100 dwellings and above to provide a percentage of serviced plots in this regard, the overall numbers/proportion being determined on a site by site basis having regard to the evidence of demand and viability. In this regard, it is considered that a 5% proportion should be sought as a starting point, to be secured via the S106 agreement and the appropriate level varied having regard to the evidence of need at the time. This site is not one of the identified sites in emerging policy H6b relating to housing for older people. Having regard

to this and taking into account the mix of housing to be secured it is considered that policy HP3 and emerging policy H6b are adequately addressed.

- 5.24. Having regard to the above matters it is considered that the development would make a significant contribution to housing supply and the provision of a policy compliant level of affordable housing, all of which could be secured via S106 or conditions as appropriate. Overall, it is concluded that the proposal would provide a good range of housing, with an appropriate percentage of affordable and custom / self-build housing to contribute to meeting the needs of the community and overall housing supply of the district. On this basis the development would accord with the Development Plan policy, in particular VALP policies H1, H5, H6a, H6b, H6c and BUC046 and BNDP policy HP3, and the NPPF, and the benefits arising in this regard should be accorded significant weight.

### **Countryside, Landscape and Settlement Character**

VALP policies BUC046 (Land off Osier Way, south of A421 and east of Gawcott Road), BE2 Design of new development, NE4 Landscape Character and NE7 Best and Most Versatile Agricultural Land

Aylesbury Vale Landscape Character Assessment

- 5.25. The above policies seek to ensure that new development reflects the character of the existing settlement in respect of, amongst other things, local distinctiveness, scale and landscaping; that it respects and complements the physical characteristics of the site and its surroundings, the historic scale and context of setting and the natural qualities and features of the area; and that that it includes landscaping to help buildings fit in with and complement their surroundings. Furthermore, development should take a landscape led approach and have regard to Landscape Character Assessments, minimise impacts on visual amenity and be supported by appropriate mitigation to overcome any adverse impacts.
- 5.26. NPPF paragraph 174 seeks to ensure that development contributes to and enhances the natural and local environment by recognising the intrinsic character and beauty of the countryside and wider benefits from the natural capital. VALP policy BUC046 also emphasises that a landscape led approach should be taken, informed by a fully detailed Landscape and Visual Impact Assessment (LVIA) and that a landscape mitigation scheme that reduced the wider landscape and visual impact of the development will be required on the southern boundaries, to maintain the rural character of the new settlement edge created and provide a transition to the countryside.

### *Countryside / Settlement Character Impact*

- 5.27. The site is located within the open countryside outside the settlement boundary and as noted in the BNDP, is part of the open land surrounding the built-up area which contributes to its identity as a rural settlement. The proposed residential development will

inevitably result in the loss of its current open, natural appearance and intrinsic character and beauty as referred to in paragraph 174 of the NPPF.

- 5.28. However, whilst it is not currently accessible by the public, having no public rights of way over it, there are nearby routes, albeit views of the site from those to the east are screened by the existing woodland areas on the eastern edge of the site. It nevertheless sits within an area of open countryside that in settlement pattern terms, is outside the obvious built up limits and separated by existing areas of mature woodland. Therefore, in visual terms, the proposal will be seen as a built incursion of the countryside. However, it will adjoin and relate to the existing development along Osier Way and the residential properties in Gawcott Road.
- 5.29. The proposal will incorporate an open landscaped buffer along its southern boundary with undeveloped areas maintained to reflect existing field patterns. This would comprise a suitable transition to the open countryside beyond and provide an appropriate countryside edge to the development. Overall, whilst extending the built up area to the south west, it is considered that the proposal will relate reasonably well to the existing settlement pattern and the scale of change to settlement character for this part of the settlement as a result of the development would be moderate.

#### *Landscape Character and Visual Impact*

- 5.30. As noted above, VALP policy NE4 seeks to ensure that development respects and complements the physical characteristics of the site and its surroundings, the historic context and the natural qualities and features of the area and recognises the individual distinctiveness of particular landscape character areas set out in the LCAs and minimises impacts on visual amenity and avoids the loss of important views and landscape features. Policy BUC046 states that the site should be designed using a landscape led approach with the design and the application supported by an LVIA.
- 5.31. The site is not within an AAL but lies within the *LCA 4.3: Gawcott Ridge (LCA)* as identified in the Aylesbury Vale Landscape Character Assessment. The overall condition of the landscape is defined as weak with visual detractors at the edge of Buckingham; the sensitivity of the landscape is defined as moderate. The character assessments guidelines are to 'restore and enhance'.
- 5.32. The Council's 'Strategic landscape and visual capacity study' provides the following commentary:

*"The site consists of a series of undulating arable fields in varying sizes intersected by boundary hedgerows and bound by housing to the west along Gawcott Road and tall dense native vegetative screening to the north, east, parts of the west and south. To the north east the topography drops away revealing commercial units (such as Travis Perkins, Carpet right and Topps Tiles). Views into the site are limited to properties to the north west (approximately 15 upper storey views into part of the site), 1 scattered farmstead to the south west (with oblique filtered views) and a PROW to the*

*south east and south west corner. Though pylons intersect the site the character of the site rural in nature with little evidence of urban fringe character.*

- 5.33. The LVIA provides a detailed assessment of the landscape character and visual impacts. The accompanying Illustrative Landscape Strategy sets out how the development of the site will respond to those potential impacts and indicates the areas of existing planting and woodland areas that will be retained as well as identifying new areas of strategic planting within and around the site to seek to minimise the impacts of the development and assist in assimilating the development into this edge of settlement location.
- 5.34. The applicant's LVIA concludes that the sensitivity of landscape and visual receptors has taken due account of the local value attached to the site and adjacent rural landscape and that the development of the site has the potential to respond positively to site character in the context of local landscape and provide appropriate landscape treatments to reduce the residual adverse landscape effects. The permanent loss of greenfield will result in a high magnitude of change to local landscape and significance of effects initially moderate adverse. The permanent change will also result in change to views though mitigation will reduce these impacts and the proposal will respect cultural heritage, enhance GI connectivity and promote healthy living and increase enjoyment of the countryside.
- 5.35. It is considered that the applicant's LVA provides a reasonable assessment of the landscape and visual impacts. The illustrative masterplan shows that the landscape-led approach advocated by VALP policy BUC046 can be achieved with relatively generous areas of GI provided incorporating most of the existing valuable natural features that contribute to the existing character. These would be supplemented by suitable new planting including compensatory planting for those features that necessarily require removal to facilitate the development (e.g. for the site access points) and other tree losses within the site.
- 5.36. The Council's Landscape Officer notes that the site is rural in character and appears part of the landscape context apparent further south. It is agreed that the change from greenfield to housing would be significant for this site and its surrounding landscape, bringing the urban edge further south past existing development into open countryside. There is a risk that it would appear separate from the existing residential areas. In terms of visual impact, it is noted that views would be experienced from Gawcott Road and to an extent, from the PRow to the south. Residents along Gawcott Road will also experience some adverse visual impacts. Lighting impacts are not assessed and a condition to require further details is considered appropriate. It is concluded that the landscape strategy proposals would not be able to fully mitigate the high impact on landscape character. However, this needs to be considered in the context of this being an allocated housing site delivering the strategic growth for the plan. The specific housing policy requires a landscape led approach which this has adopted and was accompanied by a LVIA and a landscape mitigation scheme that reduces wider landscape and visual impact upon the southern boundaries of the site. As

seeks the proposal has an acknowledged impact on the landscape character but is in accordance with the requirements of landscape requirements of policy BUC046. .

- 5.37. It is of note that the map accompanying BUC046 identifies some areas within the central part of the site and on boundaries as 'not built development' as referred to at (d) of the policy text. Paragraph 1.23 of VALP explains that these areas are required due to flood risk vulnerability and / or the recommendations from the Strategic Landscape and Visual Impact Capacity Study and should normally only comprise GI, landscape or biodiversity mitigation or water compatible development unless a sequential test has been passed. It is considered that the information provided with the application demonstrates that there would be no adverse impacts in terms of flooding or landscape character such as to prevent some built development, albeit the illustrative framework plan indicates that woodland, hedges and trees will nevertheless be retained in these areas.
- 5.38. The development will be accompanied by a detailed landscaping scheme, to be secured as a reserved matter, which will ensure that a suitable scheme of appropriate native species will be provided and implemented as part of the development.
- 5.39. Overall, it is considered that the proposal results in landscape and visual impacts but these have been largely addressed by the approach advocated in the site specific policy BUC046. As such the proposal is in accordance with the relevant policies BUC046 and NE4.

#### **Green infrastructure and networks (including public open space)**

VALP Policy I1 Green Infrastructure and BUC046 (Land off Osier Way, south of A421 and east of Gawcott Road)

- 5.40. The provision of multi-functional Green Infrastructure (GI) is an important element of the wider provision of infrastructure necessary to support healthy, sustainable communities in both urban and rural communities and the NPPF states that decisions should enable and support healthy lifestyles through its provision.
- 5.41. In general terms green infrastructure (GI) is the term used to encompass all 'green' elements of a scheme; it comprises a network of ANGsT (Accessible Natural Green Spaces) compliant high quality, multi-functional green spaces that are intended to improve connectivity of towns and villages and the wider countryside, primarily to provide for a connected network of 'green' links providing pathways for humans, animals and plants. It can include a wide variety of uses and habitats including woodland, water courses, ponds, footpaths, cycleways and other recreational routes and uses. The approach set out in BNDP policies is somewhat outdated in that it uses the more traditional approach of securing outdoor space based on standards related to play and recreation rather than the multi-functional approach that is now advocated through the NPPF.
- 5.42. VALP Policy BUC046 states that the site is allocated for 'homes and green infrastructure', highlighting the importance of that use to the overall development of the site. Policy I1

requires all development over 10 dwellings to provide for accessible natural green space to meet standards set out in Appendix C on site.

- 5.43. The standards for ANGST at appendix C, set out the precise type of on-site provision depending on the nature and location of the proposal, existing open space provision in the area and the quantity of space needed. The standards clarify that in addition, the quantitative and access standards for areas of play (LEAPs, NEAPs, MUGAs and skateboard parks) as set out in the Fields in Trust (FiT) publication will be required. These are considered separately below.
- 5.44. The policies of VALP are therefore up to date in terms of the approach in the NPPF which seeks to provide inclusive developments that support healthy lifestyles through the provision of a GI network that comprises of a range of different typologies and performs a range of functions. The standards comprise quantitative and accessibility elements to ensure that such areas are within reasonable distance of people and meet Natural England's belief that everyone should have access to good quality natural GI. Long term stewardship of these areas is vital to ensure that they are maintained to high standards in perpetuity.
- 5.45. The site contains a number of existing natural features, woodland, tree belts and stream, which are to be integrated into the green infrastructure (GI) provision providing a good basis for a network of links which are capable of being retained within any proposed residential development. The application is accompanied by an illustrative public open space strategy which is based on the GI network to meet the above requirements. New footway and cycleway links will be provided throughout the GI network. The illustrative strategy is accompanied by a note which sets out the policy requirements that have been taken into account.
- 5.46. In terms of the overall quantity of space, the Parks and Recreation Officer has confirmed that the POS strategy plan demonstrates that the amount and nature of the GI accords with the required standards in VALP. It makes good use of the existing natural features on the site and will be suitably enhanced through the proposed tree mitigation plan and ecology / biodiversity enhancements (set out in more detail below).
- 5.47. The proposed development would, in principle, provide for an acceptable amount, location and form of GI which can be secured via conditions / obligations with full details to be set out in reserved matters applications. As such the proposal would accord with local and national policy.

#### **Play Areas / Sport and Recreation**

BNDP policy CLH2 (Play provision for new developments), VALP Policy I1 and I2 (Sports and recreation) and Appendices C and D, Fields in Trust (FiT) National Guidance

- 5.48. VALP policy fully reflects the current national approach in respect of this issue whereby such provision should be considered as an element of the overall multi-functional GI, albeit



certain elements need to be considered separately and the standards reflect those provided within the FiT guidance. These policies also provide the basis for securing appropriate financial contributions towards off-site sport and recreation facilities that cannot be practically provided on site.

- 5.49. VALP policy I1 states that recreation facilities can be provided on the same site as the publicly accessible GI provided they are compatible with it; such land is in addition to that required as GI. Whilst such facilities can co-exist in a properly master-planned approach they must be treated separately so that they can viably function.
- 5.50. In respect of the FiT guidance, a NEAP and three LEAPs are required to be provided on site as well as a contribution to off-site facilities (Table 2), to be secured as a proportionate financial contribution through the S106 agreement.
- 5.51. The proposed location of the play areas has been the subject of much discussion in order to secure a suitable large area of central open space and to ensure that the facilities are convenient to both the east and west built up parts of the site. The applicant has therefore amended the illustrative POS plan to show a revised location for the NEAP about halfway along the southern boundary which would be connected to both east and west areas by footways and cycleways, in compliance with the distances set out in the FiT guidance. A concern has been raised from an urban design aspect regarding the location of this play area and the extent to which nearby dwellings will be able to provide natural surveillance. However, the illustrative layout indicates that there will be housing on the opposite side of the road which should provide a level of surveillance; in any event, these matters can be addressed at the detailed stage to ensure that a suitable and safe facility can be provided in an accessible location. Otherwise, areas of POS are distributed throughout the site to reflect its shape being some 1,000 m in length (east to west) with one LEAP serving the smaller eastern element and two in the larger western part of the site. Some smaller pocket parks could also be achieved at detailed stage of the design and layout. The laying out and timely provision and maintenance of these spaces will be secured via S106 and conditions.
- 5.52. In respect of other sports and recreation provision, VALP policies allow for such provision to be made through necessary and proportionate contributions to the enhancement of off-site facilities; Appendix D sets out how such off site requirements will be calculated, though the detailed operation of the relevant policies are to be set out in a new SPD. The requirement for such facilities to be provided on site will depend on the nature and location of the proposal, existing facilities in the area and the quantity / type needed. If taking into account the ability of the development site to accommodate the facility required and the ability for such facilities to be more appropriately provided off site, then a financial contribution will be sought.
- 5.53. In respect of this proposal, a small ball court will be provided as part of the NEAP, but no other on-site facilities are proposed. It is noted that a number of representations,

including from the Town Council, suggest that the site should be provided with more on-site facilities. However, the applicant has agreed to make an appropriate contribution towards off-site provision in respect of those facilities that cannot be provided on site. The Council's Parks and GI Officer has confirmed that this requirement is justified and the appropriate contribution which has been calculated in accordance with the previous 'Ready Reckoner' (to the extent that it still provides an up to date basis for the calculation of relevant costs), will go towards relevant local projects, to be confirmed through the S106. At this stage, discussions have focussed on the potential to enhance the Scout Hut & Community Centre on Embleton Way and the Lace Hill Sports and Community Centres. Consideration is also being given to the potential to contribute towards a new Arts Centre to be provided off site, as referred to in the BNDP.

- 5.54. Overall, it is considered that the proposed on-site provision will be appropriate and acceptable and that a contribution towards other facilities, which can only practicably be provided off site, will be justified. This will ensure compliance with VALP policies I1 and I2. It will also accord with the NPPF which seeks to ensure healthy, inclusive communities that promote social interaction and enable and support healthy lifestyles through the provision of safe and accessible green infrastructure and sports facilities and layouts that encourage walking and cycling.

#### **Trees and Hedges**

BNDP policy DHE1 (Protect existing trees and provision of trees in development), VALP Policy NE8 (Trees, hedgerows and woodlands)

- 5.55. The northern and eastern site boundaries (along Osier Way and adjoining the bridleway) are marked by woodlands / tree belts with further mature hedgerows and individual trees along the A421 and some internal field boundaries. In addition, there is a significant woodland area within the central part of the site. These natural features are important elements of the site, particularly in the south east part of the site where the existing tree belt provides a natural screen for the development.
- 5.56. BNDP policy DHE1 seeks to ensure that wherever possible existing trees are retained. VALP Policy NE9 takes an approach that is consistent with the balanced approach of the NPPF in that it seeks to ensure that development enhances the district's tree resources, that development resulting in the loss of trees or hedgerows that make an important contribution to the character and amenities of the area will be resisted and that where the loss of trees is considered acceptable, adequate replacement with trees sympathetic to local tree species will be required. The loss of native hedgerows should be compensated for and a net gain achieved and retained / new hedgerows should where possible be protected by appropriate buffers. NPPF paragraph 174 states that decision should contribute to and enhance the natural environment by recognising the wider benefits from

natural capital and ecosystem services, including the economic and other benefits of trees and woodlands.

- 5.57. The application is accompanied by a detailed Arboricultural Impact Assessment which was reviewed by the Tree Officer. He notes that some individual and groups of trees will need to be removed as well as hedgerows, and that full details of the implications for root protection areas is not known at this stage. However, he is satisfied that the indicative layout appears to have given consideration to and be broadly sympathetic to trees whilst providing scope of significant new planting and enhancement. Therefore, it is reasonable to assume that the site can tolerate the level of development proposed. A condition to secure a full arboricultural impact assessment and updated tree survey is recommended.
- 5.58. It is concluded that overall, the proposal will provide appropriate enhancement in terms of tree and hedge cover and will ensure that the new development will be satisfactorily assimilated into its countryside setting, in accordance with policies NE9 of VALP and DHE1 of BNDP and the NPPF.

### **Ecology**

BNDP - DHE2 (Standard of ecological information required to minimise the impact on natural habitats), DHE4 (Protection of movement corridors), DHE5 (Biodiversity in development landscaping), VALP policy NE1 (Biodiversity and geodiversity)

- 5.59. BNDP policies require that development minimises impact on natural habitats and species resulting in net gains to biodiversity; that measures to protect and enhance bat corridors are incorporated as appropriate and that landscaping schemes should maximise benefits to biodiversity through the use of native species.
- 5.60. VALP policy NE1 seeks to help deliver the Buckinghamshire and Milton Keynes Biodiversity Action Plan (BAP) targets in the biodiversity opportunity areas. A long-term monitoring and management plan will be required for biodiversity features on site. It is considered that this policy is generally consistent with NPPF Paragraph 174 seeks to ensure that new development minimises impacts on biodiversity and provides net gains overall. NPPF paragraph 120 seeks to encourage multiple benefits from both urban and rural land and to take opportunities to achieve net environmental gains such as new habitat creation.

### *Biodiversity Impacts & Net Gain*

- 5.61. The submitted ecology report notes the absence of any statutory or non-statutory nature conservation sites on the application site, but there are non-statutory sites within 2km. It concludes that the site is dominated by habitats of low ecological importance though the proposal has sought to retain the majority of features of importance such as hedgerows,

around the watercourse, and where habitats are lost, new habitat creation is proposed to offset losses, in conjunction with landscape proposals.

- 5.62. Furthermore, there is a need to ensure a biodiversity net gain overall, with VALP policy NE1 providing the most up to date local guidance in this matter, as it is considered to be generally consistent with the national guidance in the NPPF and other up to date (DEFRA) guidance. Full detail on the levels of biodiversity net gain (BNG) (through the use of a biodiversity metric) and associated Habitat Impact Assessment calculations have been sought in order to ensure that net gains overall can be achieved. It is of note that whilst a net gain of 10% is often referred to, this is not yet set in either local or national policy and cannot therefore be insisted on.
- 5.63. In respect of the overall BNG, further information has also been requested as the original information did not demonstrate net gains as required. The updated information includes the delivery of additional scrubby woodland and semi-improved grassland within the site as well as off-site provision through the management of woodland plots to the south. These will be improved and managed in accordance with a specific management plan and overall these will achieve a net gain of 14.7%, The Council's Ecology Officer has confirmed that the revised information that has now been received is acceptable and that an appropriate level of net gain can be achieved.
- 5.64. The need for a detailed management plan to ensure that the overall net gain for biodiversity is acknowledged as essential by the applicant and it is agreed that this can be secured via a suitably worded condition to secure a Landscape and Ecology Management Plan for the on-site elements. It is likely that such future management will be undertaken by a management company to be set up for the site and which will be secured through the S106 agreement; the S106 will need to refer to this requirement to ensure that it is properly dealt with in the future.

#### *Protected Species*

- 5.65. In respect of protected species, various surveys were conducted (dormouse, bats, badgers and reptiles, invertebrates, etc). The applicant's ecological appraisal notes that the design evolution of the site took into account the various related constraints and many of the identified habitats are unaffected by the development, including the retention of the woodland areas and areas within the 10m buffer of the stream. It also identifies various measures to mitigate and compensate for the impacts on these, including that any badger set impacted will be closed under licence and a new sett provided. A lighting strategy, to be secured via condition, will minimise light spill and potential impacts on habitats. The following measures have also been identified:
- Management of retained woodland
  - Increase size and quality of pond

- New planting of woodland and scrub, planting with attenuation basins to improve biodiversity value,
- Nesting provisions for birds and roosting provision for bats, development permeable for hedgehogs

5.66. Specific mitigation is now proposed for the dormice given that whilst the proposal would result in only small areas of habitat, there would be some fragmentation due to creation of gaps in hedgerows. There may also be disturbance from the new dwellings and higher predation from cats. Mitigation in the form of new planting along the south-western boundary and the retained, enhanced central woodland will be specifically managed for dormice. In addition, the management of the off-site woodlands to improve condition will benefit this species, as well as provide additional permanent nest boxes for others.

5.67. The works proposed with the potential to impact dormice will be covered by an EPSM licence the application for which will commence once planning permission is obtained. Given that protected species have been found on the site which will require the applicant to obtain a licence, the Local Planning Authority should have regard to the three tests that need to be satisfied before such a licence can be issued. These tests are:

1. A licence can be granted for the purposes of preserving public health or public safety or other imperative reasons of overriding public interest including those of a social and economic nature and beneficial consequences of primary importance for the environment.
2. The appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.

5.68. The appropriate authority shall not grant a licence unless they are satisfied ‘that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range. With regard to the three tests which are required to be satisfied if a licence from Natural England is required, the following is noted:

1. The activity is imperative for the reasons of overriding public interest in order to meet the housing needs of the area, as identified through VALP, and in providing much needed affordable and other housing and contributing to the local economy.
2. This site has been found to be the most suitable site for the planned growth of the town though the VALP process and to that extent other sites were not considered to provide satisfactory alternatives.
3. The submitted Ecological Appraisal demonstrates the favourable conservation status of the species will be maintained though appropriate measures and mitigation.

5.69. The Council’s Ecology officer has confirmed that the further information provided regarding the proposed mitigation / compensation strategy for dormice now properly

supports the previous information and the proposed mitigation and enhancement measures set out in the original Ecology Report. The Council is now satisfied that in the light of the evidence provided to indicate that a protected species licence can be obtained and the recommendations can be satisfactorily secured via condition to prevent the development from proceeding without the EPS licence.

- 5.70. In respect of the other protected species, the submitted appraisal is considered to be a reasonable assessment of the presence of protected species and the mitigation / compensation measures are suitable and necessary to ensure the protection and recovery of these species.
- 5.71. Overall, it can be concluded that the proposal will protect and enhance the biodiversity and geodiversity of the site and provide for a net gain overall. The protected species on site will be appropriately safeguarded through appropriate conditions. Suitable conditions will secure necessary mitigation and compensation and a Landscape and Ecological Management Plan will ensure suitable management of these areas in perpetuity. This will accord with VALP policy NE1, the policies of the BNDP and the NPPF.

### **Agricultural Land & Soils**

VALP policy NE7 Best and most versatile agricultural land (BMV)

- 5.72. VALP policy NE7 states that subject to the development allocations set out in the VALP the Council will seek to protect BMV for the longer term. It seeks to ensure that where BMV is proposed for development, those areas on site should preferably be used as green open space and built structures avoided and that where significant development would result in the loss of BMV consent should not be granted except in certain circumstances.
- 5.73. Paragraph 175 of the NPPF states that plans should allocate land with the least environmental and amenity value, where consistent with other policies in the Framework and that where significant development of agricultural land is demonstrated to be necessary areas of poorer quality land should be preferred to those of higher quality.
- 5.74. The supporting agricultural land report confirms that the site comprises grade 2 and 3a agricultural land. The proposal will therefore result in the loss of BMV. However, the report also confirms that the majority of the land around the town is of a similar quality. In addition, given that the issue of the loss of BMV has already been appropriately considered as part of the process of its allocation through VALP and that the policy above specifically excludes the allocations, there is no objection in this regard and no conflict with local or national policy.

### **Transport matters and accessibility**

BNDP policies I1 (New disabled access requirement for new pedestrian routes)

VALP: T1 (Delivering the Sustainable Transport System), T2 (Supporting and Protecting Transport Schemes), T4 (Capacity of the transport network to deliver development), T5

(Delivering transport in new development), T6 (Vehicle parking), T7 (Footpaths and cycle routes), T8 (Electric Vehicle Parking), and BUC046 (Land off Osier Way, south of A421 and east of Gawcott Road)

*Impact on highway network*

- 5.75. Policy BUC046 requires a Transport Assessment (TA) to demonstrate that the impact of the development is acceptable and that a financial contribution towards the appropriate elements of the Buckingham Transport Strategy (BTS) will be required. The site will take access directly off Osier Way (two separate access points) and off Gawcott Road. The Highway Authority (HA) has been in lengthy negotiations with the applicant to ensure that there is an appropriate and relevant amount of information relating to the assessment of the impact of the development to support and clarify the information already provided in the TA.
- 5.76. As set out in the consultee response, this has demonstrated the need for a number of off-site mitigation works to ensure that there is no adverse impact on the local highway network, and the A421 in particular. Specifically, these works include:
- A421/Gawcott Road – widening and increased flare length of Gawcott Road and Embleton Way
  - A421/Osier Way – widening of all arms, additional lane to western arm and increased flare lengths to Embleton Way
- 5.77. Improvement works are not proposed to the A421 / Tesco roundabout as it was concluded that any changes would simply impact on other arms of the roundabout, therefore a contribution to the BTS is sought instead to seek other sustainable enhancements to seek to reduce the use of the private car.

*Safe and suitable access*

- 5.78. Access is to be determined at this outline stage. As noted above, the proposed development would be served by two access points off Osier Way and one off Gawcott Road. It is concluded that they would provide safe and suitable accesses subject to necessary visibility splays being provided. These new access points do result in the need to remove some existing trees and vegetation, but as indicated above, satisfactory compensatory planting can be achieved.
- 5.79. There is also a need to reduce the speed limit along the Gawcott Road which is currently 60mph. This would be secured via a Traffic Regulation Order, the cost of which should be borne by the developer, to be secured via the S106 agreement. This would involve the introduction of a gateway feature along Gawcott Road just to the south of the proposed

access, to the north of which the speed limit would be reduced to 30mph (though subject to full safety audit).

#### *Sustainable transport links*

- 5.80. The policies of VALP reflect the key objective of government policy in the NPPF which is to achieve sustainable development and a vital part of this is to ensure that development, particularly significant development, is in a location that is or can be made sustainable from a transport aspect. A key consideration is that policies should provide for high quality walking and cycling networks and that sites are in locations where the number of journeys can be minimised and are supported by sustainable transport.
- 5.81. The policies of the VALP seek to ensure opportunities to maximise the use of sustainable modes is achieved and that otherwise development provides for any necessary improvements. The BNDP includes amongst its objectives to improve movement into and around the town in a healthy and safe manner, specifically promoting cycling, walking and ease of access for the disabled. A further objective is to secure developer contributions to provide and enhance cycle and pedestrian connections.
- 5.82. There have been a number of concerns expressed by the representations received that the site is in a poor location in respect of its accessibility to local services and facilities with the A421 considered to be a barrier to facilitating connectivity. However, it is considered that the site can be considered in principle, through its VALP allocation, to be in a generally sustainable location but significant improvements will be required to ensure that it can be made fully sustainable in terms of encouraging sustainable modes of transport. In accordance with NPPF, priority should be given to pedestrian and cycle movements and to facilitate access to high quality public transport.
- 5.83. In addition to the main points of access noted above, additional pedestrian / cycle points of access will be provided, two onto the A421 and one onto the northern (cul-de-sac) end of Osier Way. A further potential link to the bridleway running along the eastern boundary is also shown.
- 5.84. This has been the subject of detailed negotiations between the highway authority and the applicant to ensure that as far as possible and reasonable, good quality routes are provided, or existing ones enhanced. The following specific off-site improvements in respect of pedestrian and cycle access are therefore proposed:
- A footway connection at the proposed Gawcott Road access to link with the existing footway on its eastern side.
  - A 3.0m wide shared footway/cycleway on the northern side of the access road of the proposed Osier Way primary access, crossing Swan Business Park and continuing further along Osier Way to the north by widening of the existing footway, thereby connecting Osier Way to the A421.



- Provision of a 2.0m wide footway on the southern side of the access road of the proposed Osier Way primary access to be continued south on Osier Way and including uncontrolled crossing points on Osier Way.
- Provision of an uncontrolled dropped tactile crossing on the Swan Business Park arm of the proposed new primary Osier Way access roundabout to provide a continual 3.0m wide shared footway/cycleway to the Osier Way north arm of the proposed new primary Osier Way access roundabout. The provision of a dropped tactile crossing to tie in with the existing footway network north of the Swan Business Park arm
- Provision of layby for vehicle parking for the Swan Business Park. The inclusion of double yellow lines around the turning head of this junction to prevent parking.
- Provision of a 2.0m wide footway on either side of the proposed secondary access on Osier Way.
- Provision of a 2.0m wide footway on both sides of the access road to connect with Gawcott Road at the proposed Gawcott Road access. Provision of new 2.0m wide footway north of the access on the eastern side of Gawcott Road, to connect with existing footway network. Provision of a gateway feature to the south of the Gawcott Road access along with road markings such as dragons' teeth and coloured speed roundels to encourage slower speeds on approach to the junction with the A421.
- A new controlled Toucan Crossing to the east of the A421 / Gawcott Road / Embleton Way roundabout, along with improvements to the informal crossing points on the western side of the junction and a footway connection on the southern side of the junction to connect to Gawcott Road.

5.85. The applicant has produced a plan which identifies these proposals and how they provide improved connections with local facilities. In general, these provide improved links to the secondary schools and leisure centre (about a 20 min. walk / 5 min. cycle). Walks to the nearest primary schools are further however, the George Grenville Academy being a 20 min walk and the Lace Hill Academy being around a 25 min. walk. However, whilst these are the nearest primary schools in the town, the site is actually within the catchment of Buckingham Primary School (Page Hill) which is a considerable distance from the site (around 2 miles) and not within practical or easy walking distance, particularly given that the last part of the journey is uphill. The information also shows that the infant school in Gawcott would be a 20-minute walk, but there are no footways along Gawcott Road to serve this route therefore this is considered to be impractical.

5.86. However, some facilities are much closer, with the Aldi supermarket and employment areas on Osier Way itself within a very short walk.

5.87. The site itself will also incorporate a network of footways and cycleways to promote use of the sustainable modes and provide convenient links to the improved off-site routes. Overall, it is considered that these enhanced routes will provide safe and attractive

connections to maximise these sustainable modes, albeit recognising that the use of the car for some journeys will remain the preferred option.

#### *Public Transport*

- 5.88. The site is outside a reasonable walking distance of existing bus stops therefore this mode also requires considerable improvement. This matter has also been the subject of detailed discussions between the HA and the applicants. This has resulted in agreement to provide a pair of new bus stops on the A421 along the site frontage, to include bus shelters and Real Time Passenger Information (RTPI).
- 5.89. In addition, negotiations have secured the expansion of the existing 131/132 service to cover the site, Mount Pleasant, Tingewick Road and potentially Gawcott village. To facilitate this the internal spine road within the development site will be designed with minimum carriageway of 6m. An annual contribution for 5 years would also be required to fund a new bus service, allow for extension of existing service or provide community transport.
- 5.90. The proposal is also supported by a framework travel plan which sets out a number of measures to ensure that the residents of the site are fully informed of the sustainable options to provide knowledge and information of a good choice of modes of transport. Whilst this did not include all the important elements sought by the HA, a fully detailed TP would be required by condition in any event.

#### *Parking*

- 5.91. At this outline stage, the adequacy of car and cycle parking provision cannot be assessed as there are no detailed layouts to consider. However, it will be appropriate to secure suitable levels as per the new adopted VALP standards and a condition will be needed to ensure that the reserved matters applications provide for such parking to meet the Council's latest standards and policy. Conditions are recommended to secure provision in accordance with the Council's standards.

#### *Refuse Collection*

- 5.92. In respect of the collection of refuse, further detail on this matter would be assessed at the reserved matters stage. However, it is likely that bins would be provided for in external areas in a convenient location within the garden for the dwellings and communal bin collection areas will also be provided as appropriate.

#### *Conclusions in respect of transport matters / accessibility*

- 5.93. It is concluded that the proposal would not have a harmful impact on the local highway network and would be served by safe and suitable access points and a range of sustainable transport choices to connect to local amenities and facilities, subject to appropriate conditions and obligations. Whilst the location of some amenities means that it is likely

that residents would use their car, the proposal would secure the provision of an onsite bus service that would connect with the town centre, providing a reasonable and practical alternative to the car for many trips.

- 5.94. Therefore, subject to appropriate obligations and conditions, the proposal would accord with local and national policy, in particular with the aims of VALP policies T1, T4, T5, T6, T7 and T8 and with the NPPF. It could be implemented without harm to highway safety and convenience and sufficient parking, cycle parking and electric vehicle parking can be provided. On this basis transport matters should be afforded neutral weight.

### **Flooding and drainage**

BNDP I6 (Rainwater collection), I5 (Sewage Management)

VALP policies BUC046 and I4 (Flooding) and I5 (Water Resources and Wastewater Infrastructure) and NPPF (section 14 in particular) and NPPG

- 5.95. National policy seeks to ensure that flood risk in an area is managed and reduced through the local plan by undertaking a strategic flood risk assessment, together with a sequential approach to development, locating vulnerable developments in areas at lower risk of flooding. Development proposals will be assessed through flood risk assessments where appropriate, a sequential approach to site appraisal and where necessary the exceptions test as set out in the NPPF and NPPG. Tables within the NPPG set out the relative vulnerabilities of types of development to flooding relative to the flood zones. Development will only be permitted in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and the benefits of the development outweigh the risks from flooding. Defended areas should be sequentially tested as though the defences are not there. BNDP policy I5 states that Buckingham has an evidenced sewage drainage problem and where necessary to serve the development proposal, an appropriate solution must be demonstrated.
- 5.96. VALP Policy I4 requires, amongst other things, the submission of site-specific flood risk assessments (FRAs) where the development is over 1 hectare in size or includes areas of flood zones 2 or 3. All development must demonstrate that the sequential test has been passed; the exception test will not apply to sites allocated in the plan. It goes on to require that development layouts are informed by drainage strategies including SuDS and including demonstration that surface water will be effectively managed and will not increase flood risk elsewhere taking into account climate change modelling and effects.
- 5.97. VALP policy BUC046 states that a site-specific FRA and surface water drainage strategy will be required, and sets out criteria to be met, including detailed modelling to reflect climate change requirements and other sources of flood risk in accordance with the SFRA. Drainage designs should 'design for exceedance' and accommodate existing surface water flood routes, e.g. from Gawcott Fields. In addition, an assessment of sewerage capacity and water supply will be required. The need for the upgrading of the Buckingham

Wastewater Treatment Works is identified and the delivery of the site will need to be aligned with the related investment plan.

- 5.98. The Local Lead Flood Authority (LLFA) originally commented that the submitted FRA and drainage strategy were incomplete in that they did not appear to take into account that the site is at risk of fluvial flooding, that outputs of modelling were missing, and that appropriate mitigation measures had been omitted. There was also a lack of a detailed assessment of existing surface water flood risk, the LLFA noting that the central water course was in an area of low to high risk and the ditches towards the eastern boundary were at high risk of surface water flooding, though noting that some works to these was proposed. Risks associated with ground water flooding were also inadequately assessed. Further information and detail of the Surface Water Drainage Strategy was also requested.
- 5.99. The applicant therefore submitted further updated assessments and the LLFA has now removed their initial objection. The updated information includes various mitigation measures to reduce flood risk, including raising crests to protect the drainage scheme, raising of finished floor levels and increased the size of the culvert on Osier Way. The information also incorporates measures to deal with flows from Gawcott Fields and additional measures in the event of groundwater emergence. In terms of the surface water drainage scheme, the principles are considered to be acceptable, though at the detailed design stage, further investigations of SuDS measures should be undertaken, including the use of permeable paving and rainwater harvesting, the latter being a requirement of BNDP policy I6.
- 5.100. The LLFA's original concerns regarding the level of information provided to demonstrate that the site can be served by a satisfactory surface water drainage scheme have been overcome through the submission of further information and they now have no objection subject to the imposition of appropriate conditions. These conditions will secure a fully detailed surface water drainage strategy, applying SuDS features as appropriate and necessary. As such it is considered that the development would be appropriately flood resilient and that surface water drainage has been accounted for.
- 5.101. With regard to foul drainage, Anglian Water has confirmed that the proposed strategy is acceptable and that in terms of Water Recycling Centre capacity, the applicant has provided phasing plans which will feed into their investment programme to ensure that the necessary upgrades are undertaken to meet the needs of the development.
- 5.102. It is concluded that the proposal will make appropriate provision for surface water and foul drainage and will secure measures to avoid / improve flood risk and will not result in increased flood risk elsewhere. It will therefore satisfy national policy and guidance and local policy in the BNDP and VALP policies BUC046 and I4.

### **Historic Environment / Archaeology**

VALP policy BE1 Heritage Assets

- 5.103. The BNDP has an objective to conserve and enhance the town's historic environment and its setting but does not contain any specific policy in this regard. The NPPF recognises that the effect of an application on the significance of a heritage asset (including its setting) is a material planning consideration. VALP policy BE1 requires all new development to conserve heritage assets in a manner appropriate to their significance, including setting, seeking enhancement where possible.
- 5.104. The site does not lie within a conservation area, nor would its development affect the setting of any conservation area or listed building. The submitted Heritage Assessment concludes that there could be slight/negligible changes in relation to views from St Peter and St Pauls Church and similar neutral/slight impact on Hill Farm to the south-east. There is no identified impact on Lenborough Manor Farm, the setting of the Gawcott or Radclive Conservation Areas and that distance, topography and intervening vegetation suggests the setting of the Stowe Landscape Gardens will not be affected.
- 5.105. An earlier archaeological report submitted by the applicant suggests that there may be moderate potential for Roman remains, with a subsequent geophysical report concluded that a range of possible buried features are likely to survive in the south-east area of the application site, likely dating from prehistoric to medieval period. However, due to the absence of significant archaeology within the trial trenches located on the site, it is concluded that no further work would be necessary in advance of development.
- 5.106. Thus, it is concluded that with the imposition of an appropriate condition, the proposal would ensure appropriate protection for and enhancement of the historic environment and thus complies with relevant national and local policy in this regard.

### **Raising the quality of place making and design**

#### VALP BUC046 and BE2 Design of New Development

- 5.107. The above policies seek to ensure that development is responsive to its context and provides a high quality, sustainable design. The NPPF also emphasises that development should make effective use of land whilst at the same time safeguarding and improving the environment. The recent updated NPPF also states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. The use of design codes is encouraged. Policy BUC046 requires that a landscape led approach be used, and that the development should be based on a design code due to the sensitive edge of settlement location.
- 5.108. The application being outline does not provide any detail to be approved at this stage regarding the layout and built character of the proposal albeit the illustrative landscape strategy and public open space strategy establishes that certain elements including

landscaping, GI / open space will be provided for in suitable locations within the site. The illustrative masterplan also gives an indication of how the site could be laid out.

5.109. In addition, the DAS sets out a number of design principles that are intended to inform the development of the site, and if appropriate, could provide a broad approach to the design code which will be required by condition. It also sets out a number of character areas to reflect the different site areas and context to provide a range of built areas and forms. The DAS sets out a number of principles which are repeated below:

- A varied mix of dwelling types and sizes reflecting the current need in the local area
- A range of proposed densities – lower densities towards perimeters of the developed areas (15-30dph) and higher (30-45dph) towards the centre of these areas.
- Buildings will be no higher than 3 storeys (9.5m).
- An outward facing development which overlooks key spaces such as the public open spaces, play areas and retained woodland areas.
- The positioning of built form to maintain key views through the site towards Buckingham to the north.
- Focal buildings are placed at key junctions, nodes and vista stops.
- An informal network of well overlooked and safe streets linking key communal spaces.
- Green corridors along the southern boundary to provide an appropriate interface with the rural edge of the development and other retained woodlands within the site.
- A tree belt adjacent to the existing properties located along Gawcott Road.
- Significant areas of Public Open Space designed to form inclusive and connected additions to the public realm and encourage mixed use activity.
- Creation of new walking and cycling connections through the site that integrate and enhance existing movement networks and public rights of way.

5.110. The Council's Urban Design Officer has commented that the illustrative layout of built form and open space is generally welcome, though additional areas of open space could be introduced in some areas, with more integration of SuDS and 'edible' landscapes. A number of key design principles are incorporated and these should be reflected in a Design Code which should come forward in advance of reserved matters to ensure that the site not only reflects the key characteristics of the town but also has its own positive and coherent identity. The updated NPPF also emphasises the importance of tree lined streets and that opportunities are taken to introduce trees elsewhere. These elements can also be incorporated in the Design Code.

5.111. Having regard to the above matters and acknowledging that further consideration would have to be given to these matters at the detailed design stage, it is concluded that the development of the site could achieve a high quality, beautiful and sustainable place and a sympathetic and fitting addition to the built form and settlement pattern, the principles of which would be set out within the Design Code to inform all reserved matters applications. It would thereby accord with local and national policy.

### **Building sustainability**

VALP policy C3 (Renewable Energy)

5.112. The application is accompanied by a sustainability and energy statement. It states that the dwellings will be constructed using enhanced fabric standards above that required by building regulations, reduced CO2 emissions and enhanced water use standards. Other sustainability measures are considered to be in the form of mixed tenure, provision of outdoor space, high standards of environmental construction and reference to Secured By Design standards.

5.113. This will be secured through the Design Code to be required by condition to secure compliance with local and national policy in this regard.

#### **Environment and Amenity of Existing and Future Residents**

VALP policy BE3 (Protection of the amenity of residents) and NE5 (Light pollution, air quality and contaminated land)

5.114. The relevant policies seek to ensure that a good standard of built environment is provided having regard to a number of factors. In terms of existing adjoining residents, those likely to be most affected are those in Gawcott Road adjoining the north-west of the site. These will experience temporary noise and other related impacts during construction and the completed development will result in a change of outlook to the rear. However, these properties have good sized rear gardens and the landscape strategy includes the provision of a tree buffer along the common boundary. The residents of the property further to the south will experience a change in outlook to the east and there will be increased levels of traffic along this road.

5.115. The following matters are also relevant to the future residents:

#### *Noise*

5.116. The site lies within proximity of a number of employment premises in Osier Way and the submitted noise report concludes that mitigation may be needed for those nearest affected properties. In line with the comments of Environmental Health, a condition is recommended to seek a further detailed scheme of mitigation.

#### *Air Quality*

5.117. The accompanying air quality report concludes that the local air quality impact of emissions from the traffic associated with the development is predicted to be negligible. Air quality impacts during construction are concluded to be satisfactorily controlled via condition and not significant.

#### *Contamination*

5.118. The site is understood to have previously only been used for agricultural purposes but includes the demolition of the existing old pigsty building. The submitted report suggests a number of further actions and surveys to include remediation method statement and verification plan to deal with any abnormal conditions and to secure necessary mitigation.

It is considered that in these circumstances, it would be necessary to impose a condition to deal with these matters.

#### *Construction stage impacts*

- 5.119. In terms of the construction stage of the proposed development, the workings on the site and associated vehicle movements will have some effects. However, most of these can be controlled through a Construction Traffic Management Plan (CEMP) which will cover a number of matters such as hours of operation, deliveries & construction including vehicle routing, on-site parking and storage, traffic management and measures to prevent damage and inconvenience arising from the use of local roads. This will ensure that such impacts will be minimised.

#### *Lighting*

- 5.120. At this outline stage there is no indication of what lighting is proposed but this can be controlled at reserved matters stage to ensure that the impact on the built and natural environment is minimised.

#### *Built environment / living conditions for proposed occupiers*

- 5.121. In terms of the proposed occupants, as the application is in outline only it is not possible to specifically assess the quality of the proposed individual dwelling plots and how they relate to each other. However, the DAS and accompanying sketch masterplan show that it should be possible to ensure a good standard of layout and amenity.
- 5.122. In addition, the Design Code to be secured will set out a number of design principles that will be adhered to in providing detailed schemes at the reserved matters stage that will ensure that high quality is achieved. This will include reference to relevant policy and guidance.

#### *Conclusions*

- 5.123. It is concluded that overall a good standard of built environment and amenity will be provided for the occupiers of existing and proposed dwellings, in compliance with the above policies.

#### **Employment issues**

BNDP EE1 (Allocate land for employment development)

VALP Policy E2 (Other employment sites)

- 5.124. The employment areas around Osier Way are not identified as one of the key employment sites in VALP but are still offered some protection through policy E2 as providing more flexible employment uses, allowing for the introduction of other uses compatible with the continued employment area. In addition, the BNDP allocates a further employment site to



the east of the application site to the south of the existing units on the south side of Osier Way.

- 5.125. It is considered that the proposed residential development will be compatible with and well separated from these and not threaten the continued existing and proposed employment uses in this area.

**Supporting high quality communications**

VALP policy I6 (Telecommunications)

- 5.126. In accordance with VALP policy I6, developers are also expected to have explored the option of providing on-site infrastructure, including ducting to industry standards in any new residential development for efficient connection to existing networks. This policy accords with paragraph 114 of the NPPF which states that a reliable communications infrastructure is essential for economic growth and social well-being and that policies should prioritise full fibre connections to existing and new developments. A planning condition will ensure that this is adequately addressed.
- 5.127. Paragraph 116 of the NPPF requires Local Planning Authorities to ensure that they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communication services. Given the nature and location of the proposed development, it is considered unlikely for there to be any adverse interference upon any nearby broadcast and electronic communications services as a result of the development.
- 5.128. Overall, it is considered that the proposal would accord with policy I6 of the VALP and with the guidance set out in the NPPF in this regard.

**Community Facilities & Infrastructure Impacts and Developer Contributions**

VALP policies – I2 Sports and Recreation, I3 Community facilities, infrastructure and assets of community value, Appendix D - The Standards for Sports and Recreation

Guidance: Fields in Trust - Planning and Design for Outdoor Sport and Play (2008);

Guidance for Outdoor Sport and Play (beyond the six acre standard) (England) (2020);

- 5.129. As noted in various sections above, there are a number of specific matters that would need to be secured via planning obligations, as conditions would not be appropriate. These are:
- 35% Affordable housing and 5% self/custom build housing
  - Provision and future management & maintenance of on-site GI and play areas to include commuted sums (should these areas be transferred to the Town Council)

and a bond to enable these areas to be delivered should they fail to come forward as part of the development

- Provision of off-site biodiversity enhancement areas to improve net gain overall, to include future management and maintenance in perpetuity
- Provision and whole life maintenance of the surface water drainage scheme
- Provision of off-site highway and sustainable transport improvements to be carried out by the developer via a Highways Delivery Agreement (including S278 agreement)

5.130. In addition, the development will generate a need for various forms of community and other infrastructure to mitigate its impact. However, some facilities can only be provided off-site as part of wider provision. In the absence of CIL it is necessary and justified to seek a number of financial contributions to provide for these.

5.131. The Community Infrastructure Levy Regulations and the National Planning Policy Framework state that obligations to secure such contributions within a section 106 agreement must meet the following tests:

- Necessary to make the development acceptable
- Directly related to the development, and
- Fairly and reasonably related in scale and kind to the development

*Financial Contributions towards Sustainable Transport / off-site highway works*

5.132. As indicated in the transport section above, and as set out in relevant policy, the proposal will need to be served by a specific bus service given that it is not located within reasonable distance of existing services. This is an important element of sustainable transport to ensure that the residents of the development have a real choice about how to travel, particularly given the location of the site relative to the town centre and other facilities that the residents will need to access on a daily basis. A contribution to secure either a diversion of existing bus routes or a direct community bus service, is therefore justified. The applicant has agreed to make a financial contribution to provide for this for an initial

period of 5 years to establish the service and this is considered to be proportionate to the impact of the development, taking into account existing means of sustainable transport.

- 5.133. The development also requires that the speed limit along Gawcott Road be reduced and this will also be secured via a proportionate financial contribution, with the Council carrying out the associated TRO and works.
- 5.134. Therefore, contributions towards these, including the necessary Traffic Regulation Order, are justified to enable the Council to undertake the works at the appropriate time. A travel plan monitoring fee will also be necessary to enable annual monitoring and review.

#### *Education*

- 5.135. The Education Officer has confirmed that there is insufficient school capacity locally. Secondary schools in the area are currently at capacity with a deficit of places projected. Primary places are close to capacity. There are plans to expand the existing schools to accommodate the increased demand from housing growth and therefore a contribution based on the per pupil cost likely to be generated by the development is therefore necessary and justified. The amount is calculated based on the latest related DfE costs and in accordance with well-established principles.
- 5.136. The Education Officer has confirmed that the contributions will be allocated to the expansion of Buckingham Primary and Buckingham Secondary as capacity is expected to be reached during 2021/22. These schools have the space to expand and plans are currently being progressed at the secondary school to increase the forms of entry with further needs to be monitored as this will depend on the type of families moving into the area and changes in the existing population. A feasibility study for the secondary school indicates that it has the potential to expand by 1fe to meet future growth.

#### *Sport and Recreation*

- 5.137. The development will increase demand for the provision of local and wider sport and recreation facilities, including sports playing pitches and hard courts and community centres. It is not feasible to accommodate such facilities on site due to the amount of land that is required and the need to optimise the delivery of housing and there is a lack of capacity in the local area. As noted above, there is the potential for the expansion of existing local facilities as well as the possibility of a local Cultural Arts Centre as referred to in the BNDP. Therefore, under the relevant policies, a proportionate contribution based on the estimated population arising from the development using the Council's Ready Reckoner is justifiably sought to ensure the necessary associated provision. The relevant

projects to be referred to will be agreed through the S106 negotiations having regard to the CIL regulations.

#### *Health Facilities*

- 5.138. Policy I3 requires consideration of the need for community facilities and infrastructure including doctor's surgeries. There is no site-specific requirement in policy BUC046 on health

#### *Primary care*

- 5.139. The CCG were consulted on 23rd January 2019. They responded on 28<sup>th</sup> January commenting that the development would result likely result in an increase in population of approximately 1000 new patients as result of the housing growth. In July 2019 NHS Buckinghamshire Healthcare provided a further consultation response and Regulation 122 CIL compliance statement in relation to this application. The response included an Impact Assessment Formula which identified a contribution of £791,650.00 was necessary. This contribution was required to provide additional health care services to meet patient demand which was detailed in their response.

#### *Acute and community healthcare*

- 5.140. The impact on acute and community healthcare is a material consideration. The NHS England funds the CCG who commissions the BHT to provide acute and community healthcare services to Buckinghamshire. This includes community, planned and emergency (major trauma and A&E), acute hospital medical and surgical care and specialist and tertiary health care. Part of the BHT catchment extends into Oxfordshire.
- 5.141. Buckinghamshire Hospital Trust (BHT) have requested contributions towards hospital services and the council have been in discussion with the Buckinghamshire Hospital Trust (BHT) regarding contributions sought in general terms towards the cost of providing capacity for the Trust to maintain service delivery during the first year of occupation of each unit of the accommodation on/in the development. In summary, BHT advise that the contract value for their funding is based on months 1 to 6 of the preceding years activity levels and does not take into account future planned housing though some element of demographic growth is factored in. Some additional funding is provided but this can depend on achieving surplus targets / improvement goals. BHT claim there is a 'funding gap' created by the lag between the new residents moving into the area and the date by which the government funding is actually received. The BHT emphasise that the contribution sought is to mitigate the impacts of a permanent gap in funding, not a lag, as the gap is not recovered retrospectively and will have a financial impact on the Trust, thus there is no double counting. Therefore, BHT is seeking funding for the gap period until the

NHS funding system pay the full cost of treating the extra patients and seeks a contribution of £791,650.00.

- 5.142. BHT goes on to say that the Trust's hospitals and community services are at full capacity and frequently experience major pressures and inability to cope with the increasing patient demand, with bed provision a key factor. The BHT considers that the population and household increase associated with the proposed development will significantly impact on the service delivery and performance
- 5.143. The BHT further note that based on the anticipated population from the proposed development, the demands generated over a 12 month period (including in respect of A&E admissions, day care, emergency and outpatient admissions), have been set out and a cost per person generated based on the 'cost per activity'. The BHT emphasise that the costs are related to the specific activities in the area of the site and therefore directly related to the development. They are based on the previous years' activity rates and provide an average figure for the previous 6 months – BHT argue that whilst these cannot be exact it provides a reasonable methodology.
- 5.144. To support their request BHT have provided a number of appeal decisions which have varied outcomes.
- 5.145. In considering any request for a financial contribution, the council would need to be satisfied that BHT has provided evidence and adequate justification to demonstrate in accordance with the CIL Regulations how the sums are necessary to make the development acceptable in planning terms or how they are directly related to the development or fairly and reasonably related in scale and kind to the development. (CIL Regulation 122).
- 5.146. There has been considerable discussion with BHT dating back to early 2019 regarding the request for contributions. Officers have raised concerns that the information provided to date is inadequate to enable the Council to conclude that their request meets the CIL tests in relation to the requested contributions towards service costs.
- 5.147. There are still a number of outstanding concerns relating to the request for contribution towards the cost of running services:
- a) Funding: Evidence used to justify the demand for funding and if directly related to development. Concerns over whether the funding gap is a genuine gap or a lag in funding having regards to the existing national funding mechanism for BHT, including funding for extra patients arising from predicted population flows as planned population increases are included in ONS projections. The ONS projections should be updated over the lifetime of the development including planned population updated.
  - b) Availability of funding from sources other than through the CCG.
  - c) Evidence related to data and methodology used , sources and underlying assumptions, indicators of population per household, assessing the impact of new

development compared to existing infrastructure requirements of the existing population including the appropriate allowance for concealed households and new population not otherwise in the local system.

- d) Evidence in establishing the direct link to development based on activity rates and population attendances / access to each of those activities, and allowance for services provided to residents by other Trusts.
- e) Funding use and monitoring: the need to connect the use directly to the specific development leads to questions over whether the additional funding would benefit the patients from a development, rather than reduce the need for central subsidy or be used to fill an existing deficit, and how the spend can be reasonably monitored and is capable of a reasonable degree of enforcement.
- f) Phasing of any contributions related to anticipated delivery rates

5.148. The Council has been working collaboratively with BHT in order to assess the potential for CIL compliant contributions for alternative provision in the way of capital costs arising from new development rather than revenue costs in light of the concerns raised. There has been some progress on this (capital costs) but there are issues which remain unresolved. No request for capital costs has been submitted in relation to this application

5.149. Paragraph 34 of the NPPF states that plans should set out contributions expected from development, for infrastructure including health. The BHT request for such contributions has not been made through the local plan process leading up to the adoption of VALP. The requested contribution has not been the subject of viability testing through the VALP process. The BHT representations were first submitted in January 2019 in relation to this application. Whilst discussions have taken place with BHT since 2019 the information provided to date is considered inadequate to satisfy the council that CIL Tests are met.

5.150. Officers have taken a judgement as to whether or not it is appropriate to delay the consideration of the application, for information which may or may not satisfy the CIL tests. At this point it is not certain whether a CIL compliant s106 methodology may be able to be achieved and in the case of capital costs a deliverable project, and this may take several months to work through.

5.151. The delay and uncertainty over this matter must be weighed against the potential delay and potential prejudice to the delivery of an important housing allocation at Buckingham to meet the planned growth for this area. It can be seen from the section on housing land supply above that such delay will put further pressure on housing land supply and will create difficulties in relation to the Council's ability to meet a five-year supply. This undermines important objectives in the NPPF which seeks to ensure an adequate supply to meet objective needs. For these reasons it is considered that the BHT request is outweighed as a matter of judgement at this stage by the significant delay and prejudice that would result in determining this application if the issues above were first required to be resolved particularly since, at present, there is no guarantee that the methodology and

contributions will be found to be CIL compliant. In addition, the provision of the, play spaces and other public spaces, with walking and cycling provision, encourages people to adopt a healthier lifestyle which is a net benefit in the round. On balance, the proposed development provides adequately for healthcare facilities in accordance with VALP policy and having regards to the CIL regulations

5.152. In the light of the above matters, it is concluded that a contribution towards a 'funding gap' for health facilities has not been fully justified.

## **6. Weighing and balancing of issues / Overall Assessment**

6.1. 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.

6.2. 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. In addition, Section 143 of the Localism Act amends 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:

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

6.3. 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, granting permission unless

- i. the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

6.4. It is noted that the proposed development would not accord with BNDP Policy HP1 as the site is outside the settlement boundary. However, National guidance is clear (NPPG para 36) that a neighbourhood plan must be in general conformity with, and plan positively to support, the strategic policies of the development plan. The recently adopted VALP is the most up to date plan and as the Local Plan contains the strategic policies for the plan area. The relevant VALP policy for this site is BUC046 which allocates the site for residential development and is a strategic policy. As such this policy carries greater weight in the decision-making process. This proposal has been assessed against this strategic policy and

found to be in accordance. The proposal has also been assessed against the other relevant detailed policies of both the Neighbourhood Plan and the VALP and found to comply with these policies. In conclusion it is considered that there is no conflict with the development plan and having regard to NPPF paragraph 11, the development should be approved without delay.

6.5. The concerns and objections of the Town Council and other residents have been mostly addressed in the above report. With regard to outstanding comments and the specific 'conditions' set out in the Ward Councillor, Town Council and Parish Council comments, the following responses are made:

- The lack of any on-site community centre / facility is noted, but this has not been identified as a necessary component of the site development through VALP policy BUC046. The site will be provided with significant areas of POS and play areas; further seating areas can be provided within these areas to encourage community inclusiveness and well-being.
- The issue of a local taxation is noted and whilst not a direct planning consideration, the issue of parish boundaries could be considered further as appropriate
- The Highway Authority is satisfied that the highway impacts can be satisfactorily mitigated and with measures to ensure the timely delivery of sustainable forms of transport so providing a real choice, there should not be a severe impact on the highway network. The TP will ensure that all residents are well informed. The provision of a 'green bridge' over the A421 is not considered a viable option.
- To clarify, the applicant has confirmed that the minimum 35% affordable housing is proposed – this would provide (up to) 147 dwellings, a significant contribution to housing need and provision
- The developer has given full consideration to the relevant biodiversity requirements, including relevant Acts, Regulations and Directives; it is acknowledged that the works affecting protected species will require licence
- The Buckingham Transport Strategy is to be taken forward through VALP but does not include the Western Relief Road as this was dropped for viability reasons and because the original allocation site in this area (BUC051) is not being taken forward
- The further consideration of an Education Strategy is a matter that can be pursued separately as appropriate
- Consultation with the Town Council and Gawcott Parish Councils can be undertaken at the appropriate stage

6.6. The main concerns of local residents are with regard to the highway impacts, conflict with the BNDP, weight to be given to the emerging plan and that such sites should be determined through the neighbourhood plan process, lack of connectivity with the town



and its facilities. It is considered that these matters are addressed in the above report – notably, the position is that now VALP is adopted, it provides the up to date policy context in terms of the principle of the residential development of the site.

- 6.7. With regard to other material considerations, it is of particular note that the site is allocated in the VALP under policy BUC046. The site is in a reasonably accessible location, and can be made suitably accessible through further measures, and will make a valuable contribution to the authority's housing supply both in the short term and medium term as part of the supply over the plan period. The site will also make a valuable contribution to affordable housing and self-build / custom housing. In addition, the site provides a valuable contribution to the 5 year housing supply. Overall, significant weight should be given to the benefits arising including the associated social and economic benefits.
- 6.8. Full and detailed consideration has been given to the specific issues arising from the scheme and, as set out within this report, this demonstrates the suitability of this site and proposal or the means by which it can be made acceptable.
- 6.9. Overall, taking into account the above full assessment, it is concluded that permission should be granted as soon as an appropriate S106 agreement has been agreed.
- 6.10. Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from

socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

## **7. Working with the applicant / agent**

- 7.1. In accordance with paragraph 38 of the NPPF (2019) 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.
- 7.2. The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 7.3. In this instance
  - The applicant was provided with pre-application advice,
  - During the course of the consideration of the application, there has been a continual and considerable dialogue with the applicant with a view to seek to resolve issues as they arose.
  - The applicant was provided the opportunity to submit amendments to the scheme/address issues arising.
  - The application was considered by the Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

## **8. Recommendation**

- 8.1. The recommendation is that the application be Deferred for approval subject to the satisfactory negotiation and completion of a S106 agreement to secure the requirements set out in the report, such approval to be subject to any conditions considered appropriate, or to refuse if a satisfactory S106 agreement cannot be completed for such reasons as officers consider appropriate.

## **APPENDIX A: Consultation Responses and Representations**

### Councillor Comments

**Councillor Stuchbury** - Raised strong and detailed objections to the application and asked that it be called in to committee irrespective of recommendation. These comments are detailed below:

#### **19/00148/AOP I'm intending to OPPOSE & ATTEND as local member**

Outline Planning Application (with all matters other than means of access reserved) for a residential development of up to 420 dwellings

*Members will note that at the date of validation of this application, the ruling local plan was the Buckingham Neighbourhood Plan, therefore*

*1. This application site is outside the settlement boundary, and not a designated site, contrary to Policy HP1. The Secretary of State had already upheld this policy in the matter of Moreton Road Phase III (14/02601/AOP) in July 2017.*

*2. Should the application nevertheless be approved, the proportion of Affordable Housing should be 35%, not the submitted 25% contrary to policy HP5. This meant a difference of 42 Affordable dwellings. Mention was also made of the DGLG figure (3686 in March 2018, quoted in the Buckingham*

*& Winslow Advertiser of 1<sup>st</sup> February 2019) for households on the waiting list in the Vale which showed a clear need for a higher %;*

*3. Connectivity with the town had not been demonstrated, particularly with respect to the schools. Lace Hill, Bourton Meadow and George Grenville were all an unfeasible walking distance for young children, and the result would be an exacerbation of the parent-car problem already very evident at all three schools;*

*4. Using the VALP figure of 1.5 working residents per dwelling gives a figure of 630 people seeking employment. Buckingham does not have this number of vacancies so a sizeable number of vehicles out-commuting will be generated at peak times; the applicants appear to think that all can be accommodated in the Industrial Park and thus walk or cycle to work. Members point out that the only employment development is to be at Silverstone and Westcott, neither of which are accessible by public transport or a safe cycleway; there is no cycle shop or repair service in Buckingham.*

*5. The complete lack - on AVDC's instruction – of any communal facilities other than play areas will reinforce the isolation of this dormitory estate beyond the industrial area and the bypass; there will be no opportunity to build a community spirit or integrate it with the town in the way that has proven successful at Lace Hill (which has a primary school and sport/leisure centre for 700 dwellings). Taken together with the 382 dwellings approved for the adjacent site diagonally across the Gawcott Road roundabout a total of 800 dwellings in this quadrant of the town will have no community meeting place, no facilities other than the Aldi store and no school within walking*

distance. It should be noted that the school in Gawcott is for juniors only, its infants department is in Tingewick.

6. The smaller (eastern) housing area is even more isolated, having only a footpath connection to the larger site and a single access on to a rough road; concern was expressed that a single access point was unsafe, in the event of – say – a fire or chemical spill at the factory opposite; an emergency access should be included.

7. Members my note the County Council) do not favour Shared Surface Streets; they are unsafe for pedestrians, children and the visually and physically disabled; if the refuse lorries cannot use them, bins get left out to reduce the hauling distance to the collection point, and they require more maintenance than conventional surfaces.

8. Water supply is inadequate, sewage capacity not mentioned (in the Utilities document) and concern was expressed that the small attenuation ponds might not be adequate for the amount of stormwater run-off, to the detriment of the wildlife dependent on the water courses, both on-site and downstream.

9. Planning Notices had not yet been posted at the site

**Further comments following receipt of amended plans:**

It is evident that this application is contrary to the Buckingham Neighbourhood Development Plan; it is not a designated site for housing in fact the original intention, not supported by AVDC, was to use of the land for to extend the industrial and employment areas outside the bypass.

The development doesn't cater for its own social and environmental implications in my opinion:

1. Being the far side of the existing industrial areas south of the bypass it is very much an isolated development devoid of natural connections to Buckingham. This will result in large amounts of vehicle journeys from the development to schools and other facilities not available within reasonable walking/cycling distance adding to those already using the over-stretched highway infrastructure around Buckingham. The nearest schools are a half-hour walk away from the nearest primary schools (Lace Hill Academy and George Grenville Academy), which is too far to expect small children to do each end of the day and there is no safe pedestrian route for older children to access any of the education establishments in town which will result in an increase in vehicle journeys at peak times as parents take their children.
2. This development of 420 houses has no social gathering point, further isolating this community with no public open spaces of any size or a community meeting hall. Developments should take consideration of their social impact on the social cohesion, well-being and mental health of all their residents and development which is so isolated with no interior means of social support could without any sort of hub fail to create a new community with the neighbourliness and sense of belonging that is so vital.
3. If the development is agreed the residents of this development will have two areas of local council tax that being Buckingham and Gawcott. With different local taxation, one a village community with no services which are chargeable of note, the other being a market town with the large expenses and responsibilities. One community with differing precepts is a cause for resentment, social division, disagreement and challenge. It would be

prudent, if the development was to be approved, that there was a re-alignment of the parish boundary in favour of the Buckingham.

4. Vehicle access to the community: there is a concern that this development will be a source of aggravation to all local residents if at peak times when the Buckingham bypass is at capacity it limits the scope for residents to access the A421, resulting in rat running through Gawcott seeking alternative routes to get children to school or for residents to access their employment.
5. It is important that the development if agreed recognises the Buckingham Neighbourhood Plan in respect of affordable housing and delivers the 35% in line with the Buckingham Neighbourhood Plan policy as this is the only legal development plan with potency at the current time and takes precedence over and above a now emerging District plan which has been emerging since 2014 and included this site without local consultation after the Neighbourhood Plan was made. Not to deliver 35% affordable housing will mean large sections of the community in the curtilage of Buckingham and surrounding villages will be socially and financially disadvantaged to the profit and benefit of the developer leaving the local authority to cover the social and economical effects of that development being approved with the lower affordable housing number.

Taking these matters above into consideration as the local member I think it is absolutely necessary for the development committee to have a site meeting before making any decisions negative or positive on this application without clear sight of the way this development can be integrated into a settled community when it stands in isolation, adjacent to an Industrial Park with no means of forming itself into a community such as a social meeting point apart from a handful of playgrounds.

6. Environmental considerations of the development/concerns questions and prejudices, I am also concerned whether this development prejudices the well-being of the dormice which inhabit it which are a protected species. Legislation suggests that you cannot re-locate or mitigate the habitats for a protected species. There are legal precedents where developments have had to move further away from the habitat of a protected species because domestic cats from the development have used the wildlife and habitat as a food source and extinguished the protected species. Therefore I ask that the committee consider whether it has taken consideration of article 6 of the Habitat Directive ruling of the European Court of Justice in regards to protected species. In addition to this has full consideration been taken of the implications of article 12 of the Habitat Directive which was agreed in 2005/2006 these matters must be considered in respect to the local dormice. In addition, I seek advice that the officers have considered guidance documents on the protection of animal species of a community interest under the Habitats Directive 92/43/EEC.

I'm also seeking assurance the NPPF policy conserving the natural environment published in March 2012 has been considered in relation to the possible implications to a protected species.

I'm also seeking understanding that the Law Commission Wildlife Law Volume 1 report was cited and discussed in advance of consideration or recommendation of this application (passed into law in 1965, and ordered by the House of Commons to be printed on the 9th of November 2015, and is available thanks to the Law Commissioner the Right Honourable Lord Justice Bean).

I have attached links to all relevant legislation below, and would seek to understand that all the implications, ramifications, directives, advice and protections have been considered before recommendations or determination of this application has been agreed, to see for sure that a protected species adjacent to the community of Buckingham is not prejudiced, resulting in its extinction through development contrary to the ambitions of a local neighbourhood plan.

**Councillor Ralph** – land is outside the settlement boundary and area designated for housing in the Neighbourhood Plan; apart from modest open space, there are no community facilities such as shop or community centre; residents will have little option except to use car and new crossing on A421 will delay traffic; loss of employment opportunities and inappropriate location for housing which will become a dormitory. (A member at the time of making the comments)

**Councillor Howard Mordue** – does not fit in with local plan, increased density of residential and commercial traffic unsustainable, outside the current planned growth of the town.

**Councillor Charlie Clare** – well outside envelope of Buckingham, beyond existing industrial park, should remain independent from Gawcott. Drain on local infrastructure and poorly connected.

**Greg Smith MP** - I am writing to object to planning application 19/00148/AOP - Address: Land Off Osier Way, East Of Gawcott Road And South Of Buckingham Ring Road.

I am relaying the concerns of my constituents who have contacted me about this application. My constituent's primary objections are:

- 1, The development falls outside of the Buckingham Neighbourhood Plan
- 2, Buckingham does not have the infrastructure to support the continuing development
- 3, Additional traffic in the town is unsustainable
- 4, More green space lost

#### Parish/Town Council Comments

#### ***Original comments:***

**Buckingham Town Council (BTC)** oppose the applications on the following principal grounds:



# BUCKINGHAM TOWN COUNCIL

TOWN COUNCIL OFFICES, BUCKINGHAM CENTRE,  
VERNEY CLOSE, BUCKINGHAM. MK18 1JP

Telephone/Fax: (01280) 816 426

Email: [townclerk@buckingham-tc.gov.uk](mailto:townclerk@buckingham-tc.gov.uk)  
[www.buckingham-tc.gov.uk](http://www.buckingham-tc.gov.uk)

Town Clerk: Mr. P. Hodson



## MAJOR PLANNING APPLICATION

19/00148/AOP

## OPPOSE & ATTEND

Land Off Osier Way South Of A421 And East Of Gawcott Road

Outline Planning Application (with all matters other than means of access reserved) for a residential development of up to 420 dwellings (including affordable housing), and associated infrastructure including provision of open space (including formal playspace); car parking; new pedestrian and cycle linkages; landscaping and drainage works (to include SuDS attenuation) and two new accesses off Osier Way and one new access off Gawcott Road. Includes demolition of the existing pigsty.

Members noted that at the date of validation of this application, the ruling local plan was the Buckingham Neighbourhood Plan, therefore

1. This application site is outside the settlement boundary, and not a designated site, contrary to Policy HP1. The Secretary of State had already upheld this policy in the matter of Moreton Road Phase III (14/02601/AOP) in July 2017.
2. Should the application nevertheless be approved, the proportion of Affordable Housing should be 35%, not the submitted 25% contrary to policy HP5. This meant a difference of 42 Affordable dwellings. Mention was also made of the DGLG figure (3686 in March 2018, quoted in the *Buckingham & Winslow Advertiser* of 1<sup>st</sup> February 2019) for households on the waiting list in the Vale which showed a clear need for a higher %;
3. Connectivity with the town had not been demonstrated, particularly with respect to the schools. Lace Hill, Bourton Meadow and George Grenville were all an unfeasible walking distance for young children, and the result would be an exacerbation of the parent-car problem already very evident at all three schools;
4. Using the VALP figure of 1.5 working residents per dwelling gives a figure of 630 people seeking employment. Buckingham does not have this number of vacancies so a sizeable number of vehicles out-commuting will be generated at peak times; the applicants appear to think that all can be accommodated in the Industrial Park and thus walk or cycle to work. Members point out that the only employment development is to be at Silverstone and Westcott, neither of which are accessible by public transport or a safe cycleway; there is no cycle shop or repair service in Buckingham.
5. The complete lack - on AVDC's instruction - of any communal facilities other than play areas will reinforce the isolation of this dormitory estate beyond the industrial area and the bypass; there will be no opportunity to build a community spirit or integrate it with the town in the way that has proven successful at Lace Hill (which has a primary school and sport/leisure centre for 700 dwellings). Taken together with the 382 dwellings approved for the adjacent site diagonally across the Gawcott Road roundabout a total of 800 dwellings in this quadrant of the town will have no community meeting place, no facilities other than the Aldi store and no school within walking distance. It should be noted that the school in Gawcott is for juniors only, its infants department is in Tingewick.
6. The smaller (eastern) housing area is even more isolated, having only a footpath connection to the larger site and a single access on to a rough road; concern was



- expressed that a single access point was unsafe, in the event of – say – a fire or chemical spill at the factory opposite; an emergency access should be included.
7. Members (and the County Council) do not favour Shared Surface Streets; they are unsafe for pedestrians, children and the visually and physically disabled; if the refuse lorries cannot use them, bins get left out to reduce the hauling distance to the collection point, and they require more maintenance than conventional surfaces.
  8. Water supply is inadequate, sewage capacity not mentioned (in the Utilities document) and concern was expressed that the small attenuation ponds might not be adequate for the amount of stormwater run-off, to the detriment of the wildlife dependent on the water courses, both on-site and downstream.
  9. Planning Notices had not yet been posted at the site.

Signed.....*K. M. Liffatt*..... Dated.....*6/2/19*.....



## Additional comments re: further information submitted in 2021:



# BUCKINGHAM TOWN COUNCIL

TOWN COUNCIL OFFICES, BUCKINGHAM CENTRE,  
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Town Clerk: Mr. P. Hodson



Interim Council 28<sup>th</sup> June 2021

### Amended Plans

#### 19/00148/AOP

#### OPPOSE (no change)

Land off Osier Way, East of Gawcott Road and South of Buckingham Ring Road  
Outline Planning Application (with all matters other than means of access reserved) for a residential development of up to 420 dwellings (including affordable housing), and associated infrastructure including provision of open space (including formal playspace); car parking; new pedestrian and cycle linkages; landscaping and drainage works (to include SuDS attenuation), two new accesses off Osier Way and one new access off Gawcott Road. Includes demolition of the existing pigsty.

*Wates Developments Ltd*

Recently added documents:

- Amended Illustrative Master Plan
- (2<sup>nd</sup>) Response from from the Ecology Officer
- (2<sup>nd</sup>) Response from Parks and Recreation
- An updated Design & Access Statement
- LVIA addendum
- Landscape Plan
- Updated Arboricultural Impact Assessment & Tree Protection Plan
- A Habitat Impact Assessment Calculator, a multi-coloured spreadsheet rating the different habitats on the site
- A note accompanying this from BSG Ecology describing the current revision of the mitigation strategy with a clear map attached
- A File Note with a table of Emerging Policy Requirements for Open Space and Green Infrastructure
- A map accompanying this

At a meeting of the Full Council held on 28<sup>th</sup> June 2021, Members discussed the new documents and received a report on the consultee reports added to the website document list since their last review of the application in February 2019.

It was noted that many of the consultee requests for additional information had not been addressed in the intervening two years apart from the two new drawings and associated documents. The 'update' to the D&A Statement amounted to little more than changing the date on the front cover, the incorporation of the new Ecology and Open Space drawings and a slightly more artistic treatment of the landscaping on some of the Character Area pages. The statement on p25 about the emerging VALP had not been altered even though clearly incorrect.

Concern was expressed at the sites chosen for the site notices: none in a place where a pedestrian might see them, still less a nearby resident, and thus emphasising the location of the proposed development as separate from the town.

The Town Council noted that Buckinghamshire still has a lengthy Housing List and these houses would help to resolve this, but new housing must be supported by adequate infrastructure and so voted to continue to Oppose this application on the following ground:

- The site is not an allocated site in the Buckingham Neighbourhood Development Plan, which is currently the controlling document, and the proposal does not accord with BNDP Policy HP1.



@BuckinghamTC

Twinned with Mouvaux, France;



Neukirchen-Vluyn, Germany

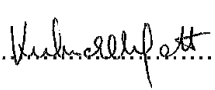


And in addition

- The site is not allocated for housing in the Buckingham Neighbourhood Plan for good reason: it is outside the settlement boundary and separated from the rest of the town and its amenities by a Business Park, an Industrial Park and the very busy A421 bypass;
- It has no provision on which to build a community other than a few play spaces;
- All the local schools are close to capacity; none of the primary schools are within a small child's walking distance, which will lead to car use and further congestion outside the existing schools, which already have a parent-parking problem. Young children have to be delivered into the care of an adult on the school staff, which can take 10-15 minutes. The secondary schools are also a good distance from the estate and struggling to accommodate children from the existing new housing;
- It is an extraordinary assumption that the existing employment areas to the east of the development have some 600 jobs available for the new residents, allowing travel to work by cycle or on foot; and VALP includes only two Employment Development Areas, neither of which are accessible by public transport from Buckingham, which will increase car use on country lanes unsuitable for such additional traffic at peak hours;
- Situating such a large development on top of a hill and so far from any amenities, schools and employment opportunities and thus almost totally dependent on car travel, is contrary to good town planning and detrimental to the longterm aims of improving the environment;
- It was noted that, despite considerable efforts to accommodate the extra traffic necessarily associated with 420 houses, the Highways Officer still had concerns about the effect on the bypass roundabouts (not to mention yet another pedestrian crossing);
- There is no proof that Stagecoach will agree to an extra stop to serve the estate – the X5 is by definition an Express service – and there is no other stop on the bypass on its entire length; the Embleton Way service (two a day, Monday – Friday, plus an extra one on Tuesdays) is not well timed for access to work or school;
- Following the recent serious flooding in December, serious concern was expressed at the capacity of the water supply/sewers/drains to cope with this much housing and related hard landscaping;
- This Council, and the LPA concurs, disapproves of Shared Surface streets.

Should the LPA be minded to approve this application, this Council strongly urges

1. That as the estate will be considered as part of Buckingham, the Affordable Housing will be 35% of the total, per the Neighbourhood Plan;
2. That the Buckingham Transport Strategy be reinstated as a policy to be adhered to for all new developments especially those that directly affect the existing bypass;
3. That an Education Strategy for Buckingham be formulated; noting that few of the primary schools have room to expand, and the senior schools would have to lose playing field space to do so, and that the south-west quarter of the town – with almost 400 new houses at St. Rumbolds Fields being built plus these 420 proposed in addition to the existing population – has no school within walking distance;
4. That the Town Council and Gawcott PC be consulted on the terms of the s106 from initial draft stage.
5. That the Town Council and Gawcott PC be permitted to speak when the application comes before the Committee.

Signed...  ...

Date... 2/7/21 ...

*Twinned with Mouvaux, France*

## **Gawcott with Lenborough Parish Council - OPPOSE the application for the reasons stated**

Parish Councillors considered this application at the meeting on 14<sup>th</sup> February 2019 and made the following observations:

1. The development straddles the parish boundaries between Buckingham Town and Gawcott with Lenborough with approximately 120 homes proposed within Gawcott Parish. Some concern was expressed about the need to ensure that Buckingham and Gawcott retain their individual identities by ensuring a green buffer between the two communities.
2. Parish Councillors, having been provided with the observations of Buckingham Town Councillors, supported the view that the adopted Buckingham Neighbourhood Plan [BNP] should be regarded as the relevant document for the assessment of this application. **On the basis that the application does not comply with the BNP, it should be rejected.**
3. Councillors observed that yet again when considering large developments in and near Parish boundaries, there is no visibility of strategic planning for infrastructure improvement to accommodate the demands of an increasing population. There has apparently been no consultation by County or District Councils with affected parishes around Buckingham about transport, health, education and utility improvements and so it is assumed that the administrators in Aylesbury expect existing facilities to accommodate the increased demand on services to the detriment of present residents as well as quality of services for newcomers. **In the absence of assurances that the application will be sustainably supported by infrastructure improvements, the application should be rejected.**
4. Great concern was expressed about the traffic implications for Buckingham. The A421 is regularly brought to a standstill at peak times and this development together with the approved scheme at Tingewick Road with another 400 homes, will bring a further increase in vehicle movements. An additional and necessary pedestrian crossing is proposed across the A421, but this will cause a further impediment to the free flow of traffic and increase the number of such impediments in the form of roundabouts and crossings to 12 between the Tingewick Road new roundabout and the Lace Hill development on the A413.
5. Councillors know that this development would result in an increase in vehicles through Gawcott, in addition to those associated with the HS2 and East West Rail projects. Parish Councillors wish to see an overall strategic transport plan which will integrate with the Expressway. The plan must prioritise the removal of through HGV and large vehicle traffic from the A421 around Buckingham with weight restrictions imposed upon rural link roads to keep unsuitably large vehicles off Village streets. Without an overall transport infrastructure strategy not only will the quality of life for Buckingham residents be compromised, but also will the economic well-being of businesses based in Buckingham which rely on reliable transport links.
6. Councillors are very disappointed that the Bucks County Council strategic highways officers have not been in touch with the Parish to discuss Councillors' views on access arrangements for this development onto Gawcott Road [which must be via a mini-roundabout] and the speed limit and other highway changes which increased traffic volumes would require. It is Councillors on the ground who have the day to day knowledge which the highway engineers do not see unless they observe what is happening locally and listen to Parish Councillors. **Without a full scheme of road and speed limit improvements agreed with Parish**

**Councillors [rather than unilaterally by those in Aylesbury], the application should be rejected.**

7. Councillors observed that no local consultations have taken place about the education needs of the families of new residents. Roundwood School Gawcott and Lace Hill School are approximately equidistant from the proposed development. Whilst there would appear to be expansion space at Lace Hill, the Roundwood site in Gawcott could not expand without investment in additional land to accommodate more buildings. Furthermore, this is a junior site and the infant site is at Tingewick, another two miles distant. The distance on foot from the development to all local schools, will result in an increase in the already chaotic traffic problems for Buckingham when schools gather in the morning and pupils leave in the afternoon. **Without proper consideration of the education needs of new residents and assurances about adequate capacity for existing pupils, this application should be rejected.**
8. Councillors noted that there are concerns raised by utility suppliers about the capacity of the sewage treatment works [a well-known issue in Buckingham] and water supplies. It is assumed that in the consideration of this development, utility suppliers will be required to guarantee that capacity is/would be available to accommodate increases in demand from this further residential development. **Without assurances from utility suppliers about adequacy and future capacity of supply and facilities, this application should be rejected.**
9. Concern was expressed that there has been no dialogue with Aylesbury Vale planners about community and leisure facilities within the development and the increased usage of Gawcott Parish facilities which would occur as a result. Additional investment would be required to accommodate the increased usage of facilities which are presently provided for Gawcott Parish residents from Parish funds.
10. Councillors found it difficult to assess the detail and form of the proposed residential units from the small scale layout plans. It was observed that if it is proposed to place higher than two storey buildings at the Gawcott Road entrance to the scheme, this would meet with strong objections from Parish Councillors. Such buildings would be totally out of keeping on this rural approach to Buckingham. The apparent proposal to provide Shared Surface Streets would also be rejected.
11. Parish Councillors are firmly of the view that the social housing within the scheme [whatever the percentage agreed] must be allocated to local people requiring accommodation rather than to 'all comers' from anywhere in the District. The shortage of social and affordable rural housing in North Buckinghamshire is particularly acute and so the housing in new developments must be allocated to families in this immediate area.
12. Councillors shared the concerns of Buckingham Councillors about the lack of connectivity of this development with the rest of the Town. **It was observed that this highlighted the inappropriate location of the development and on this basis the application should be rejected.**

**In conclusion, Councillors felt that the application failed to meet the principles set down in the National Planning Policy Framework. The three dimensions of sustainable development being economic, social and environmental roles are not sufficiently demonstrated as being met in this application and accordingly Councillors are of the view that the application must be rejected.**

### **Further comments following amendments / additional documents (June 2021):**

Gawcott with Lenborough Parish Council **OPPOSE** the application and together with Buckingham Town Council would wish to address the Planning Committee at a Committee hearing.

Parish Councillors considered the revised information relating to this application and made the following observations in addition to those previously registered on 19th February 2019:

1. Parish Councillors support the view that the adopted Buckingham Neighbourhood Plan [BNP] should be regarded as the relevant document for the assessment of this application. The site of the proposed development is not allocated in the BNP and so the application should be rejected.

2. Parish Councillors observed that when considering large developments in and near Parish boundaries, there is no visibility of strategic planning for infrastructure improvement to accommodate the demands of an increasing population. There has been no consultation by the County planners with this Parish about transport, health, education and utility capacity and so Councillors assume existing facilities are expected to accommodate the increased demand on services to the detriment of present residents as well as the quality of services for newcomers. In the absence of assurances that the application will be sustainably supported by these infrastructure improvements, the application should be rejected.

3. Great concern was expressed about the traffic implications for Buckingham. The A421 is regularly brought to a standstill at peak times and this 420 home development together with the scheme at St Rumbolds Fields with another 400 homes, will bring a further increase in vehicle movements. The applicants propose a pedestrian crossing for the A421, but this will cause a further impediment to the free flow of traffic and increase the number of such impediments in the form of roundabouts and crossings to 12 between the Tingewick Road new roundabout and the Lace Hill development on the A413. These delays to vehicles passing through Buckingham will have the effect of increased rat-running through villages and the Town Centre by drivers seeking to avoid the lengthening queues.

4. Councillors shared the concerns of Buckingham Town Councillors about the lack of connectivity of this development with the rest of the Town. It was observed that this highlighted the inappropriate location of the development to the south of the A421 and on this basis the application should be rejected.

5. Councillors know that this development would result in an increase in vehicles through Gawcott, in addition to those associated with the HS2 and East West Rail projects. A detailed plan to ameliorate the effect of increased traffic is required, to include calming, speed restrictions, rat-running impediments and a weight restriction to keep out all but essential HGVs. In the absence of a full scheme of road and speed limit improvements agreed with Town and Parish Councillors [rather than unilaterally by those in Aylesbury], the application should be rejected.

6. Councillors observed that no local consultations have taken place about the education requirements of residents in the catchment of Roundwood School, Gawcott. Roundwood and Lace Hill Schools are approximately equidistant from the proposed development. Whilst there would appear to be expansion space at Lace Hill, the Roundwood site in Gawcott could not expand without investment in additional land to accommodate more buildings. Furthermore, this is a junior site and the infant site is at Tingewick, another two miles distant. The distance on foot from the development

to all local schools, will result in an increase in the already chaotic traffic problems for Buckingham when schools gather in the morning and pupils leave in the afternoon. Without proper consideration of the education needs of new residents and assurances about adequate capacity for existing pupils, this application should be rejected.

7. Councillors noted that there are concerns raised by utility suppliers about the capacity of the sewage treatment works, surface water drainage and water supplies. It is assumed that utility suppliers have been consulted and guaranteed that capacity is/would be available to accommodate increases in demand from this further residential development. Without assurances from utility suppliers about adequacy and future capacity of supply and facilities, this application should be rejected.

8. Concern was expressed that there has been no dialogue about community and leisure facilities within the development and the increased usage of Gawcott Parish facilities which would occur as a result. Additional investment would be required to accommodate the increased usage of facilities which are presently provided for Gawcott residents from Parish funds.

9. Parish Councillors are firmly of the view that the social housing within the scheme [whatever the percentage agreed] must be allocated to local people requiring accommodation rather than to all comers. The shortage of social and affordable rural housing in North Buckinghamshire is particularly acute and so the housing in new developments must be allocated to families in this immediate area.

In summary, Councillors are unanimous that the application fails on the sustainability principles set down in the National Planning Policy Framework. The economic, social and environmental dimensions laid out in the Framework are not adequately met in this application and accordingly Councillors strongly recommend that the application be rejected.

Should the Planning Committee be minded to approve this application despite the advice, and against the recommendations of, the Buckingham Town and Gawcott with Lenborough Council, the Parish Council joins with the Town Council in strongly urging:

- That as the development is located largely within the Buckingham Town Council area, the principles set down in the BNP should apply in relation to affordable housing;
- That the policies set down in the Buckingham Transport Strategy should apply to this development as it places immediate and further pressure on the ring road junctions;
- That the applicants be required to plan for a pedestrian bridge over the A421 to provide a more direct and efficient, safer and useable link from this peripheral site to the Buckingham town centre, schools and services;
- That an Education Strategy for Buckingham and surrounding villages be urgently produced in consultation with the relevant Councils, taking account of the near-to-capacity of existing schools, none of which are within easy walking distance of the development;
- That both Buckingham Town and Gawcott with Lenborough Councils be consulted on the terms of s106 and other development agreements from the initial draft stages.

## **CONSULTATION RESPONSES**

### **EXTERNAL**

**Environment Agency** – *note that part of the application site lies within Flood Zones 2&3 defined by the NPPF and associated guidance as having a medium & high probability of flooding. The submitted FRA confirms satisfactorily that all built development will be located outside the area at risk of flooding, therefore proposal satisfies NPPF and flood risk to the site and surrounding area will not increase, subject to the imposition of a condition to ensure that the development is carried out in accordance with the FRA and the mitigation measures within it, without which the proposal would pose an unacceptable flood risk.*

*Further advice to the authority – in accordance with the NPPF the development should not be permitted unless it has been demonstrated that the sequential test has been satisfied. ???*

**Anglian Water** – Buckingham Water Recycling Centre does not currently have capacity but this will be provided if planning permission is granted; various consents are required and appropriate informatives should be added to any decision notice granted. To include need for consultation with regard to potential flooding issues.

**Buckingham and River Ouzel Internal Drainage Board** – site is outside the Boards district, therefore no comments.

**Buckinghamshire Healthcare NHS Trust** – a number of separate responses and supporting documents have been submitted. The CCG are aware of proposals for increased housing in the area and developments such as this need to allow for sustainable innovation and integrated health provision and future patients must be properly supported with adequate health provision. A flexible approach to S106 provision is requested so that adequate GP health provision can be provided and the drive towards integrated health facilities to accommodate the new model of care.

The Trust contends that the population and household increase associated with this proposed development will significantly impact on the service delivery and performance of the Trust and thus an adverse effect on their ability to provide on time care delivery within the local area. It is explained that current funding is negotiated on a yearly basis and not dependant on the LPAs housing land supply, housing need or housing projections. There is also a 'gap' before the funding becomes available such that there is an impact from the new residents before any related funding is provided.

It has therefore provided a detailed request for contributions based on the costs of operating their existing services (A&E, acute & surgical care, planned care, secondary care, tertiary care and other support services) over a 12 month period to fund the 'gap' . It is a per person 'cost' based on the overall costs of that service related to the number and frequency of persons likely to need to use the services, itself based on average admissions. In summary, a total contribution of £791,650.

The NHS Trust believes that the supporting documents (appeals and legal opinion) demonstrate that the contributions sought are CIL compliant. They conclude that without securing such contributions, the Trust would be unable to support the proposals and would therefore object. It is stressed that the contribution would be used directly to provide additional healthcare to serve the residents of the development, and that the level of contribution is fairly and reasonably related in scale and kind. The contribution is required prior to / at implementation to ensure that the necessary provision is put in place in a timely manner.

## ***INTERNAL***

**LLFA (SuDS)** – in summary, no objection subject to conditions.

Since original comments, the FRA and design details have been updated and amended; an updated assessment of flood hazards will be required at detailed design stage. A series of flood mitigation measures are included such as raised finished floor levels, raising crests, and an increase in culvert size. Further ground investigations will also be required to include mitigation measure in the event of groundwater emergence.

The overall drainage strategy includes indicative detention basins and swales, and a detailed assessment of site levels and accessibility will be required; use of permeable paving, and/or bio-retention area and rain gardens within communal areas is encouraged. The design principles for the detention basins and swales should be carried forward, with 10m buffer for nature and access.

Conditions to require the submission and approval of a detailed surface water drainage scheme and a demonstration & verification that it has been built as approved are recommended. Details of the whole-life maintenance plan should be secured vis S106.

**Highway Authority** – there has been a number of consultation responses from the HA and negotiations have been held with the applicant's consultants since the application was first submitted. The concerns have centred around issues of connectivity / sustainable transport options, effect on existing parking in Osier Way, safety of proposed access points, methodology used for the traffic modelling, including consideration of cumulative impacts and in light of the Strategic Model for Buckingham, and mitigation for off-site junction impacts.

***Comments on further information provided following above (dated May 2021) –***

Junction impacts - it was found that the revised assessments (as required by the HA) showed that all three affected junctions on the A421 operated over capacity in 2022 with significant impacts also observed on minor arms. The mitigation measures proposed for A421/Gawcott Road and A421/Osier Way/Embleton Road in the form of increased flare lengths and entry widths on minor arms showed improvement and were therefore acceptable. Further detailed consideration was given to the A421/London Road roundabout as initially proposed options for mitigation appeared to simply displace problems of queueing to other arms, particularly the eastern arm. Therefore, in view of the aims of the Transport Strategy to encourage the use of the ring road to alleviate traffic



congestion in the town centre, it was suggested that the impacts should be mitigated more strategically by a contribution towards the Buckingham Transport Strategy (BTS).

Public Transport – the existing bus stops on Embleton Way and London Road are in excess of the recommended walking distance of 400m. The Council’s Passenger Transport Section advise that bus stop facilities should be provided within 250-400m of all dwellings and the applicant has provided details of potential sites for two bus stops with laybys on the A421 for an additional X5 stop and potential for expansion of the 131/132 service covering the site, Mount Pleasant, Tingewick Road and potentially Gawcott. To facilitate this the internal spine road will be designed with minimum carriageway of 6m. An annual contribution for 5 years would also be required to fund a new bus service, allow for extension of existing service or provide community transport.

Pedestrian / cycle access – a new 3m wide shared footway / cycleway to connect with the Osier Way footway which will also be widened is proposed; a new toucan crossing facility on the A421 close to the junction of Embleton Way and new 3m shared footway/cycleway to link to the existing footway. The extension of the existing footway along Gawcott Road to link to the site access is also proposed.

Vehicular Access – the accesses onto Osier Way have been amended to take on board previous concerns; the main access becoming the priority with Osier Way to the east becoming the minor arm. The design for the secondary Osier Way access has now been amended to show suitable vision splays. With regard to the Gawcott Road access, a gateway feature just to the south is proposed and from this point the speed limit will need to be reduced to 30mph.

Travel Plan – the original plan did not include reference to some important elements but these can be sought at the detailed stage.

*A summary of the S106 obligation requirements is as follows:*

- **A Full Travel Plan** – to be submitted and agreed by the Local Planning Authority following consultation with the Local Highway Authority to be in general accordance with “Buckinghamshire Council Sustainable Travel Plans Guidelines for Developers”. The approved Travel Plan shall be implemented prior to occupation of the proposed development.
- **Travel Plan review fee** - £5,000 towards the auditing of the travel plan (£1,000 per annum for a minimum period of five years).
- **Public Transport Contribution** – Five year developer contribution with the annual cost being £100,000 would be required to fund a new bus service and / or bus service interchange and allow for the extension of the existing service and / or provision of Community Transport.
- **Contribution towards the Buckingham Transport Strategy** – A contribution of £840,000 towards the funding of elements of the strategy.
- **Traffic Regulation Order** – £15,000 towards a TRO for the relocation of the speed limit transition point to 30mph south of the proposed site access on Gawcott Road and for double yellow lines around the turning head of the proposed new primary Osier Way/site access staggered junction.
- **Highway Works Delivery Plan** – To secure the following off-site highway works:

## Pedestrian and Cycle access

- A footway connection at the proposed Gawcott Road access as shown in principle on drawing number ITB11061-GA-007C.
- A 3.0m wide shared footway/cycleway on the northern side of the access road of the proposed Osier Way primary access, crossing Swan Business Park and continuing further along Osier Way to the north by widening of the existing footway, thereby connecting Osier Way to the A421 as shown in principle on drawing number ITB11061-GA-013B.
- Provision of a 2.0m wide footway on the southern side of the access road of the proposed Osier Way primary access to be continued south on Osier Way and including uncontrolled crossing points on Osier way as shown in principle on drawing number ITB11061-GA- 013B.
- Provision of an uncontrolled dropped tactile crossing on the Swan Business Park arm of the proposed new primary Osier Way access roundabout to provide a continual 3.0m wide shared footway/cycleway to the Osier Way north arm of the proposed new primary Osier Way access roundabout. The provision of a dropped tactile crossing to tie in with the existing footway network north of the Swan Business Park arm as shown in in principle on drawing number ITB11061-GA-013
- Provision of layby for vehicle parking for the Swan Business Park. The inclusion of double yellow lines around the turning head of this junction to prevent parking as shown in principle on drawing number ITB11061-GA-019A.
- Provision of a 2.0m wide footway on either side of the proposed secondary access on Osier Way as shown in principle on drawing number ITB11061-GA-009 Rev C.
- Provision of a 2.0m wide footway on both sides of the access road to connect with Gawcott Road at the proposed Gawcott Road access. Provision of new 2.0m wide footway north of the access on the eastern side of Gawcott Road, to connect with existing footway network. Provision of a gateway feature to the south of the Gawcott Road access along with road markings such as dragons' teeth and coloured speed roundels to encourage slower speeds on approach to the junction with the A421, all as shown in principle on drawing number ITB11061-GA-007C.
- A new controlled Toucan Crossing to the east of the A421 / Gawcott Road / Embleton Way roundabout, along with improvements to the informal crossing points on the western side of the junction and a footway connection on the southern side of the junction to connect to Gawcott Road as shown in principle on drawing number ITB11061-GA-011.

## Public Transport

- Provision of a pair of new bus stops on the A421 along the site frontage as shown in principle on drawing number ITB11061-GA- 20, to also include Bus Shelters and RTPi.

## **Junctions**

### **A421/Gawcott Road**

- Delivery of Toucan crossing and other proposed improvements for the Gawcott Road/A421/Embleton Way roundabout as shown in principle on Drawing ITB11061-GA-028.

- Improvement works on the Embleton Way (Gawcott Road north arm) in the form of widening from 7.27m to 8.9m and increase in flare length from 11.2m to 11.5m as shown in principle on drawing number ITB11061-GA-029.
- Improvement works on the Gawcott Road south arm in the form of widening from 7.27m to 8.4m and increase in flare length from 8.7m to 14.3m as shown in principle on drawing number ITB11061-GA- 029.

#### **A421/Osier Way**

- Widening of the A421 western arm from 7.27m to 10.8m to create an additional approach lane and associated merge on A421 east as shown in principle on the Drawing no ITB11061-GA-030.
- Improvement works on the Embleton Way by increasing the entry width from 6.78m to 8.4m and increase in flare length from 18.7m to 20.3m with island amendments as shown in principle on drawing number ITB11061-GA-031.
- Improvement works on the Osier Way arm which include increasing the entry width from 7.41m to 9.3m and increasing the flare length from 12.9m to 16.8m as shown in principle on drawing number ITB11061-GA-031.

It should be noted that all highway works are subject to detailed design, including Stage 1 and Stage 2 Road Safety Audit. Unless otherwise agreed by the County Council, each Highway Agreement shall be subject to the following requirements:

- Payment of a bond, cash deposit, surety or other form of guarantee or security in respect of the works;
- Payment of the County Council's legal costs in preparing and setting the Highway Agreement;
- Payment of the County Council's engineers' fees in the administration and inspection of the works that are subject to the Highway Agreement;
- Payment of any costs associated with new or amended Traffic Regulation Orders and commuted sums for further maintenance of adoptable highway items

#### **Conditions will also be required to deal with the following:**

- Full details of access construction details to be approved
- Access ways and visibility splays along Osier Way / Gawcott Road to be provided before other development commences
- Full details of adoptable estate roads, to include provision of main spine road to accommodate buses, to be constructed prior to occupation of units which they serve
- To require details of parking, garaging and manoeuvring to be provided with RM
- To require the submission and approval of a Construction Traffic Management Plan prior to commencement

**Affordable Housing** – the Buckingham Neighbourhood Plan requires a minimum of 35% affordable housing; therefore, expect to see at least 147 affordable housing units. The applicant should liaise with the Buckingham Town Council regarding the status of the Community Land Trust. AH units

should be reflective of the overall needs of the district – there is currently a greater need for 2b / 4p and 3b/5&6p houses, slightly less for 1 and 4 beds. Tenure mix should be 75% rented and 25% shared ownership (2 then 3 bed houses preferred). Units should be accessible and adaptable to comply with emerging policy and be in line with the Nationally Described Space Standards and be indistinguishable from the market units. Clusters of no more than 15 dwellings or 18 if including flats should be provided. An affordable housing plan will be required and no more than 50% of the market units should be occupied before the AH units have been completed and transferred to a Housing Association.

**Landscape & Urban Design** - The proposal would alter the landscape character of the baseline plot from open countryside to housing, this change would be irreversible and significant for the site and the surrounding landscape. The site allocation boundary leads to the subdivision of an existing greenfield, introducing an urban character on this rural edge, despite mitigation. The development would further increase the developed urban edge of Buckingham in addition to the industrial/commercial buildings. The proposed development in combination with the existing commercial development would further erode the existing rural character at the periphery of the town, which would irreversibly alter the landscape character in this area. The development proposal extends built form south past the existing settlement boundary into the open countryside. There is a risk that this development would appear separate and nucleated from the existing residential areas. In visual impact terms, whilst the rolling topography of the site and surrounding landscape and mature vegetation will visually contain the site and development to a degree, there will be visual impacts from Gawcott Road and from some PRoWs to the south. There will also be some nighttime effects.

*The LVIA is noted in particular that there will be high impacts on the local landscape and an adverse change in visual impact terms. These impacts will not be fully mitigated in respect of landscape character. A further assessment is needed to ensure appropriate mitigation of any lighting impacts.*

*The elements of the illustrative masterplan are welcomed; but concern with regard to the location of the NEAP in terms of natural surveillance and consideration should be given to the incorporation of additional areas of open space with the built development such as pocket parks and inclusion of 'edible' landscapes as well as SUDS features as appropriate.*

In summary, the development proposal will alter the appearance and character of the base line site and its setting. The supporting LVIA identifies the high adverse impact on landscape character and visual amenity as a result of the proposed development.

On this basis, I would recommend that the landscape and visual harms identified should carry proportionate negative weight against the scheme in any consideration of the planning balance of the proposed development.

If successful at outline, progressing to detail design I would like to see a design code come forward in advance of a reserved matters masterplan. The design code should be agreed early in the design process so that it can meaningfully inform the layout and design of the development.

**Ecology** (original comments March 2019) – the scheme does not deliver biodiversity net gain (BNG) and therefore needs to be reconsidered. Further consideration with regard to farmland birds, the importance of the dormouse population and impact of the scheme are requested.

**Comments on further information received** – the application is supported by an updated Habitat Impact assessment and a revised Ecological Mitigation strategy from the ecological consultant BSG Ecology dated June 2021. The measures detailed in these two documents outline the ecological enhancement measures required in site post development to establish a Biodiversity Net Gain (BNG) in line with current and emerging local & national planning policy. The measures to deal with the dormouse population are in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended).

The enhancement measures detailed in the June 2021 BSG documents will need to be secured with a Landscape & Ecological Management Plan (LEMP) condition if this application is approved. Further to this, the measures detailed in the initial Ecological Appraisal from BSG dated November 2020 will also require a planning condition to ensure the mitigation and compensation elements are established on site.

**Trees** – No objection - Further information required at reserved matters stage.

Due to the outline nature of the application, and the uncertainty arising from the age of the tree survey data, it is not possible to accurately assess the likely significance of impacts to trees. However, although revised information would be extremely useful at this time, I do not consider that the arboricultural concerns would constitute a reason for refusal at this stage. Beyond the age of the survey data, the majority of the concerns are intrinsic to the technical design stage, and all are potentially resolvable.

Further, it is clear that consideration has been given to existing trees and the constraints they may pose, and that there is significant scope for new planting. Therefore it is possible to state with confidence that the proposal is feasible without significant detriment to the tree stock – subject to appropriate mitigation and continued consideration of trees throughout the design process.

Accordingly, should the balance be in favour, it would be appropriate to attach conditions to any permission to secure a full AIA of the individual phases and full details of new planting to include information to demonstrate that there is sufficient space to the trees to achieve full growth potential.

**Recycling / Waste** – no details provided at this stage; refer developer to advisory note.

**Archaeology** – concur with applicant’s assessment which concludes that there are archaeological features that could potentially be affected by the development; therefore, there is potential for harm and suitable conditions are required to secure appropriate investigation, recording, publication and archiving to conform with NPPF paragraph 199.

**Parks & Recreation – (*original comments*)** – fails to provide for required on-site sport and leisure provision for a development of this size in Buckingham which should include open space, equipped play facilities, youth shelter and MUGA. In accordance with the Ready Reckoner a full contribution will also be required to off-site facilities; in addition a bond to ensure the delivery of the on-site scheme will be required.

**Comments on amended plans** – the revised POS Strategy plan (2662-LA-05 Rev. P1) demonstrates that the minimum open space and equipped play facilities can be provided on site in accordance with VALP policy I1. A sport and leisure contribution will be required in accordance with Ready Reckoner (VALP policies I1, I2 & I3) towards facilities not provided on site.

The LEAPs and NEAPs must adhere to guidance related to buffer distance, areas and play value assessment score.

**Education** – a financial contribution towards existing primary, secondary and special schools provision would be required to mitigate the impact of the development. Schools in the area are currently at close to or at capacity and there are plans to expand the existing school to accommodate the increased demand from housing growth. (Details of the contribution amounts required per dwelling are set out).

**Environmental Health** – no objection subject to the imposition of a condition to secure a detailed scheme of mitigation against noise from adjoining commercial units.

Contamination - The applicant’s report suggested a number of further actions (targeted soil testing, gas monitoring, asbestos survey of dilapidated building, investigation to locate former well, remediation method statement to include verification plan with regard to any ground gas protection measures, elevated metals and asbestos identified and discovery strategy such than any abnormal conditions are identified, the impact assessed, and any necessary mitigation measures secured.

## **REPRESENTATIONS**

### **Amenity Societies/Residents Associations**

The Buckingham Society has several objections – the A421 has been poorly maintained and will require significant improvement; insufficient local employment; poorly connected to existing facilities, new footways and cycleways are needed; insufficient affordable housing; loss of farmland birds; Design Code needed; no equipped play areas of public open space indicated; together with other planned developments, there is a need for a new primary school this side of the town and secondary schools are also at full capacity.

### **Other Representations**

61 representations have been received objecting to the original proposal which in summary are on the following grounds:

#### *Original:*

- Rear boundaries of adjoining properties vulnerable
- Traffic data only provided for a single day and traffic data used in assessments appears too low
- Significant increase in traffic along roads that have yet to experience full impact of adjoining / nearby developments
- Access onto Gawcott Road would be particularly harmful as this is a small country road and would not relieve traffic levels on main A421
- Increased traffic to local schools in particular
- Insufficient local education and health care provision
- Adverse impact on the natural environment / blot on countryside
- These new developments lack character and area unaffordable unless shared ownership
- SuDS calculations need to take into account drains piped under Gawcott Fields
- Existing trees along boundary with adjoining residential properties should be retained with similar treatment as at Tingewick Park; suitable treatment for this boundary is needed
- Outside settlement boundary and would lead to joining up with Gawcott village
- No need for another 420 houses
- Serious effects on health and wellbeing
- Adverse pollution effects during construction and in future, inconvenience to local residents
- Loss of grade 2 and 3a agricultural land and impact on right to roam
- Permanent loss of ecology, trees and hedgerows
- Adverse impact on views approaching from Gawcott
- Adverse impact on character of town
- Hydrology of the area will be adversely affected
- The adverse impacts related to large scale dormitory migration are significant, and will result in increased car journeys
- Similar development in Maids Moreton turned down by planning Inspectorate
- Schools not within walking distance
- The site will remain isolated from the town and have lack of community cohesion
- The traffic generated will use Gawcott village to avoid congestion on A421
- Additional pedestrian crossings will impede flows on the A421

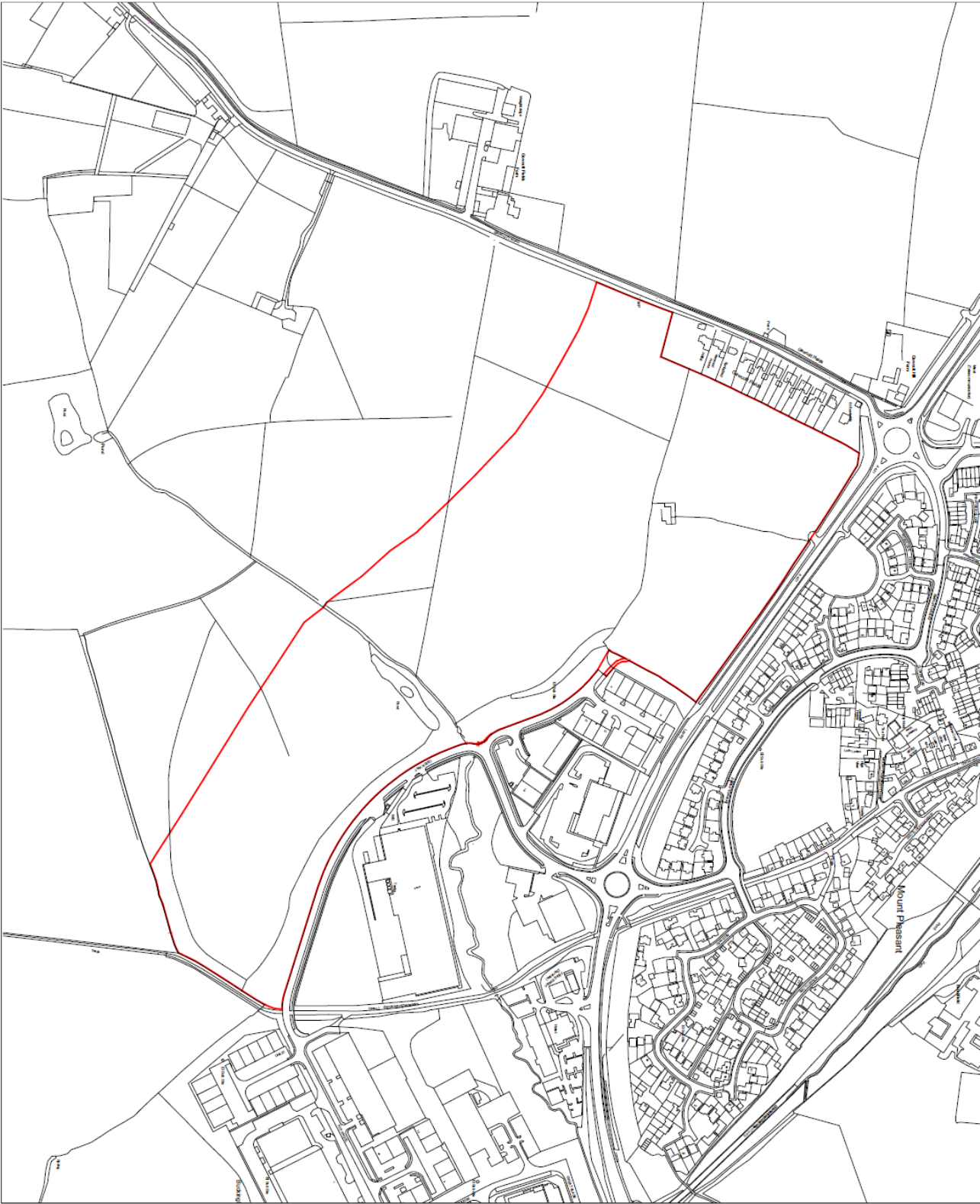
- Dwellings higher than two storey out of keeping with countryside edge / views from Gawcott Road
- Policy principles of NPPF / VALP / BNP not met
- 

*In response to the amended plans & additional information submitted in 2021, a further 28 objections were received, noting the following:*

- Site has previously been rejected through the neighbourhood plan process; site is in the wrong place
- It is disconnected from the town centre and its services and amenities
- Necessary infrastructure not in place
- That site is in emerging VALP being used to support the application
- Security issues
- Contrary to HP1 as not one of the designated sites in the neighbourhood plan, is outside the settlement boundary,
- Not sustainable in terms of infrastructure, connectivity, employment , education, drainage, sewage, noise, and impact on local ecology
- Local roads already over capacity, development permitted at Tingewick Road and HS2 traffic have all added recently to traffic levels; the priority junction proposed onto Gawcott Road is unsafe inevitably leading to accidents – should be a roundabout
- Lack of community services
- No plans to extend nearest schools, pupils will have to be taken to school in cars
- Lack of sufficient local employment
- Sewage treatment capacity inadequate
- Air quality concerns
- Open space adjacent to residential dwellings would leave boundaries vulnerable to unauthorised access
- Inadequate boundary treatment for adjacent properties and adverse effect on light and privacy due to proximity of 3 storey dwellings
-



**APPENDIX B: Site Location Plan**



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## Report to Strategic Sites Planning Committee

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<b>Application Number:</b>	PL/20/3280/OA
<b>Proposal:</b>	Outline planning permission with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq ft (70,000 sq m) comprising: <ul style="list-style-type: none"><li>- A visitor attraction of 350,000 sq ft comprising a series of buildings</li><li>- 350,000 sq ft of film production buildings (including sound stages, workshops, offices and an external film backlot)</li><li>- Education and business hub (50,000 sq ft)</li><li>- Associated parking and servicing</li><li>- Green Infrastructure</li></ul>
<b>Site Location:</b>	Land South of Pinewood Studios, Pinewood Road, Iver Heath, Buckinghamshire SL0 0NH
<b>Applicant:</b>	Pinewood South Limited
<b>Case Officer:</b>	John Fannon
<b>Ward(s) affected:</b>	Iver
<b>Parish-Town Council:</b>	Iver Parish Council
<b>Date valid application received:</b>	1 October 2020
<b>Statutory determination date:</b>	7 January 2022
<b>Recommendation</b>	That the application is delegated to the Director of Planning and Environment for <b>APPROVAL</b> subject to: referral to the Secretary of State to consider whether to call-in the planning application on Green Belt grounds; and, the recommended planning conditions and the satisfactory completion of an agreement under s106 of the Town and Country Planning Act (as amended) in relation to the Planning Obligations broadly in accordance with the details set out in the main body of the report or if a satisfactory S106 Agreement cannot be completed, for the application to be refused for such reasons as the Director of Planning and Environment considers appropriate.

## 1.0 Summary & Recommendation

### The Planning Application

- 1.1 The application seeks Outline planning permission, with all matters reserved except for principal means of access, for the Screen Hub UK (SHUK) scheme. The proposed development comprises three elements: a Visitor Attraction (The Pinewood Studios Experience); Film Production Studios (expansion of the existing Film Studios); and Education and Business Growth hubs (Centre Stage). This would be an extension to the cluster of film-related uses based at Pinewood Studios with links to other screen based uses in Buckinghamshire and beyond.
- 1.2 The site to the west of Iver Heath is approximately 33ha in area and located to the south of the existing studios, west of Pinewood Road and east of Black Park Country Park. It extends southwards to Uxbridge Road (A412). The former quarry site is in the process of being restored to agricultural use and comprises a number of open fields.

### Planning Issues

#### *Green Belt Very Special Circumstances*

- 1.3 The proposed development would constitute inappropriate development in the Green Belt and will result in substantial spatial and visual harm to the openness of the Green Belt. In addition, the proposals will lead to a conflict with three out of the five purposes of including land in the Green Belt. This harm is attributed substantial weight. Paragraph 147 of the National Planning Policy Framework ('the NPPF') states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'Very Special Circumstances' (VSC). As a result, it is necessary to establish whether there are any 'Very Special Circumstances'. The NPPF 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.
- 1.4 Harm includes the harm arising from inappropriate development in the Green Belt and the impact on openness and conflict with the purposes of the Green Belt which attracts substantial weight; the harm to the landscape that is afforded moderate weight; the less than substantial harm to the setting of the heritage asset, Little Coppice to which great weight is afforded; the harm to residential amenity, and air pollution which are all attributed limited weight; and, and loss of BMV agricultural land is afforded very limited weight. There are a number of factors which are neutral.
- 1.5 The benefits centre on the national significance of what is proposed in terms of developing the strengths of Pinewood Studios in UK film production and delivering a complimentary nationally significant visitor attraction, both delivering a significant economic benefit. The proposals take advantage of the global asset and anchor institution of Pinewood, realising significant benefits to the national, regional and local economy. The expansion of studio space meeting demand will aid local, regional and national recovery. The visitor attraction will significantly boost tourism and aid the visitor economy in the county and region. The benefits are very significant and clearly align with local and national economic growth and recovery strategies. These are attributed very significant weight. The proposed Screen Hub UK is considered to be strongly related to the specific Pinewood site/location. This is attributed significant positive weight. The contribution to culture and the arts is attributed

significant weight. Environmental benefits to BGN is afforded limited weight and community benefits are afforded very limited weight.

- 1.6 In considering the Green Belt balance and setting out all of the harms on one side and all of the benefits and other material considerations on the other side of the balance, officers have concluded that all of the harms are clearly outweighed by the benefits. 'Very Special Circumstances' do exist in this case.

#### *The Listed Building*

- 1.7 Special regard has been given to the desirability of preserving the setting of nearby listed buildings and the conclusion is that the proposal would amount to 'less than substantial harm' at the lower end of the spectrum to the significance of Little Coppice to which great weight is given under paragraph 199 of the NPPF. There would be public benefits in relation to the economic, social, community and environmental benefits as set out above. The view of officers is that the potential public benefits of the scheme set out above would very significantly outweigh the harm identified to the setting of the heritage asset.

#### *Other matters*

- 1.8 The proposal complies with the policy and other objectives of the NPPF relating to trees and hedgerows, parking and access, sustainable transport, cycling and walking, permissive footpaths, meeting the challenges of climate change and flooding, conserving and enhancing the natural environment, archaeology, well designed places and design, contamination, air quality and residential amenities.

#### *Planning balance*

- 1.9 In considering the very special circumstances balance, officers have concluded that all of the harms are clearly outweighed by the benefits. 'Very Special Circumstances' do exist in this case. It is considered that other material considerations substantially outweigh the conflict with the development plan. Had it been appropriate to apply the tilted balance, there would have been no clear reason for refusal on this ground under paragraph 11(d)(i) of the NPPF. In consequence officers have concluded that, subject to the recommended conditions and the completion of a section 106 agreement securing the necessary obligations that planning permission should be granted.

#### *Consideration by Strategic Planning Committee*

- 1.10 Officers consider that given the nature and scale of the development and issues it raises it would be appropriate for this application to be reported to committee. This application falls within the Terms of Reference of the Strategic Sites Committee. It is also noted that Cllr Griffin has requested that the application be considered by Committee.

#### **Recommendation**

- 1.11 That the application is delegated to the Director of Planning and Environment for APPROVAL subject to: referral to the Secretary of State to consider whether to call-in the planning application on Green Belt grounds; and, the recommended planning conditions and the satisfactory completion of an agreement under s106 of the Town and Country Planning Act (as amended) in relation to the Planning Obligations broadly in accordance with the details set out in the main body of the report or if a

satisfactory S106 Agreement cannot be completed, for the application to be refused for such reasons as the Director of Planning and Environment considers appropriate.

## **2.0 Description of Site and Proposed Development**

### *Site and Context*

- 2.1 The site to the west of Iver Heath is 32.6ha and located to the south of the existing studios, west of Pinewood Road and east of Black Park Country Park. It extends southwards to Uxbridge Road (A412). The land comprises a number of open fields, which have been the subject of quarrying and subsequent land fill.
- 2.2 The boundaries of the site are marked principally by hedgerows and trees. This has been supplemented by bunding in some locations associated with the storage of topsoil during the working of the quarry. Along the boundary to Pinewood Road, there are several agricultural field gates. The boundary to Uxbridge Road is marked by a wooden rail fence with some larger trees and hedgerow intermittently along its edge, and a single existing field access.
- 2.3 The site is predominantly flat, save for some large temporary earth mounds which are a direct result of the mineral extraction and which are being used to backfill and restore the land. These will be removed as the restoration is being completed, with levels being aligned with those that are currently present on site to the north and south.
- 2.4 The site sits immediately to the south of the existing Pinewood Studios, with part of the site overlapping into the studio estate. This overlapping area includes a number of existing workshop structures, which will be retained. Along the boundary with the application site there is a large backlot (known as Paddock Lot), a number of workshops buildings and an area of car parking. There is currently a permissive footpath (The Peace Path) that runs along the southern edge of the existing studios and through the northern part of the site.
- 2.5 The site abuts a number of residential properties on Pinewood Road. Part of the northern boundary of the site abuts the curtilage of Park Lodge Farmhouse, a residential property with generous grounds. The existing Park / Royal Lodge effectively divides the site in 2, leaving a narrow connecting neck between the two parts to the rear of the lodge towards the Black Park boundary. The site surrounds this property on three sides. Firtree Cottage is located on Pinewood Road within the site's redline boundary. This will be retained.
- 2.6 The roads bounding the site are the A412, a dual carriageway and Pinewood Road, a single carriageway connecting Five Points Roundabout (FPR) with villages to the north including Fulmer and Gerrards Cross. Pinewood Road provides access to Pinewood Studios.
- 2.7 Pinewood Studios, to the north of the application site, including Pinewood West and Pinewood East are accessed from Pinewood Road and provide a range of production facilities including sound stages, workshops, post production facilities and backlots.
- 2.8 To the west, Black Park Country Park is a 500 acre site including woodland, heathland and open space. The park area immediately adjoining the application site comprises woodland with formal paths.

### *Proposed development*

- 2.9 The development comprises three elements which, in order of scale, are: a Visitor Attraction (The Pinewood Studios Experience); Film Production Studios (expansion of the existing Film Studios); and, an Education and Business Growth hub (known as Centre Stage). This would be an extension to the cluster of film-related uses based at Pinewood Studios, with links to other screen based uses in Buckinghamshire and beyond.
- 2.10 It is stated that the overall Screen Hub UK development concept takes the existing strategic economic asset of Pinewood Studios as a foundation and proposes an expansion of its role and scale to deliver an integrated screen/film-inspired growth hub at the heart of the Buckinghamshire and West London creative clusters. The growth hub is intended to provide links between content producers/providers and the wider business, education/skills and cultural networks in support of growth of the creative and digital sector.
- 2.11 The description of development is as follows:
- “Outline planning application with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq ft (70,000 sq m) comprising:
- A visitor attraction of 350,000 sq ft comprising a series of buildings
  - 350,000 sq ft of film production buildings (including sound stages, workshops, offices and an external film backlot)
  - An education and business growth hub (50,000 sq ft)
  - Associated parking and servicing
  - Green Infrastructure”
- 2.12 The application Parameter Plans are:
- PP1A Site context 3770-FB-XX-00-DR-A-01-120 Rev P1  
PP1B Site context 3770-FB-XX-00-DR-A-01-121 Rev P1  
PP2 Development zones 3770-FB-XX-00-DR-A-01-122 Rev P2  
PP3A Land use 3770-FB-XX-00-DR-A-01-123 Rev P3  
PP3B Land Use 3770-FB-XX-00-DR-A-01-124 Rev P3  
PP4 Green infrastructure 3770-FB-XX-00-DR-A-01-125 Rev P3  
PP5 Access and movements 3770-FB-XX-00-DR-A-01-126 Rev P1  
PP6A Building heights 3770-FB-XX-00-DR-A-01-127 Rev P2  
PP6B Building heights 3770-FB-XX-00-DR-A-01-128 Rev P2  
PP7 Development numbers and yield 3770-FB-XX-00-SC-A-01-000 Rev P3
- 2.13 The principal points of access plans are:
- A412 access - ITL16184-GA-002D
  - Pinewood Road accesses ITL16184-GA-007B, ITL16184-GA-005B and ITL16184-GA-006B

### *Visitor Attraction*

- 2.14 The visitor attraction development zone is on the southern larger portion of the site, with two access points from Pinewood Road and one from the A412 Uxbridge Road. The parameter plans allow for two layout options. Option A has the buildings located towards the western part of the site with a movement zone (parking and roadways) surrounding to the south and east. Option B has the Buildings located across the width of the site with the movement zone (parking and roadways) located to the south of the building zone.
- 2.15 The visitor attraction will comprise one or more individual or interconnected main buildings (up to 10), together with smaller scale structures to accommodate related support / service facilities. The parameters allows for buildings up to 21.5 m high and with provision of 1,400 car parking spaces.

### *Film Studios*

- 2.16 The film production studios zone is on the northern portion of the site with an access point from Pinewood Road. The production space (buildings and backlot) are located towards the western part of the site with a movement zone (parking and roadways) to the east, closest to Pinewood Road. The production studio will be a series of buildings of different forms as required by the needs of film production. In addition to the identified floorspace, there will be an area of backlot for external filming. The parameter plans allow for buildings up to 21.5 m high and with provision of 715 car parking spaces.
- 2.17 An area to the rear of Park Lodge / Royal Lodge is proposed as shared / joint zone or a flexible use area for either visitor attraction or production studios or joint use.

### *Centre Stage*

- 2.18 The education and business growth hub (Centre Stage) would be located within the production studio movement zone close to Pinewood. This will be one or more individual or interconnected buildings (up to 5 main structures) sited within the movement zone adjacent to Pinewood Road. The parameters allow for buildings up to 14.5 m high and with provision of 226 car parking spaces.
- 2.19 Centre Stage could also accommodate co-working space, community use (discretionary shared use of building(s) at the facility subject to availability) and a screening theatre. It is explained that Pinewood would facilitate the definition and delivery of the hubs but they are not planned as part of the commercial development, and will not be funded by Pinewood, apart from making the land available. It is not clear on what basis/tenure the land would be offered to a third party.

### *Green Infrastructure*

- 2.20 A minimum of 10.7 ha of the application site will comprise Green Infrastructure (GI) and the parameter plan defines the proposed areas, which are principally contiguous with the site's boundaries. The green infrastructure within the parameters will accommodate access routes. Boundary landscaping will generally be between 10m and 30m in depth (subject to detailed design and reserved matters approvals).
- 2.21 The Amended Parameter Plans PP7 provide (development numbers as set out in the table below.



Element	Area ha (acres)	Floorspace (Sq m)	Parking	Notes
<b>Site (Full)</b>	32.6 (80.5)	Existing buildings – 4,873 New – 67,354 Total – 72,227	Cars – 2,341 Coach / bus – 25 Cycle - 269	
<b>Visitor Attraction</b>	Building (Option A) – 5.4 (13.3) (Option B) - 6.1 (15)  Movement (Option A) – 6.5 (16) (Option B) – 5.9 (14.6)	New – 32,516	Cars – 1,400 Coach / bus – 25 Cycle - 70	Maximum attendance figures 5,000 non peak day 6,500 mid peak day 8,500 peak day
<b>Production Studio</b>	9.8 ha (24.2) Building – 7.3 (18) Movement – 2.5 (6.2)	Existing Buildings – 4,873 New Buildings – 32,516	Cars – 715 Cycle - 150	The production studio building area will include a backlot of c2ha
<b>Education and Business Hubs</b>		New – 4,645 (50,000 sqft)	Cars – 226 Cycle - 49	
<b>Green Infrastructure</b>	10.7 (26.5)			Black Park buffer – up to 30m wide Amenity buffer – up to 25 m wide

2.22 A permissive footpath, The Peace Path that runs along the southern edge of the existing studio connecting Pinewood Road with Black Park, is to be re-provided in a different location to the south of the site as a consequence of the development.

2.23 In terms of designing to reduce crime, it is noted that the development will be a secure site with no general public access apart from along the route of the relocated Peace Path.

2.24 The application included an Environmental Statement (ES) as required under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. 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. A series of technical chapters within the ES consider the range of environmental factors. The ES contains the following chapters addressing each of the following topics:

- Consideration of Alternatives
- Socio Economics and Human Health
- Landscape and Visual
- Biodiversity
- Transport
- Climate Change
- Air Quality
- Noise and Vibration
- Cumulative Effects Assessment

2.25 An Addendum to the ES was submitted in October 2021. The Addendum is considered alongside the originally submitted ES within this report.

*Very Special Circumstances*

2.26 On the basis that the proposals constitute inappropriate development within the Green Belt, the application submission identifies material considerations which would comprise very special circumstances to justify a grant of planning permission. These considerations are:

1. The geographically fixed location of Pinewood Studios (there is not a choice of location)
2. The implementation of Government/LEP approved Industrial Strategy
3. The economic benefits in support of economic recovery predominantly new employment, retraining/reskilling, growth of the local economy, tourism boost
4. The environmental benefits, predominantly a significant gain in ecological asset and biodiversity and furtherance of Colne Valley Park objectives
5. The social/community benefits, opportunity for shared facilities and extensions to permissive path network
6. The enhancement of arts, culture and tourism

*Community Engagement and Public Consultation:*

2.27 The applicant has submitted a Consultation Statement summarising details of a programme of stakeholder engagement undertaken in September 2020, prior to the submission of the outline planning application.

2.28 It is reported that over 300 people were engaged through activities carried out, which included:

- A series of 9 virtual briefings with key local stakeholders, residents, studios staff and tenants.

- Launching of a project website, including details of the scheme and feedback facilities.
- Issuing of a press release to local, national and international news outlets.
- Sharing of project details on social media.

2.29 This advises that the feedback has enabled the project team to build an understanding of the local context and knowledge of what the local community's concerns and aspirations are relating to Screen Hub UK.

2.30 A number of pre application meetings with the Local Planning Authority preceded the application submission.

### 3.0 Relevant Planning History

3.1 The majority of the site was most recently a quarry which has been restored to agricultural land. The northern part of the site including the Peace Path is within the existing Pinewood (West) Studios site.

#### *Park Lodge Quarry, Pinewood Road – Most recent consents*

3.2 CM/34/17 Variation to condition 1 of planning permission CM/38/16 to provide for the continuation of mineral extraction and processing and site restoration until 31 October 2017, with the exception of Phase 11 which is to be restored by 31 December 2020. Conditional Permission August 2017.

3.3 CM/33/17 Variation to condition 2 of planning permission CM/37/16 to provide for the continuation of mineral extraction and processing and site restoration until 31 October 2017, with the exception of Phase 11 which is to be restored by 31 December 2020. Conditional Permission August 2017.

3.4 CM/32/17 Variation to condition 1 of planning permission CM/36/16 to provide for the continuation of mineral extraction and processing and site restoration until 31 October 2017, with the exception of Phase 11 which is to be restored by 31 December 2020. Conditional Permission August 2017.

3.5 CM/35/17 Variation of condition 1 of planning permission CM/39/16 to provide for the continuation of mineral extraction and processing and site restoration until 31 October 2017, with the exception of Phase 11 which is to be restored by 31 December 2020. August 2017.

#### *Pinewood Studios*

3.6 13/00175/OUT (Refused, and Appeal Allowed by the Secretary of State, June 2014) Reconfiguration and expansion of facilities for screen based media, including film, television and video games, and associated services and industries, comprising: demolition of outdated accommodation; erection of new stages, workshops, office accommodation, demountable modular buildings, entrance structures and reception and security offices, gas CHP energy centre, underground waste water treatment plant, recycling facilities, backlots and film streetscapes, external film production; creation of new vehicular and pedestrian access from Pinewood Road, emergency access from Sevenhills Road, access roads within the site, surface and multi-level car parking; and associated landscaping and ecological habitat creation works.( In respect

of access, full approval is sought for the means of vehicular access from Pinewood Road and (for emergency use) from Sevenhills Road. All other aspects of access are to be reserved). The whole proposal (including the works at the Five Points Roundabout) is described as the Pinewood Studios Development Framework (known as PSDF) by the Applicant, Pinewood Studios Limited (PSL). A copy of the appeal decision is attached.

- 3.7 The northern part of the site which is included within the red line boundary for this application is identified as backlot within application 13/00175/OUT where temporary structures are permitted. A number of structures have been erected in this location.
- 3.8 13/00176/FUL Highway improvements to the Five Points roundabout. Conditional Permission July 2013. Consent expired, unimplemented.
- 3.9 14/01992/REM Application for approval of first reserved matters comprising details required by conditions 2, 11, 12 and 14 of outline planning permission 13/00175/OUT, including details of sound stages, offices, workshops and associated infrastructure, landscaping and other works.
- 3.10 17/00744/REM Approval of Reserved Matters for Phase Two comprising details of sound stages, offices, workshops, ancillary building and associated infrastructure, landscaping and other works (following Outline Application 13/00175/OUT).

*Standalone Planning Consents (some of which are within the PSDF red line but differ from the parameter plans)*

- 3.11 PL/19/3794/FA North Dock Demolition of existing buildings and the erection of a replacement building comprising two sound stages on the North Dock Site. Conditional Permission March 2020.
- 3.12 PL/19/3858/FA Plot 1.04 Demolition of existing building and replacement with a single sound stage. Conditional Permission March 2020.
- 3.13 PL/19/3932/FA Plot 1.03 Demolition of existing buildings and replacement with 2 sound stages on Plot 1.03. Conditional Permission April 2020.
- 3.14 PL/20/3179/FA Construction of 4 sound stages and a workshop building on PSDF development zone 4 and 4a at Pinewood Studios, Iver Heath. Conditional Permission March 2021.
- 3.15 PL/21/4074/FA Enlargement, improvement and signalisation of the Five Points Roundabout and its approaches. Pending determination.
- 3.16 PL/19/4430/FA Realignment, resurfacing and improvement works, with associated landscaping and engineering works to Sevenhills Road, Iver Heath. Additional vehicular access to Pinewood Studios site. Conditional Permission August 2021. In order to mitigate the impacts arising from development granted under application reference 13/00175/OUT for the Pinewood Studios Development Framework (PSDF) a number of highways/traffic improvements were required and secured by S106 agreement including works to Five Points Roundabout. The works to Sevenhills Road were proposed as an acceptable alternative to the Five Points Roundabout Scheme. As part of the Sevenhills Road consent the legal agreement for the PSDF was varied to allow the applicant to decide which improvement works to provide – either Five Points Roundabout or Sevenhills Road. The applicant has confirmed that the Five

Points Roundabout works will be implemented to mitigate the impacts of the PSDF.

#### **4.0 Summary of Representations**

- 4.1 The application was subject to the relevant consultation, notification and publicity. An initial round of consultation was undertaken in Autumn 2020 and a second round of consultation in Autumn 2021.
- 4.2 In response to the initial round of consultation over 210 individual letters of objection from the local community and letters from other bodies have been received. Approximately 185 comments of support have also been received.
- 4.3 In response to the second round of consultation approximately 33 comments of objection and 2 comments of support were received.
- 4.4 The most frequently mentioned concerns/benefits are summarised at Appendix A of the Committee Report.
- 4.5 Support: The grounds of support include the beneficial effects, culturally, economically, to education, job creation and training opportunities, as well as contributing to tourism and reinforcing the global reputation of the UK in TV/film production.
- 4.6 Objection: The grounds of objection include the urbanising effect on character of area, harm to the Green Belt, highways impacts and congestion, impact on residential amenity, environmental concerns, the Peace Path location, and failure to deliver local jobs.
- 4.7 All representations received from statutory consultees, non-statutory consultees and other interested individuals, groups and organisations are also set out in Appendix A of the Committee Report.

#### **5.0 Statutory Duties, Policy & Guidance**

##### *Statutory Duties*

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004) 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 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.

##### *The Development Plan:*

- 5.3 The adopted development plan comprises the saved policies of the South Bucks District Local Plan (adopted 1999, consolidated 2007 and 2011), South Bucks Core Strategy (2011), Buckinghamshire Minerals and Waste Local Plan (2019).
- 5.4 The Local Plan policies relevant to the proposals include:
  - Policy GB1 Green Belt
  - Policy GB4 - Employment Generating and Commercial Development in the Green Belt (excluding Green Belt Settlements)

Policy L10 Trees covered by TPO  
Policy EP3 Use, design and layout of development  
Policy EP4 Landscaping  
Policy EP5 Sunlight and daylight  
Policy EP6 Designing to reduce crime  
Policy T4 New built development to provide tourist facilities  
Policy E2 Pinewood Studios  
Policy TR4 Provision for those with special needs  
Policy TR5 Accesses, Highway Works and Traffic generation  
Policy TR7 Parking provision

5.5 The Core Strategy sets out the Spatial strategy which aims to protect the Green Belt by focussing new development on previously developed land within existing settlements. The policies relevant to the proposals include:

Core Policy 6 Local infrastructure needs  
Core Policy 7 Accessibility and transport  
Core Policy 8 Built and historic environment  
Core Policy 9 Natural environment  
Core Policy 10 Employment  
Core Policy 12 Sustainable energy  
Core Policy 13 Environmental and resource management

5.6 The site is a former quarry and subject to restoration. Minerals and Waste plan policies relevant to the proposals include:

Policy 25: Delivering high quality restoration and aftercare  
Policy 27: Minimising Land Use Conflict.

#### *Guidance other Material Considerations*

5.7 Key policy and guidance documents include:

- Landscape Capacity Assessment for Green Belt Development Options in the emerging Chiltern and South Bucks Local Plan November 2017
- Chiltern and South Bucks Townscape Character Study 2017
- South Bucks District Landscape Character Assessment 2011
- Chiltern and South Bucks Community Infrastructure Levy (CIL) Charging Schedule (2020)
- Chiltern District Council Sustainable Construction and Renewable Energy SPD (2015)
- Local Transport Plan: Buckinghamshire Local Transport Plan 4, (April 2016)
- Chiltern and South Bucks Economic Development Strategy (August 2017).
- Burnham Beeches SAC Strategic Access Management and Monitoring (SAMMS) SPD 2020
- Colne Valley Regional Park objectives.

5.8 Other key material considerations:

- National Planning Policy Framework (2021) (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide (2019)

*Withdrawn Chiltern and South Bucks Local Plan (2020)*

- 5.9 On 21 October 2020 Buckinghamshire Council resolved to withdraw the Chiltern and South Bucks Local Plan 2036. There is currently no set timetable for the preparation of a new local plan although the Council has stated its intention to have a Buckinghamshire-wide local plan in place by April 2025.

## **6.0 Principle and Location of Development, Green Belt**

Local Plan Saved Policies:

Policy GB1 Green Belt Boundaries and Control of Development in the Green Belt

Policy GB4 - Employment Generating and Commercial Development in the Green Belt (excluding Green Belt Settlements)

- 6.1 The site lies in the Green Belt. Saved Local Plan policy GB1 states that most development in the Green Belt is inappropriate. There is a general presumption against inappropriate development. The policy then goes on to set out categories of development (a – h) in Green Belt that would not be considered to be inappropriate. The proposed development is not captured within any of these exceptions. It is therefore contrary to this policy.
- 6.2 The level of consistency between Policy GB1 and the NPPF is sufficient to enable the saved policy to continue to be given weight. Although policy GB1 sets out the categories of development that are inappropriate, these do not correspond entirely with those in the Framework and there is no reference to very special circumstances. Paragraph 219 of the NPPF 2021 states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF. As such moderate weight is afforded to Policy GB1 itself although substantial weight must be accorded to the protection of the Green Belt from inappropriate development as required by the NPPF.
- 6.3 Local Plan policy GB4 states that proposals to establish new employment generating or other commercial sites or extend the curtilages of existing sites will not be permitted in the Green Belt. Where the proposal involves the re-use of buildings in the Green Belt new employment generating development may be acceptable subject to the provisions of Policy GB2 (Re-use of Buildings in the Green Belt). Extensions or additional buildings for existing employment generating or other commercial development will not be permitted in the Green Belt, unless, in the case of extensions, they are in connection with the re-use of buildings subject to Policy GB2 (Re-use of Buildings in the Green Belt). Although policy GB4 sets out the categories relating to employment development that are inappropriate, these do not correspond entirely with those in the Framework and there is no reference to very special circumstances. As such moderate weight is afforded to Policy GB4 although substantial weight must be accorded to the protection of the Green Belt from inappropriate development as required by the NPPF.
- 6.4 The Government attaches great importance to Green Belts. NPPF paragraph 137 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 6.5 Paragraph 138 of the NPPF 2021 sets out that Green Belt serves the following five purposes:
- (a) to check the unrestricted sprawl of large built up areas;

- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns: and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 6.6 NPPF paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 confirms that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.7 The NPPF states that that development should be regarded as inappropriate in the Green Belt except in specified exceptions as set out in Paragraph 149 (a – g). The proposed development does not fall within any of the exceptions (a – g) listed in paragraph 149. The proposals are therefore inappropriate development based on this paragraph of the NPPF.
- 6.8 As the proposed development amounts to inappropriate development within the Green Belt the applicant has provided a case for very special circumstances. This is considered in detail at section 20 in this report.
- 6.9 The factors that can be taken into account when assessing the impact of a proposal on the openness of the Green Belt may include the spatial and visual aspects of the development (NPPG update June 2021, 001 Ref ID: 64-001-20190722). This is considered further below.
- 6.10 Background documents to the withdrawn Local Plan include analyses which help inform the assessment of the impact on openness. As part of that evidence it was determined that insufficient land outside the Green Belt was available to meet identified housing and economic development needs. Therefore, the Councils undertook a Green Belt review in two parts. The first was countywide and this recommended that a number of areas be further considered for Green Belt release. These areas were selected for further consideration because they least met the purposes of including land in the Green Belt. The second part of the Green Belt review focused on those areas in Chiltern and South Bucks which had been recommended for further assessment. While the local plan has been withdrawn and carries no weight, the evidence base can be considered material where relevant although the weight to be accorded to it must reflect the fact that it was not tested at examination.

*Spatial aspects - Green Belt Assessment 2016 and 2018*

- 6.11 The Green Belt Assessment 2016 Buckinghamshire Green Belt Assessment Report: Methodology and Assessment of General Areas 242378-4-05 Issue 7 March 2016, in considering the area in which the site is located (General Area 74), identified 2 sites suitable for release, RSA 23 (land to the north of Pinewood Green where Pinewood East is located) and RSA 24 (land to the east of Pinewood Road, adjoining Pinewood Green to the south) and otherwise concluded that in general Area 74, should not be considered for any further release, because it was deemed to be important to the strategic integrity of the Green Belt in the wider area.



- 6.12 The Stage 2 Green Belt Assessment 2018 (Chiltern & South Bucks Stage 2 Green Belt Assessment Strategic Role of the Metropolitan Green Belt in Chiltern & South Bucks 2018) provides further evidence around the broader strategic roles of different areas of Green Belt noting in particular that the South Bucks area has a fragmented Green Belt and faces significant development pressures from the south and the east.
- 6.13 The site lies within Strategic Zone A – London Fringe, this Zone is characterised by relatively narrow bands of Green Belt between settlements. Overall, while varying in degree of openness and the prevalence of built form, Strategic Area A forms a strategic arc of open spaces separating the large built-up areas of Greater London and Slough, and smaller settlements such as Iver, and Iver Heath, and contributes to maintaining the existing settlement pattern. The study notes that ‘West of the M25, managed open spaces such as Richings Park Golf Course and Bangors Park are interspersed with contained employment uses, such as Ditton Park or Pinewood Studios at Iver.’
- 6.14 From the assessment undertaken it can be concluded that the application site is found to contribute to Green Belt purposes in an area vulnerable to development pressure.
- 6.15 The proposed development is on a site of over 32 ha. The proposed buildings to provide up to 70,000 sq m in floor area will occupy approximately 13 ha and c2,300 parking spaces will occupy approximately 9 ha. This is a large scale development within the Green Belt that will result in a significant impact on openness. This impact would be substantial given the scale and extent of built form and the land take involved. There will therefore be harm to the spatial role of openness, as a large area of existing open land would be removed from the Green Belt, which would be a permanent loss of openness.

#### *Visual aspects - LVIA*

- 6.16 The site is a former quarry that is in the process of being brought back to open agricultural fields. The open character and restored agricultural fields provide the setting to the adjacent Black Park. This is experienced in views across the sites from the east where the heavily wooded Black Park is the backdrop with open fields in the foreground, and in views out over the restored open ground from Black Park’s eastern boundary, views that add significantly to the feel and quality of this part of the park. The scale of development in this location given the land take involved and with the significant built form proposed, hardstanding, areas of car parking, associated highways infrastructure and structural landscaping proposed will have a detrimental impact by very significantly reducing the openness of the countryside/Green Belt in this location.
- 6.17 A Landscape and Visual Impact Assessment has been undertaken as part of the Environmental Impact Assessment (EIA). This reports the outcome of the assessment of likely significant environmental effects including significant adverse effects arising from the proposed development in relation to landscape and visual amenity. This is addressed at section 9 of this report below.

#### *Green Belt purposes*

- 6.18 The Green Belt purposes are listed in para. 138 of the NPPF. These are considered in turn below.
- a) To check the unrestricted sprawl of large built up areas

- 6.19 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays a strong role in meeting the Purpose. 'Overall, while the Green Belt is fragmented in places, it plays a strong role both in the south of the Strategic Zone by preventing the sprawl of Slough and Greater London (Uxbridge / West Drayton) and preventing the sprawl of built-up areas in the north (Rickmansworth, Gerrards Cross / Chalfont St Peter) and further east towards Watford.' The proposal would clearly result in a sprawl of development which would fill in what is effectively a gap between the existing extent of the Pinewood studios site and the Uxbridge Road to the south, but as the site does not abut 'large built up areas', there is no clear conflict with this purpose.
- b) To prevent neighbouring towns merging into one another
- 6.20 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays a strong role in meeting the Purpose. 'While the east-west merging of settlements is the key risk the Green Belt in this Strategic Zone acts to prevent, it also plays a role in preventing the north-south merging of smaller settlements, including Rickmansworth and Maple Cross, Iver and Iver Heath, and South Harefield and Harefield, by protecting essential gaps between them.'
- 6.21 Iver Heath is an urban break in the Green Belt approximately 2km from Uxbridge and Slough. The scale and extent of the development represents an expansion of the urban development on the edge of Iver Heath and will result in north-south merging of development across the Uxbridge Road. The village of Fulmer lies a distance to the north west of the existing Pinewood development, this gap would not be eroded. The development to the south of Pinewood would not result in a perception of merging Iver Heath with Fulmer.
- 6.22 The applicant's case is that as the containment provided by Black Park to the west and by the existing Pinewood Studios to the north, limits the erosion of the gap between settlements concluding that there is limited harm to this Green belt purpose, and officers agree with this conclusion.
- 6.23 It is considered that there is some conflict but the proposal will result in only limited harm to this Green Belt purpose
- c) To assist in safeguarding the countryside from encroachment
- 6.24 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays a moderate role in meeting the Purpose. The proposed development will result in significant physical encroachment into the open countryside and the loss of 32 ha of land restored to agricultural use. The harm to this purpose is therefore apparent. Given the open character of the site and the contrasting setting this provides to the adjacent densely wooded Black Park, the harm is considered very significant.
- d) To preserve the setting and special character of historic towns
- 6.25 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays no role in meeting the Purpose. As the site is not within proximity to a historic town there is no conflict with this purpose.
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 6.26 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays a strong role in meeting the Purpose as there are a significant number of settlements enclosed by, or abutting, the Green Belt within this Zone. 'Within Chiltern and South

Bucks Districts, the 2017 SHLAA7 shows some limited opportunities for development within the non-Green Belt settlements within Strategic Zone A, including Richings Park, Iver and Iver Heath.'

- 6.27 The applicant's case is that this purpose will not be compromised because the proposed development is geographically fixed at Pinewood and there are no non-Green Belt sites that could be used as a preference and so support urban regeneration and recycling of derelict and urban land.
- 6.28 It is accepted that the opportunity to deliver the overall proposals only exists at Pinewood, because it is established in this location and its importance to film making nationally. The Visitor Attraction in particular seeks to exploit the existing studio legacy that includes some of the most celebrated and successful movies. It is stated that 'the creation of a visitor attraction, built around this geographic connection will provide an authentic experience that has world wide appeal. This appeal only exists because it sits at the Pinewood home, where the movies are made.' It is accepted that this is geographically fixed and not "footloose"
- 6.29 The provision of additional floorspace for film production represents an expansion of existing capacity at Pinewood, whilst also creating an opportunity to deliver a working film studio that has a relationship with the visitor attraction. This link adds to the authenticity of the attraction. Further film production space would respond to the substantial demand that exists in both the West London Cluster and at Pinewood itself. It is accepted that this is geographically fixed and not "footloose"
- 6.30 The business and education hubs comprise a relatively small part of the proposal and while they are envisaged as being closely related to the existing film studio, having advantages of co-location with direct interrelationships with the presence and skills, opportunities and facilities present within Pinewood, it is not clear that a strong argument exists to locate these facilities within the Green Belt. The delivery of these facilities and the benefits is also uncertain.
- 6.31 Notwithstanding the close and interconnected relationship the main elements of the proposals have with the existing Pinewood Studios adjacent, it is considered that the business and education hubs do raise some conflict with this purpose. The harm is considered very limited.
- 6.32 In summary, the proposed development would constitute inappropriate development and will result in substantial spatial and visual harm to the openness of the Green Belt. In addition, the proposals will lead to a conflict with three out of the five purposes of including land in the Green Belt. The proposal would be contrary to policy GB1 of the Local Plan. In accordance with NPPF paragraph 148 local planning authorities should ensure that substantial weight is given to any harm to the Green Belt and 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The consideration of any 'other harm', benefits and other material considerations to be weighed in the Planning Balance are assessed in subsequent sections of this report.

## 7.0 Economic

Core Strategy Policies:

CP10 (Employment)

Local Plan Saved Policies:

E2 (Pinewood Studios)

- 7.1 Core Policy 10: Employment states that new employment development will be accommodated in in the District and Local Centres, on the Opportunity Sites and through appropriate intensification on existing employment sites excluded from the Green Belt, where there is good access by a variety of transport modes. It further states that the Council will seek to increase the presence of high value and knowledge based businesses in South Bucks. Local Plan Policy E2 (Pinewood Studios) supports the existing Pinewood Studios for film studio use.
- 7.2 The NPPF includes economic policy guidance which 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.”
- 7.3 Paragraph 82 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.
- 7.4 The Framework 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 and tourism are two of the five chosen pillars within the Industrial Strategy. Government policy targets growth in the sector requiring substantial increases in studio capacity and skills. The submitted Planning Statement cites the Creative Industries Sector Deal 2018 “Pinewood Studios Group is investing in a major extension of its studio facility in Buckinghamshire, adding six new soundstages, to be ready in 2019. This is phase two of an expansion programme which saw five new stages opened in 2016, and which is currently operating at 100% capacity. All of this amounts to a £200m investment initiative. The group also has plans for a major expansion at its Shepperton Studios, where it has recently acquired a new plot of land adjacent to the existing site.”
- 7.5 The Tourism Sector Deal was approved by Government in 2019 with an objective of building a world-class experience economy. A specific theme is ‘investment in attractions’ including ‘film and TV tourism’ with case studies cited of: Harry Potter Studios Tour. The proposed Visitor Attraction (Pinewood Studio Experience) accords with the type of investment in attractions envisaged in the Deal.
- 7.6 The Buckinghamshire Local Enterprise Partnership (LEP) Local Industrial Strategy places substantial emphasis on, and support for, the creative industries. Pinewood

Studios and the National Film and Television School are recognised as a centre of excellence for film and TV production. The Creative and Digital sector in Buckinghamshire is identified within the LEP's ambition for growth, including 'develop and enhance the Screen Industries Global Growth Hub at Pinewood Studios to improve links between creative content providers and the wider business and specialist education networks both on and beyond the Pinewood lot'.

- 7.7 The LEP has prepared an Economic Recovery Strategy (ERS) with a focus on short term interventions to help with the recovery of local economies and employment. This includes support for new studio development at Pinewood. The Chiltern and South Bucks Economic Development Strategy acknowledges the important economic contribution made by Pinewood Studios, being amongst the local area's biggest employers.
- 7.8 While the proposals are for employment generating uses and are associated with the existing Pinewood Studios site, the site of the application is within the Green Belt. The proposed development would therefore conflict with the local plan's employment policies.
- 7.9 However, this proposal will take advantage of the global asset and anchor institution of Pinewood, realising significant benefits to the national, regional and local economy. The delivery of this proposed facility is one of the priorities and key actions of Buckinghamshire's Local Economic Recovery Plan, enabling the expansion of studio space where there is considerable demand and which Pinewood is well placed to find in order for it to meet its target of being at the forefront of screen-based production and which will aid local, regional and national recovery.
- 7.10 The Screen Hub UK proposes the expansion of Pinewood Studios to deliver an integrated screen/film-inspired growth hub. The proposed development is an extension to the cluster of film-related uses based at Pinewood Studios with links to other screen based uses in Buckinghamshire and beyond. The growth hub is intended to provide links between content producers/providers and the wider business, education/skills and cultural networks in support of growth of the creative and digital sector. The proposed Screen Hub UK is consistent with the industrial and recovery strategies and economic priorities of HM Government and Buckinghamshire LEP. It represents economic development, bespoke to the opportunity that exists at Pinewood and part of a national and regional context.
- 7.11 The application includes an Economic and Social Benefits Assessment, which covers: jobs (construction and operational); increase in economic activity value (GVA); tourism effects; business growth and education/skilling. The estimated construction cost/involvement is £450m. The estimate of construction jobs is 1,648 pa over a three year construction period. The estimated number of jobs created total 3,567 (FTE) and are made up of: 1,438 direct jobs within the development, 1,230 jobs indirect and 899 arising from spill over effects. For the completed development the increase in GVA is estimated at £230m pa. The additional tourism spend is estimated at £124m pa.
- 7.12 The education hub is intended to provide for all ages, although with a short-term focus upon reskilling of the local workforce following the permanent impact on some sectors (e.g. aviation). The application identifies a minimum target for reskilling of 500 people pa in the first three years from set up. The business growth hub is

targeted to support the set-up and growth of 50 new businesses in the first three years from set up.

- 7.13 The Environment Statement includes Chapter 6 Socio-Economics and Human Health. The assessment has found that there will be a major beneficial impact on the labour force and the population, workforce and businesses that form the economy as a result of the proposed scheme, the creation of direct, indirect and induced employment (employment generated through 'spillover' benefits from film industry employment and additional expenditure from visitors); access to work and training; economic productivity effects and additional visitor expenditure which will support jobs in tourism.
- 7.14 There will be beneficial in-combination effects with regard to employment, access to work and training and productivity generated by the schemes.
- 7.15 The Council's economic development officers note that the application submission includes commentary on the alignment with relevant strategies at national, regional and local level and consider it to be clear that this proposal will deliver towards a number of these strategic aims. One of the four world leading assets and sectoral strengths of Buckinghamshire, and a cornerstone of the LIS, is Pinewood Studios, the home of the British film industry and centre of excellence for film and TV production. Pinewood Studios, alongside the National Film and Television School, is at the heart of the creative industries sector cluster.
- 7.16 The development of a new Screen Industries Global Growth Hub at Pinewood Studios is specifically promoted in the Local Industrial Strategy (LIS) "to better link creative content providers with open access technical resources and with businesses and education networks, enhancing collaboration and providing opportunities for inspiration between businesses and education providers on skills development". The submission of this outline application is an important step to realising the goals in this strategy. It represents a significant commitment to, and investment in, delivering a further world class facility of scale with a global reach, building on the reputation and heritage of Pinewood.
- 7.17 The visitor attraction will significantly boost tourism as up to 2 million visitor numbers are expected. This is likely to become a valuable and popular year-round attraction and provide a much needed boost to the visitor economy in the county and region, as visitors also take in other attractions as part of their visit as well as use restaurants, hotels etc. This will have an overall positive effect and at a time when this sector has been particularly negatively impacted.
- 7.18 Within objections to the application questions have been raised over the jobs forecast and their reliability. Officers are satisfied that both the Economic and Social Benefits Assessment and the ES Chapter 6 Socio Economics and Human Health, set out a clear approach and methodology and draw on appropriate published references, and do not considered that the estimates are incorrect.
- 7.19 The Council's economic development officers advises that this is a project of national significance that aligns with National priorities and commitments. The project has received support from members of the House of Commons and House of Lords, including written endorsement from the Secretary of State for Digital, Culture, Media and Sport supporting the exciting proposal which has the potential to form an important part of the government's work in championing the success story of British

film to a global audience. Letters of support from the British Film Commission, Film London, Creative England, UK Screen Alliance and the Royal Television Society all highlight the significance of this investment and confirm the role it can play in boosting the creative industries sector, skills base and visitor economy. They also demonstrate the core existing networks already in place between Pinewood and these key institutions and which will only be further enhanced as a result of this proposed expansion. Buckinghamshire Growth Hub (BBF) and Buckinghamshire LEP have also offered their support to the proposal. Letters of support are included as an appendix to the Planning Statement and the submitted Summary of Support Nov 2021.

- 7.20 This proposal represents a substantial private investment from one of Buckinghamshire's anchor institutions. It will help to realise the potential of this economic asset to make a further significant contribution to the national drive to raise productivity, enable economic growth and further place Buckinghamshire as the focus and heart of the UK creative industries sector. It aligns with the aims and objectives of the Local Industrial Strategy for Buckinghamshire as well as the Economic Recovery Plan and proposed Growth and Recovery Deal proposition to Government.
- 7.21 In summary, it is the proposal is of national significance and will be of significant benefit to the national, regional and local economies. Whilst this is especially valuable at this time of economic uncertainty, the long term, permanent economic benefits are very substantial. They will have both direct and indirect benefits, retaining and creating thousands of jobs, attracting visitors and spend to the area, and contributing to GVA. It will build on existing educational and business networks in the region, opening up opportunities to train, work and grow businesses in this sector. This investment will cement Pinewood at the heart of the UK film industry and build on the wider reputation of the UK as a world-class visitor destination. The Council's Economic Development Officers are in full support.
- 7.22 The economic benefits of the proposed development are considered to be very substantial and weigh positively in favour of the proposals in the planning balance. Whilst there is conflict with the Core and local plan policies, the proposal is consistent with the industrial and recovery strategies and economic priorities of Government and Buckinghamshire LEP, and is consistent with the NPPF. A development of the scale and type proposed has the potential to bring significant economic benefits directly and indirectly and locally to nationally. The level of job creation and wider suite of economic benefits is a significant and substantial material consideration. Because of the national significance of Pinewood and the national benefits to the film industry and visitor economy as well as the regional and local economy, the economic benefits are attributed very significant weight. Positive impacts on social wellbeing derive from the economic benefits and these are benefits that can be attributed very significant weight.

## 8.0 Design (Raising the quality of place making and design)

Core Strategy Policies:

CP8 (Built and historic environment)

Local Plan Saved Policies:

EP3 (The Use, Design and Layout of Development)

EP4 (Landscaping)

EP6 (Designing to Reduce Crime)

EP7 (Signs and advertisements)

- 8.1 Saved Local Plan policy EP3 states that development will only be permitted where its scale, layout, siting, height, design, external materials and use are compatible with the character and amenities of the site itself, adjoining development and the locality in general. Poor designs which are out of scale or character with their surroundings will not be permitted. The policy states that the layout should not be dominated by large areas set aside for parking, servicing or access, and where extensive space is required for such activities, it should be sub- divided by landscaping. It further states that the layout of new development should, where possible, create attractive groupings of buildings and spaces between buildings. Saved Local Plan policy EP6, states that development should be designed and laid out to reduce the opportunity for crime against both people and property.
- 8.2 Core Strategy policy 8 states that all new development must be of a high standard of design and make a positive contribution to the character of the surrounding area. It states that new development should be designed to help tackle the causes of, and be resilient to the effects of, climate change.
- 8.3 The NPPF (2019) 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. 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.
- 8.4 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. 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'.
- 8.5 The application has been submitted in outline form with all matters reserved except for principal points of access. The scheme detailed design is for consideration at the Reserved Matters Stage. However the proposals include development parameters for approval. The Parameter Plans fix key elements in terms of the maximum scale and quantum allowed for but do provide flexibility at the detailed design / reserved matters stage. These include:
  - Defining the key zones of development – visitor attraction and production



- Setting out the green infrastructure framework.
  - Creating building zones to identify where built form will be located
  - Identifying areas for movement and parking
  - Indicating the location of vehicular access
  - Providing an indication of floor levels and building heights.
- 8.6 The parameter plans will provide the basis for control over the design quality that comes forward at Reserved Matters stage. The Development Framework & Design and Access Statement has set out the design rationale for the proposed development including the development parameters. The scheme is substantial in scale and reflects the scale of development that exists at Pinewood. It also makes provision for extensive green infrastructure, which is a dominant feature, particularly on the outer edges of the site. An illustrative masterplan is provided which illustrates how the parameter plans could be interpreted at detailed design stage.
- 8.7 The Development Framework and Design and Access Statement contains a design guidance section to illustrate how elements of the development could be taken forward. Central to this is a landscape strategy which illustrates some key green infrastructure elements, reinforcing, extending and enhancing landscape screening around the perimeter of the site as well as landscape / ecological connectivity. The car parking areas are to be substantially landscaped and sub divided by tree lines and hedgerows.
- 8.8 The guidance identifies the defining features for the different building uses proposed. For the Visitor Attraction this includes the creation of a high-quality arrival experience including entrance plaza; with the scale and form of buildings informed by the existing Pinewood production facilities to create a development that has the look and feel of a working production lot. The Production studios would be similar to those existing. The Business and Education Hubs (Centre Stage) will be one or more individual or interconnected buildings (up to 5 main structures, up to 3 storey high) sited adjacent to Pinewood Road, a space that allows for multiple functions to take place, whilst balancing the desire for a high quality building with the functional requirements of its potential business, education and community user.
- 8.9 The design guidance is proposed to be advisory to inform the preparation of reserved matters detail over which the planning authority holds rights of approval in the normal manner. A condition would provide for the development to be carried out substantially in accordance with the content of the Development Framework and Design and Access Statement.
- 8.10 At present the site is restored open farmland with trees at the perimeter, including Black Park woodland as a backdrop. The fundamental characteristics of the site would change significantly as a result of the proposed development including significant loss of open space and loss of the verdant and semi rural landscape character. This is addressed in the landscape and visual impact section [below].

*Layout and grain*

- 8.11 The development elements and their layout and access arrangements are described at paragraphs 2.14 – 2.20 above.

- 8.12 The majority of the built form is grouped towards the central and western portions of the site with parking to the southern and eastern areas. Both illustrative masterplan options identify large groupings of buildings of a more regimented grain and scale than Pinewood West, but somewhat less formulaic than Pinewood East. The morphology would therefore indicate a character of development somewhere between the two existing complexes.
- 8.13 The clustering of mixed building heights and volumes provides greater visual interest and richness to the environment, rather than depending on formulaic and prescriptive development which cannot easily be broken or layered. Given the closer relationship of the site to Pinewood West, aligning the design cues and development typology here would offer a greater sense of connection and contextual reaction.
- 8.14 A design concern is the large expanse of surface level car parking which risks dominating the site. The masterplan provides a sense of containment through the use of green/blue infrastructure boundary treatments and buffers. These buffers and the extensive use of integrated landscaping throughout the site is imperative to ensuring any sense of the site's verdant character is retained, as well as to mitigate the extensive surface car parking.

#### *Scale and massing*

- 8.15 The outline buildings heights provided offer a degree of variation. Along the edges of the visitor attraction and production studio that border the central element of the site, the maximum height will be 9.2m. The maximum height of the education and business hub will be 14.5m. This arrangement will maximise the distance between buildings and viewer from the south and east with the potential to reduce their visual impact as a result. This broad approach is likely to have a lesser adverse impact than tall buildings close/adjacent to the public road. This is borne out by the ES LVIA. However the tallest building up to 21.5 m high would be close to the boundary with and impact on views from within Black Park and together with a working backlot would the affect the character of the eastern edge of the Park. The proposed woodland planting along this northern boundary and siting of buildings as indicated on the parameter plans would help to reduce the impact. Full details of scale and massing will form part of the reserved matters submission.

#### *Landscaping*

- 8.16 The landscaping design is for consideration at the reserved matters stage. The supporting ES and green infrastructure parameter plans defines the existing landscaping to be retained and identifies the opportunities for new planting including woodlands planting buffers within and around the boundaries of the site. The Council will need to ensure that the landscape is appropriate in mitigating the impacts of the development and securing the landscape strategy objectives. The design of the buffer to Black Park and other important routes for wildlife will need to be ecology led. The public entrance to the site should be focused on a high-quality landscaped approach to the visitor centre. A high quality landscape within the site will help mitigate the visual impact of the extensive car parking but also maximise the amenity of workers and visitors to the site and aid the incorporation of habitats and biodiversity, contributing to sustainable development.

#### *The Peace Path*

8.17 The Peace Path is a long established route that is well used. The loss of the Peace Path in its current location is a design and placemaking consideration, particularly in light of Section 12 of NPPF Achieving well designed places, with emphasis on taking the opportunities available for improving the character and quality of an area and the way it functions, with clear references to creating accessible links to public space and achieving high standards of amenity.

8.18 The applicant has stated that public access cannot be maintained through an operational film production site and comments:

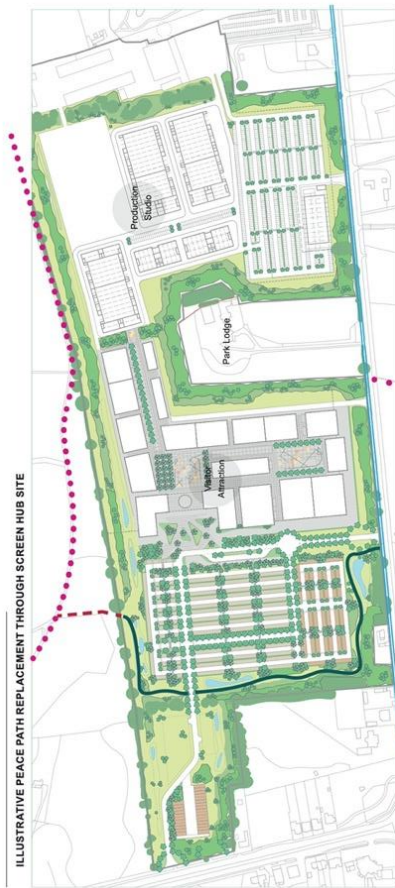
- a. the existing PP is provided at the discretion of Pinewood Studios and can be closed temporarily or permanently at any time. The base-line for decision is the existing status. It cannot be that of a permanently available public path
- b. the environmental condition of the path is poor and it is at times unpleasant to use (arising from anti social behaviour amongst others)
- c. the location of the PP is not the most convenient or accessible to the majority of the adjacent residential area of Iver Heath (contrary to the view expressed by BC officers)
- d. the applicant has offered a replacement path that is a substantial improvement being more accessible to more residents and of far higher quality
- e. the replacement path is of equivalent status (discretionary) to the existing
- f. BC has requested the new PP to be provided on a permanent (in perpetuity) basis ie. a public right of way. This has been declined by Pinewood Studios.

The basis for determination of the application is therefore a new path of equivalent status to the existing, with improved accessibility to the widest area users and of a suitably better environmental standard ie. a pleasant landscaped footpath and cycleway. This is objectively a benefit and should be given weight as such.



Blue = Existing Peace Path

Yellow = Proposed 'A new Peace Path'



Illustrative masterplan showing 'A new Peace Path' in green.

- 8.19 The accessibility of the proposed relocated Peace Path is addressed in section 11 Highway Safety, Transport and Access. The proposed Peace Path would be longer connection between Pinewood Road and Black Park in distance but has the potential to be of higher quality than the existing, and therefore considered acceptable in design terms.

### *Conclusion*

- 8.20 The Parameter Plans establish the framework for future design development when sensitivities in relation to design, visual appearance and the amenity of adjoining users can be addressed. The proposed Parameter Plans and Development Framework and Design and Access Statement including design guidance should serve to support good design outcomes at Reserved Matters stage. Good design should include mitigating adverse impacts particularly in relation to Black Park and its setting, and also creating attractive groupings of buildings and spaces between buildings as well as breaking up the expansive surface parking effectively with trees and landscape. Approval would be subject to appropriate conditions to agree the design and specific details of materials, boundary treatments, landscaping, and lighting etc. It is considered that the proposed development therefore accords with planning policy and the principles of good design set out within the NPPF.

## 9.0 Landscape, Visual and Trees

Core Strategy Policies:

CP8 Built and historic environment

CP9 Natural environment

Local Plan Saved Policies:

EP3 The use, design and layout of development

EP4 Landscaping

L10 Proposals involving felling or other works affecting trees covered by a Tree Preservation Order

9.1 Core Strategy policy 8 states that all new development must be of a high standard of design and make a positive contribution to the character of the surrounding area. Policy CP9 places the highest priority to the conservation and enhancement of the natural beauty of the Chilterns Area of Outstanding Natural Beauty, and the integrity of Burnham Beeches Special Area of Conservation. More generally, it seeks to ensure the landscape characteristics and biodiversity resources within South Bucks will be conserved and enhanced by:

- Not permitting new development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided, resulting in a net gain in biodiversity.
- Seeking the conservation, enhancement and net gain in local biodiversity resources within the Biodiversity Opportunity Areas, on other non-designated land, on rivers and their associated habitats, and as part of development proposals.
- Maintaining existing ecological corridors and avoiding habitat fragmentation.
- Conserving and enhancing landscapes, informed by Green Infrastructure Plans and the District Council's Landscape Character Assessment.
- Improving the rural/urban fringe by supporting and implementing initiatives in the Colne Valley Park Action Plan.

9.2 Saved Local Plan Policy EP3 requires the layout and siting of development to be compatible with the character and amenities of the site itself, adjoining development and the locality. Saved Local Plan Policy EP4 details the importance of incorporating appropriate landscaping within development proposals and the need to take account of, and retain, existing planting and landscape features, which are or may become important elements in the character and appearance of the site and wider area. Policy L10 relates to proposals involving felling or other works affecting trees covered by a Tree Preservation Order.

9.3 The NPPF at Paragraph 174 advises that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and by recognising the intrinsic character and beauty of the countryside. Paragraph 130 c) emphasises the importance of ensuring new developments are sympathetic to local character, including the landscape setting. Paragraph 134 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.

- 9.4 The application is accompanied by a Landscape Strategy, which seeks to retain and extend the key existing landscape features, predominantly located around the perimeter of the site, to provide new and enhanced green/ blue infrastructure that surrounds the development and provides screening and landscape/ ecological connectivity in keeping with local landscape character. The parameter plans and design strategy seeks to keep building heights lower in proximity to visual receptors, retaining trees of value, replacement trees, management of green infrastructure, and lighting design to minimise light spill. The green infrastructure is an integral feature of the development and this plays a role in mitigating the impact of the development. This includes creating a green buffer of 25-30m depth around the majority of the site and retaining all high and medium value trees.
- 9.5 A Landscape and Visual Impact Assessment (LVIA) has been undertaken as part of the ES, (Chapter 7 Landscape and Visual) and includes an appraisal of the main landscape and visual issues and reports the outcome of the assessment of likely significant environmental effects arising from the proposed development in relation to landscape and visual amenity. It is noted that lighting has been scoped out of the ES and night-time effects have not been. It is stated that all effects associated with lighting will be avoided through good design measures the supporting Framework Lighting Strategy.

#### *Landscape character*

- 9.6 The Site is referred to within the Colne Valley Regional Park Landscape Assessment (2017) as the LCA O4: Iver Heath Mixed Used Terrace, as described in the South Bucks District Landscape Character Assessment. The characteristics of the area include: the hedgerow network which connects fragmented habitats; in-field trees; open long views over arable fields; and undeveloped spaces, in between developed areas. The Colne Valley Regional Park landscape objective is to "maintain and enhance the landscape, historic environment and waterscape of the park" and its countryside objective is to "safeguard the countryside of the Park from inappropriate development. The ES recognises that the LCA has a degree of susceptibility to new development, because, although the site lies within a discordant landscape that is highly influenced by development and dominated by settlement, the undeveloped areas are noted as sensitive. Landscape sensitivities set out in the Colne Valley Landscape Character Assessment include: the hedgerow and woodland network which provides visual unity and a wildlife corridor, connecting fragmented habitats; and undeveloped spaces/fields between areas of development which provide reminders of the former land use and origins of this landscape. Overall, the landscape sensitivity is judged to be medium.
- 9.7 The ES reports that there will be an inevitable landscape effect resulting from the change on site from open fields to a developed area, within the Iver Heath Mixed Use Terrace LCA. The scale and extent of the development is such that the character of the site will fundamentally change as a result of the loss of open land and presence of new large scale buildings, increased built nature of the area, access points and road widening works and the open setting to Black Park will be largely lost. This will be a permanent and significant moderate adverse effect at year 0 and the residual long terms effect at year 15 remains a moderate adverse effect which is significant.

- 9.8 The applicant states that the landscape strategy aligns with the aims and objectives associated with the Colne Valley Regional Park Action Plan, to protect, manage and enhance habitats, on the basis that the proposed green infrastructure and landscape features are significantly more valuable than the existing site. The Colne Valley Regional Park do not agree and have objected to the application, arguing that the proposals are inappropriate development in conflict with their objectives to 'maintain and enhance the landscape, historic environment and waterscape of the park' and "safeguard the countryside of the Park from inappropriate development'. CVRP also cite impacts on Black Park and the failure to take the opportunity to improve connectivity to it, in particular. These are matters that have been considered in the GB section above and here. Temple, appointed by the council as independent consultants, reviewed the effects in the ES on landscape character and officers are satisfied that this has been correctly assessed.
- 9.9 The scale and extent of the development is such that the character of the site will fundamentally change and the open setting to Black Park will be largely lost and significant moderate adverse effect on landscape character of the site and this part of Iver Heath LCA which lies within the CVRP at year 15. It is considered that this would represent significant harm to the localised area including the character of that part of the LCA. It is also considered that the proposals in this respect are in conflict with CVRP objectives.

#### *Visual*

- 9.10 In terms of impact on views, LVIA assessment viewpoints have been selected from publicly accessible locations (Pinewood Road, Uxbridge Rd and Black Park) to illustrate the visual effect of the maximum building parameters that will be experienced. It is reported that visual receptors are likely to be in close proximity to the site (due to existing buildings and roadside vegetation screening views from further afield). The ES assessment is that there will be significant moderate to major adverse impacts on a number of views in the short term, until planting has matured to screen the development. For the residents at Royal Lodge / Park Lodge there will be a longterm / permanent significant moderate to major adverse visual impact as a result of being surrounded by new woodland belts beyond which are relatively large buildings, potentially at a minimum of 50-80m away. It is considered that these conclusions are correct.
- 9.11 Views from the existing Peace Path have not been considered as this is to be relocated. The effects on recreational users of footpaths in Black Park have been considered. It is noted (ES 7.65) that: Views from the PRoW along the eastern edge of the park are directed predominantly along the route of the path (north/ south) with oblique views through to fields and active/ restored mineral workings, with a backdrop of trees and the occasional building nestled within vegetation'. It is concluded within the ES that overall the sensitivity of this receptor is medium and that while there will be a long-term adverse effect (minor-moderate), this is considered to be not significant. This conclusion is not accepted. Under the Heritage section of the report (11.6) it is reported that there are a number of key viewpoints of the listed building Little Coppice from the public right of way within Black Park across the open site, which will be impacted or lost.
- 9.12 In addition the introduction of lighting associated with the development would represent a change in the nighttime character and visual effect which would have

potential adverse impact, although would be viewed in the context of the existing development. Conditions can be imposed to seek to minimise the impact.

9.13 Temple, appointed by the council as independent consultants, reviewed the effects in the ES on landscape visual effects and officers are satisfied that this has been correctly assessed.

9.14 A summary of residual significant landscape and visual effects is provided below.

Receptor	Residual Effect	Significance
<i>Landscape</i>		
Iver Heath Mixed Used Terrace LCA	Year 0: Moderate adverse	Significant
	Year 15: Moderate adverse	Significant
<i>Visual</i>		
Residents at Park Lodge Farm	Year 0: Moderate adverse	Significant
	Year 15: Minor neutral	Not significant
Local community to the east of Pinewood Road	Year 0: Moderate adverse	Significant
	Year 15: Minor neutral	Not significant
Residents at Royal Lodge/Park Lodge	Year 0: Moderate adverse	Significant
	Year 15: Moderate (Moderate-major for layout PP3B) adverse	Significant
Local community to the west of Pinewood Road	Year 0: Moderate adverse	Significant
	Year 15: Minor neutral	Not significant
Users of Pinewood Road	Year 0: Moderate adverse	Significant
	Year 15: Minor – moderate neutral	Not significant

#### *Coalescence and settlement identity*

9.15 The proposed development will inevitably result of built development on this site and expansion of the urban development on the edge of Iver Heath. It will result in north-south merging of development across the Uxbridge Road. The village of Fulmer lies a distance to the northwest of the existing Pinewood development on the opposite side to the application site and thus the gap between existing and Fulmer, this gap would not be eroded. The development to the south of Pinewood would not result in a perception of coalescence between Iver Heath and Fulmer and would maintain the settlement identity and sense of place of these settlements.

#### *Trees*

9.16 The ES advises that features of the proposals that have been included with the specific purpose of minimising impacts on landscape and visual receptors include retaining all high and medium value trees with appropriate root protection buffers where possible, as identified by the Arboricultural Impact Assessment (AIA). The submitted AIA outlines that if any trees are removed, tree loss will be limited and will be identified as part of detailed design/reserved matters. Retained tree features will be protected and current proposals do not result in the need to prune any trees.



- 9.17 It is noted that the proposed parameters providing for Green Infrastructure around the perimeter of the site will be between 10m and 30m in depth with appropriate landscaping provision where building zones are close to adjacent residential properties (typically a 15m depth of woodland planting). As long as these buffers are not reduced there should be the flexibility to ensure that when final design is considered in collaboration with arboricultural consultant, ecologist, landscape architect, engineers etc the root protection areas (RPAs) of retained trees are not significantly affected. The positioning of SUD's and any ground levels changes as part of the creation of bunds need to respect the RPAs of adjacent trees. This can be secured by condition.
- 9.18 The tree officer advises that the proposed development would benefit from a minimum 15m zone for planting/screening along Pinewood Road instead of the suggested minimum 10m buffer and that the landscape scheme at reserved matters stage will need to consider the ultimate sizes (height/spread) of new trees being proposed throughout the site (car parks as well as GI buffers) to ensure they can attain a mature size as envisaged and to achieve ecological net gain. Details of tree planting and other landscaping would be secured by condition. There would also be conditions requiring a landscape management plan and Tree protection.

#### *Summary*

- 9.19 The scale and extent of the development is such that there will be a significant adverse effect as the character of the site will fundamentally change and the open setting to Black Park across this site will be largely lost and this will be harmful to the local context and is in conflict with CVRP objectives. There would also be significant adverse impacts on a number of views in the short term until planting has matured to screen the development. For the residents at Royal Lodge / Park Lodge there will be permanent significant adverse impact. Views across the site from Black Park will be impacted, including to Little Coppice.
- 9.20 The development seeks to retain important landscape features as required by local plan policy L10. It would also result in significant moderate harm to the landscape character of the area, and harm in terms of visual effects and therefore the proposals are considered to conflict with Core Strategy policies C8 and CP9. Overall this results in localised harm which would be carried forward to the planning balance.

## **10.0 Residential amenity**

Core Strategy Policies:

Core Policy 13 Environmental and resource management

Local Plan Saved Policies:

EP3 (The use, design and layout of development)

EP5 (Sunlight and daylight)

- 10.1 Core Policy 13 Environmental and resource management requires new development to be directed away from existing sources of noise.
- 10.2 Saved Local Plan Policy EP3 states that development will only be permitted where its scale, layout, siting, height, design, external materials and use are compatible with the character and amenities of the site itself, adjoining development and the locality in general. Poor designs which are out of scale or character with their surroundings will not be permitted. It states that layout should not be dominated by large areas set

aside for parking, servicing or access, and where extensive space is required for such activities, it should be sub- divided by landscaping. The layout of new development should, where possible, create attractive groupings of buildings and spaces between buildings. Saved Local Plan Policy EP5 states that development will only be permitted where its design and layout would not result in a significant loss of daylight or sunlight to adjacent buildings or land.

- 10.3 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.
- 10.4 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.
- 10.5 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.
- 10.6 The proposed development is substantial in scale and reflects the form and nature of the existing Pinewood Studios. It is in contrast with the character of the wider locality. There are five existing residential properties on the western side of Pinewood Road that will be in close proximity to the proposed development.
- 10.7 Park Lodge Farm is located to the north of the site abutting the Pinewood West site and would be contiguous to its rear with the Production Studios development zone and to its south with the Movement (parking) zone.
- 10.8 Park Lodge and Royal Lodge are located centrally – the site surrounds them on three sides. These properties are set within an extensive shared curtilage, extending to approximately 2.45ha and are accessed via a shared driveway from Pinewood Road. The existing residential buildings are set deep within the site and would be contiguous to the north with the Production Studios development zone and to the west and south with the Visitor Attraction zone. The curtilage towards Pinewood Road would be contiguous to the north with the Movement (parking) zone and Centre Stage is also to be located in this zone. To the south would be either the Visitor Attraction building or parking, depending on the layout option proposed.
- 10.9 Firtree Cottage, Pinewood Road is located to the south and is within the site curtilage. It would be located within / surrounded by the Green Infrastructure buffer and the Visitor Attraction Movement / parking zone.
- 10.10 Pinewood Manor is located to the south of and adjoining the site. Its northern boundary would be adjacent to the Visitor Attraction Movement / parking zone.
- 10.11 As previously explained this is an outline application with matters of layout, appearance and scale reserved for approval at a later stage. Within the ES, based on the parameter plans consideration is given to the visual impact of the proposed development. This includes a range of visual receptors, some of which are within

adjacent to residential areas. The assessment concludes that the only properties where there would be an impact of significance are Park Lodge and Royal Lodge. For all the other properties, it is stated that the impacts are mitigated by the provision of landscaping within the green infrastructure framework. The visual impact assessment concludes on these two properties that the impact would be moderate or moderate to major, depending on the Visitor Attraction layout option.

10.12 This ES conclusion is not accepted and it is considered that in addition to Park Lodge / Royal Lodge the development would also impact outlook and visual amenity to Firtree Cottage, which has a shallow curtilage and therefore be in relatively close proximity to an expansive car park. With larger curtilage and greater separation Park Lodge Farm and Pinewood Manor would also be impacted but to lesser extent.

10.13 The proposed mitigation around Park Lodge and Royal Lodge will include a landscape buffer of at least 25m in depth, which will filter views of the development. In addition, there will be a greater depth of buffer to the east of the properties and lower height parameters in all directions around the property. These features would mean that the nearest buildings could be 60-90m away from the properties. The scale of change from the existing base line is significant however, the impact on the amenities of these dwellings would be mitigated by the extent of green infrastructure and buffer provisions. These dwellings also retain an open aspect eastwards to Pinewood Road, across their own residential curtilage. Given the separation between the proposed building and these dwellings it is not considered that any concerns arise in terms of overshadowing or loss of privacy. However it is considered that there will be a detrimental impact on outlook.

10.14 The ES Chapter 12 assesses the potential noise and vibration impacts of the proposed development. Construction of the proposed scheme will generate noise from construction activities on site and construction traffic on the surrounding road network. Proposed mitigation is through the implementation of good practice measures, and it is concluded that all construction phase effects will not be significant. During operation, road traffic will generate noise on surrounding roads and within the car parks of the proposed scheme itself. The assessment found that, whilst road traffic noise will increase in the locality, including on Sevenhills Road, this is as a result of the completion of the Sevenhills Road improvements (which may take place independently of this development), which will redistribute traffic on the local road network. The contribution of the Proposed Scheme to this increase is not considered significant.

10.15 Following the implementation of measures, including the potential for noise barriers (a fence and/or earth bund), noise from the use of the car parks within the Proposed Scheme will be controlled and is not considered to be likely to be significant. The Production Studio soundstages will be designed to provide a very high level of sound reduction. Filming in backlots will be controlled through the adoption of a Backlot Management Plan that provides control mechanisms in line with the relevant standards. Operational noise from filming activities is not considered to be significant.

10.16 The Environmental Health Officer advises that the noise impacts of the proposed development can be addressed by way of condition. These conditions will require the submission of further information around the means of control and mitigation of activities that generate noise and vibration, with specific reference to construction

(via a Construction Environment Management Plan) and operational activity (including the operation of the backlot).

10.17 The proposals, through the parameter plans and supporting documents have sought to take into account the policy objectives designed to protect amenities. Through the detailed design and reserved matters process the Council would seek to minimise impacts and secure appropriate mitigation. It would however be reasonable to conclude that the development would have an adverse effect in terms of the outlook and visual amenity as described at 10.12. It is also likely that the extensive areas of car parking would generate noise and require artificial lighting which would also impact the amenities of five properties on Pinewood Road. However, these impacts would to an extent be mitigated by the proposed landscape and woodland buffers. Approval would be subject to appropriate conditions to agree the specific details necessary to secure controls over external lighting, noise generating plant and machinery and potentially hours of operation to protect the amenities of these most adjacent residential occupiers. Such controls would also serve to protect the residential amenities of occupiers to the east of Pinewood Road.

10.18 It is concluded that the scale of development is not wholly compatible with the character and amenities of the adjoining developments, the five residential properties located on the west side of Pinewood Road in particular, and therefore there is a conflict with local plan policy EP3. However the impacts would be mitigated, the harm to residential amenities is limited and refusal of permission on these grounds would not be justified. The weight to be attributed to the limited harm would be carried forward to the planning balance.

## **11.0 Heritage**

Core Strategy Policies:

CP8 (Built and historic environment)

11.1 The application proposals have been assessed in relation to the relevant statutory duty contained in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. This has the effect of establishing a strong presumption in favour of the preservation of the settings and significance of listed buildings. Any harm to the significance of a listed building should be given considerable importance and weight.

11.2 Core Policy 8 Built and Historic Environment places paramount importance on the protection and, where appropriate, enhancement of the historic environment. It states that all new development must be of a high standard of design and make a positive contribution to the character of the surrounding area. This policy is not entirely consistent with the language of the NPPF set out in paragraphs 199 and 202 as they apply in this instance, how this harm should be quantified, and the balancing of harm against public benefits, and can only be afforded limited weight.

11.3 The NPPF at paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed

against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In that balance, considerable importance and weight should be accorded to the harm to the heritage asset.

- 11.4 Archaeology and Built Heritage have been scoped out of the Environmental Statement on the basis that it was not considered that the proposed development would result in significant effects. In relation to archaeology, it is stated that a small margin at the boundary of the site was not subject to mineral workings, however this very limited area falls outside built development zones.
- 11.5 In relation to built heritage, there are two listed buildings which need to be considered, one of which is within Pinewood Studios (Heatherden Hall) and the other is Little Coppice, which is a Grade II listed cottage located to the east of Pinewood Road. Other designated heritage assets in proximity to the development site are: Langley Park – Grade II Registered Park and Garden & associated Listed Buildings; and, St Margaret’s Church, Iver – Grade II Listed Building. These have sufficient separation distance and the presence of intervening development to ensure the setting of these assets will not be affected by the proposed development.
- 11.6 Little Coppice lies c.100m east of the development site on the east side of Pinewood Road and set back from the highway along a private driveway. The Voysey’ inspired design is characterised by the whitewashed roughcast render with feature pyramid roof and central brick stack. The building carries significance through its historic value, aesthetic value, architectural value and rarity, its setting contributes to this because of the views and sense of isolation. There are a number of key viewpoints of the listed building from across the development site and from the public right of way within Black Park. The driveway to Little Coppice also creates a well defined channelled vista towards the development site. The listed building’s prominence makes it a local landmark and a strong visual receptor from the parkland. The building’s heavily treed backdrop and verdant open and semi rural setting to the east give it a sense of isolation.
- 11.7 The heritage officer raises concerns that the proposed development would obscure long distance viewpoints of the listed building and its associated outbuildings from Black Park. The development would sit in the foreground of the buildings driveway vista and erode the currently open verdant views looking westwards from the building’s frontage. The development would therefore truncate the buildings sense of isolation, its semi rural setting and obscure one of the building’s key public vantage points, to which it is currently enjoyed and experienced. The applicant considers that this is a long distance view which has been over stated by the heritage officer and that there will be a minor change in view and visibility which is agreed as less than substantial at the very lowest end of that scale. Officers agree with the heritage officer that the proposed development would result in less than substantial harm to the setting of the listed building, which is at the lower end of the spectrum of less than substantial harm.
- 11.8 Heatherden Hall lies to the south of the original Pinewood East complex and is a Grade II Listed archetypal late-Edwardian country mansion. The Hall is located c.300m north of the development site separated by a mature tree belt and the formal gardens. The house dates to c.1865 and is a key site in the history of the British film industry. The building carries significance through its architectural, historic, aesthetic and social and communal value and through its rarity. Its setting

contributes as identified above; due to the formality of the grounds and close interrelationship with the studios as a functional entity.

- 11.9 The northern boundary of the application site contains a tree belt with mature oaks to the west and some newly planted trees to the east. This provides sufficient visual separation between the Hall and the site to ensure there will be no direct visual impact on the setting of the heritage asset from the proposal development. The masterplans does indicate improved linkages between the development site and Heatherden Hall which could potentially open up views and access, however, through careful consideration at reserved matters stage any harm can be avoided.
- 11.10 Objections to the application have alleged harm to other designated heritage assets, including Heatherden Hall. The Heritage Officer has addressed these assets and any impact and advises that the northern boundary of the site contains a tree belt and provides sufficient visual separation of the Hall to the wider site to ensure there will be no direct visual impact on the setting of the heritage asset from the proposal development. It has also been alleged that there would be harm to Langley Park which lies to the south side of Uxbridge Road c250m south west of the site and St Margaret's Church which lies c. 350m south-east of the development site but the Heritage Officer advises that there is sufficient separation distance and the presence of intervening development which ensures the setting of these designated assets will not be affected by the proposed development.
- 11.11 Non designated heritage assets: There are no non designated heritage assets identified. It has also been suggested that Black Park deserves heritage consideration but it is not a designated heritage asset nor has it been identified as a non-designated heritage asset by the Council's Heritage advisor.
- 11.12 In summary, the development would result in less than substantial harm to the setting of Little Coppice a designated heritage asset to which great weight is given in accordance with NPPF paragraph 199 and this should be balanced against the public benefits of the scheme in line with national policy, and this will be dealt with later in the report. In relation to other heritage assets it is considered that the development proposals preserves their setting and does not result in harm. In relation to potential archaeological interest, a condition could be attached requiring archaeological evaluation in form of trial trenching in areas of previously undisturbed ground. It is considered that the less than substantial harm identified represents a conflict with development plan Policy CP8 (Built and Historic Environment) and as set out above policy CP8 can only be afforded limited weight.

## **12.0 Highway Safety, Transport and Access**

Core Strategy Policies:

CP7 (Accessibility and transport)

Local Plan Saved Policies:

TR4 (Provision for those with special needs)

TR5 (Access, highways work and traffic generation)

TR7 (Parking Provision)

TR10 (Heavy goods vehicles)

TR12 (West Drayton to Poyle railway line)

TR13 (Freight facilities)

- 12.1 Core Policy 7 Accessibility and Transport, seeks to improve accessibility to services and ensure a safe and sustainable transport network by supporting the rebalancing of the transport system in favour of more sustainable modes of transport, including by encouraging safe and attractive improvements to pedestrian and cyclist routes and facilities.
- 12.2 Saved Local Plan Policy TR5 Access, highways work and traffic generation, addresses the effect of development on safety, congestion and the environment and states that where off-site improvements to the highway are required to serve a development, permission will not be granted unless the applicant enters into a planning obligation to secure the implementation of those works.
- 12.3 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”.
- 12.4 Paragraph 111 of the NPPF 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.” 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.”
- 12.5 All matters are reserved apart from the principal points of access. Three primary vehicular and pedestrian access points are proposed; one from the A412 Uxbridge Road and two from Pinewood Road. The Visitor Attraction is accessed from Uxbridge Road and Pinewood Road with a secondary vehicular access from Pinewood Road for service vehicles. The new studio production space and business and education hubs are to be served from Pinewood Road. The application seeks detailed approval of the proposed means of vehicular access into the application site from the public highway. The proposals include the following:
- Main access - a proposed ‘left in / left out’ junction off the A412 Uxbridge Road
  - Main accesses – 2 no. all access junctions off Pinewood Road; and
  - Secondary access – from Pinewood Road, including a low key all access junction.
- Internal access arrangements within the application site are reserved for subsequent approval.
- 12.6 It is proposed to deliver highway mitigation works as part of the proposed development. These include the Five Points Roundabout (FPR) and Sevenhills Road (SHR) improvement schemes (which are the subject of a separate application and, in

the case of SHR, permission, respectively) and a signing strategy. It should be noted as part of a permission (13/00175/OUT) granted in 2014 for the Pinewood Studios Development Framework (PSDF), there was a requirement for mitigation to be provided at Five Points Roundabout (FPR), at the southern end of Pinewood Road. The agreed and approved mitigation at that time was the provision of a signalisation scheme of the roundabout, providing signals on four out of five arms of the junction; the provision of additional lanes on the inside of the roundabout, and a displaced pair of Toucan Crossings on the A4007 Slough Road. This scheme has not been delivered. A proposed alternative, Sevenhills Road PSDF mitigation strategy, was approved (PL/19/4430/FA), following completion of a S106 agreement to vary the original PSDF s.106. This scheme provides improvements to Sevenhills Road along with upgrades to the junctions of this road with both Pinewood Road and the A412 Denham Road and replacement of the western most part of the road. Under the PSDF consent Pinewood Studios has the option of which of the two scheme to deliver and has formally notified the Council that it will be the FPR scheme.

- 12.7 The proposed development in full is reliant on both of these schemes being implemented to mitigate the impact on the highways network. This will be secured by planning condition. One of the schemes will need to be implemented prior to any use commencing and the applicant has confirmed that it will be the FPR scheme. The applicant will be required to demonstrate at reserved matters application stage whether the second (SHR) scheme, is required to be completed before occupation of any element of the development and not to occupy that element until it is delivered.
- 12.8 A Transport Assessment (TA) and Framework Travel Plan (FTP) has been submitted in support of the application. The TA concludes that as a result of the proposed highway mitigation strategy, that includes Five Points Roundabout (FPR) and Sevenhills Road (SHR), the traffic impact of the scheme through motorised traffic trip generation will be mitigated, and there will be some improvement in the operation of some of the local network. The TA states in reference to NPPF paragraph 111 that the 'The impact will certainly be well below the 'severe' level that could make the proposal unacceptable in transport terms (as provided by the Framework)'.
- 12.9 Transport has been considered within the Environmental Statement (ES) Chapter 9 Transport, which reports on the outcomes of the assessment of likely significant environmental effects arising in relation to transport. The assessment methodology considers severance, driver delay, pedestrian delay, pedestrian amenity and accidents and safety. In terms of the in combination environmental effects with other existing or approved projects, the other projects which have been considered alongside the proposed development include the Sevenhills Road scheme (PL/19/4430/FA) and PSDF scheme (13/00175/OUT). The transport modelling has also considered:
- High Speed 2 (Construction);
  - M4 Smart Motorways;
  - Heathrow Express Depot;
  - Cemex (Land North of North Park Road) – ref: CM/51/16;
  - Iver Station Car Park – ref: 17/00428/FUL; and
  - Hillingdon Outdoor Activities Centre (HOAC) ref: CM/22/16.



12.10 Construction phase impacts would be mitigated through a Construction Environmental Management Plan (CEMP) and impacts arising from the development mitigated by the highway schemes noted above. A number of minor adverse impacts are reported affecting pedestrians, local communities, drivers and road users but these are not considered significant. A non-significant minor beneficial severance effect for pedestrians / local communities as well as a significant moderate beneficial severance effect for drivers / other road users are also reported. The summary of effects as reported with the ES Chapter 9 Transport: Table 9.10 are set out below.

Effect	Receptor	Residual Effect	Is the Effect Significant?
<b>Construction Phase</b>			
Severance	Pedestrians / Local Communities	Minor Adverse	No
Driver Delay	Drivers / Other Road Users	Minor Adverse	No
Pedestrian Delay	Pedestrians	Minor Adverse	No
Accidents and Safety	All Road Users	Minor Adverse	No
<b>Operational Phase</b>			
Severance	Pedestrians / Local Communities: Pinewood Road and Sevenhills Road	Minor Adverse	No
	Pedestrians / Local Communities: Pinewood Green	Minor Beneficial	No
Driver Delay	Drivers / Other Road Users	Moderate Beneficial	Yes
Pedestrian Delay	Pedestrians: Fulmer Common Road, Pinewood Road and Sevenhills Road	Minor Adverse	No
	Pedestrians: Pinewood Green	Minor Beneficial	No
Pedestrian Amenity	Pedestrians	Minor Adverse	No
Accidents and Safety	All Road Users	Minor Beneficial	No

12.11 The in-combination assessment of transport effects identifies that with the inclusion of additional flows on the network, there will still be a direct permanent long-term effect which is considered to be moderate beneficial and significant on driver delay. The positive impacts in journey time are expected to be seen along the A412 corridor and roads adjoining it resultant from reductions in queuing and delay as a result of the implementation of the entire mitigation scheme. In this context reductions in queuing are experienced at Five Points and the mini roundabouts at Bangors Road/Thornbridge Road.

12.12 The application seeks to provide access to the site via four points. There is a Left In/Left Out arrangement from and onto the A412 Uxbridge Road, located between the most easterly of the existing laybys and the first residential property. This impacts an existing layby, necessitating re-provision of parking spaces (to be secured as part of any permission). The remaining access points are proposed to be simple priority junctions spaced along Pinewood Road, as follows:

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

12.13A total of 2,341 car parking spaces are indicated in the parameter plans (PP7 Development Numbers and Yield). For the visitor attraction, 1,400 spaces are proposed taking account of the sustainable transport strategy to achieve a sustainable mode share of 50%. For the film studio production area, 715 car parking spaces are proposed based on experience in relation to both Pinewood and Shepperton Studios. Cycle provision, including lockers and changing rooms, and bus parking are also to be provided on site.

12.14The provision for sustainable travel set out in the FTP includes augmenting the operation of the shuttle bus services by PGL from Pinewood Studios to nearby stations, and the provision of a Visitor Attraction coach shuttle bus service connecting with the Elizabeth Line at Slough Rail Station.

12.15The existing Permissive Peace Path from Pinewood Road to Black Park through the site is to be closed and an alternative route provided towards the south of the site, on the same permissive basis.

#### *Vehicular access*

12.16The proposed accesses to the Visitor Attraction from the Uxbridge Road A412 is a Left In/Left Out arrangement and the Highway Authority is satisfied that this can be achieved safely. The existing laybys will need to be re-provided and this will be secured by condition. There are three access points proposed on Pinewood Road and these will be priority junctions spaced along the road. One to the north will serve the new studio production space, business hub and education hub uses. One located in the south will provide direct access into the visitor attraction. The third located centrally will be for use as a service access. These arrangements are considered acceptable.

#### *Parking*

12.17Pinewood Studios is long established at this location and the development seek to build on its success and have presented proposals for parking provision to meet the needs of the various elements of the development while taking appropriate opportunities for non-car access. Within that context the provision allows for the parking requirements of the site to be met without causing impact on the highway. Aligned with this is the high proportion of trips to the Visitor Attraction proposed to be undertaken by sustainable modes which at 50% is of a significant level greater than the normal levels expected from development.

12.18The visitor attraction parking provision of 1,400 spaces is based on a sustainable mode share of 50% of visitors arriving by car and is considered acceptable. The film studio production area provision of 715 car parking spaces is based on provision made at both Pinewood and Shepperton Studios, to meet requirements while taking into account Travel Plan measures to promote sustainable access and the provision

of a shuttle bus service. This is considered acceptable. Cycle provision, including lockers and changing rooms, and bus parking are also considered acceptable.

12.19 In response to concerns raised, the applicant has undertaken a survey regarding parking pressures on Pinewood Green. The Highway Authority has reviewed the results of the parking survey and is satisfied that the results demonstrate that the parking that is taking place on Pinewood Green is not related to the operation of Pinewood Studios. The quantity of proposed parking provision on site to serve the development has been further reviewed and the Highway Authority is satisfied that it has been demonstrated that the spaces are appropriate to facilitate proper operation of the site. It is therefore considered that the development at Pinewood Studios would not result in increased parking in this area.

*Traffic impact assessment*

12.20 The network assessment has been carried out using a series of local junction models in order to assess the impact at each individual junction within the study area. This is the same approach that was used within application PL/19/4430/FA (Sevenhills Road). The Highway Authority is satisfied that the models are representative and appropriately validated. The baseline assessment of the network is presented as 2019, summarised below. The review of the network assessed shows that the predominant existing issues are found along the A412 Church Road / Denham Road corridor through Iver Heath.

Junction	2019 Operation	No development / with FPR	No development / with SHR	With development / with FPR + SHR mitigation
Pinewood Road/Pinewood East access (roundabout)	Below Capacity	Below Capacity	Below Capacity	Below Capacity
Pinewood Road/Pinewood West access (roundabout)	Below Capacity	Below Capacity	Below Capacity	Below Capacity
Pinewood Road/Sevenhills Road (priority junction)	Below Capacity	Below Capacity	Below Capacity ( <i>with new roundabout</i> )	Below Capacity ( <i>with new roundabout</i> )
A412 Denham Road/Sevenhills Road (priority junction)	Over Capacity	Over Capacity	Below Capacity ( <i>with new signals</i> )	Below Capacity ( <i>with new signals</i> )
Pinewood Road / Pinewood Green	Below Capacity	Over Capacity	Below Capacity	Below Capacity
Five Points Roundabout (FPR)	Over Capacity	Below Capacity ( <i>with new signals</i> )	Over Capacity	Below Capacity ( <i>with new signals +SHR upgrade</i> )
A412 Church Road/Thornbridge Road (mini roundabout)	Over Capacity	Over Capacity	Capacity improvements (reduced queueing + delay)	No change compared with 'No development with SHR'
A412 Church Rd/Bangors Rd North /A412 Denham Rd (mini Roundabout)	Over Capacity	Over Capacity	Capacity improvements (reduced queueing +delay)	No change compared with 'No development with SHR'

12.21 Trip generation for each of the proposed uses has been established. The site as a whole will be expected to generate 376 two-way trips in the AM peak and 413 two-way trips in the PM weekday network peaks. Development peaks have also been assessed on the network. Studio production space is the greatest generator of trips on the network in both peaks. The Visitor attraction traffic is distributed through the

day, with a lesser impact on the highway network than is experienced during peak hours. The proposed operational model naturally maintains this trip profile.

- 12.22 At the request of the Highway Authority the applicants have supplied results of a sensitivity test. Specifically this sensitivity test assessed the afternoon school peak. This demonstrated that the impacts of the development are also found to not be severe and less than the impacts demonstrated in the peaks. The Sensitivity test also assessed the network on a more pessimistic mode share. The A412 Church Road corridor is shown in the application to see traffic diverted away from the A412 with the delivery of the Sevenhills Road Scheme and the accompanying signing strategy, however should either of these not be delivered then there will be an increase in traffic flows along the A412 which would negatively affect the pedestrian/cycle and driver experience.
- 12.23 A signing strategy was proposed and included within the permission granted for the application PL/19/4430/FA Sevenhills Road. As part of this application a more substantial signing strategy is proposed covering the local highway network from the M40 Junction 1 to the Studios and the approaches to Five Points Roundabout. This strategy directs development traffic away from the A412 Church Road in Iver Heath and seeks to keep traffic to Pinewood Road and Sevenhills Road. The Highway Authority supports the use of the signing strategy for the direction of traffic. An expanded signing strategy should be secured by condition and should show walking and cycling routes to local services, bus stops and train stations.
- 12.24 The applicants have undertaken sensitivity testing of the network in order to demonstrate the highway impact should the assumptions regarding the mode share prove to be less favourable. The results of this sensitivity test demonstrate that with the proposed mitigation, the junctions within the highway network assessment remain without severe impact, and those that operate over capacity remain less so than the situation without the development and the associated mitigation.
- 12.25 In reviewing the traffic impact, it is demonstrated that there is an increase in traffic through Fulmer village, and whilst not a severe congestion impact, there are a number of areas within the village where modifications to the network can be applied to slow traffic and improve the safety conditions, particularly in relation to the pedestrian experiences as a result of any traffic increases. The applicant has agreed a contribution towards traffic calming schemes within the Fulmer area to be secured through a S106 agreement. The Highway Authority is satisfied in this respect.
- 12.26 Local concerns have been raised regarding highway safety at the A412 /Black Park Road junction. These concerns relate to an existing accident cluster and it is not considered that the proposed development affects this as this route does not see a significant increase in vehicle numbers arising from the development. As such it would not be appropriate to seek mitigation from the applicant. The development actively seeks to direct traffic to other more direct routes on the strategic road network.
- 12.27 The mitigation required to ensure that the development in full is acceptable in highway terms requires the delivery of two significant infrastructure schemes; Five Points Roundabout and the Sevenhills Road schemes. It is essential that the delivery of these schemes is secured in such a way as to ensure that disruption and inconvenience to road users is kept to a minimum, and the Highway Authority has

certainty that the mitigation will be delivered in a timely and appropriate manner. The impact on the network is significant and complex, and made more so when considering the delivery of mitigation due to the effects of rerouting traffic. The delivery of the two schemes (FPR and SHR) and signing strategy is to be secured by condition to secure the delivery of the complete mitigation package in a timely manner through the course of the build out of the development such that the impacts of the development remain acceptable.

#### *Sustainable modes – non-car access*

12.28A detailed Travel Plan (TP) will need to be submitted for each element of the development (Visitor Attraction, Production Studios and Centre Stage). The FTP sets out how the suite of TP's shall fit together and be governed through the TP Steering Group. The Highway Authority is satisfied that the FTP sets out an ambitious and achievable set of sustainable travel targets to be secured for this application to ensure that the impact of development on the local highway network is acceptable. In order to help ensure that the targets are met the applicants and the Highway Authority have agreed a Travel Plan Mode Share Incentive Scheme (MSIS). This provides a mechanism for monitoring the visitor attraction mode share with financial penalties payable should targets not be met. Any such payments are to be used for measures to improve air quality in the local vicinity through sustainable transport measures, up to a maximum value over the life of the MSIS of £750,000. This would be secured by S106 obligations.

12.29 There is very limited public transport provision in the immediate vicinity of the site, and in order to offer a genuine choice of transport modes and maximize sustainable transport solutions, the proposals for bus and coach travel are essential. The FTP and the MSIS are measures and controls that are to be secured and monitored for a limited time period, and any subsequent measures agreed through detailed travel plans at reserved matters would also be subject to monitoring for a fixed duration. Elements such as the bus service to Slough and the studio shuttle buses form a key part of the mitigation relating to this application in securing mode share and therefore the defined impact on the highway network. It is therefore essential that these are secured and maintained for the whole life of the uses on the site.

#### *Walking and cycling*

12.30 In respect of walking and cycling provision it is noted that the environment on the A412 Church Road is not conducive to active travel along this corridor, and as such the Highway Authority proposes that funds be secured towards improvements to encourage increased walking / cycling. It is also noted that there is a pre-existing scheme funded via the PSDF S106 to be implemented between the A4007 and Iver High Street and a scheme to sign walking and cycling routes to the site via Pinewood Green. It is therefore proposed that funds be secured to provide a walking and cycling link between these two schemes along the A412 Church Road. These are appropriate opportunities for sustainable travel as required by paragraphs 110 and 112 of the National Planning Policy Framework (2021). A contribution for these purposes be secured by S106 obligations is agreed.

12.31 The existing Peace Path runs along the southern edge of the existing studio connecting Pinewood Road is to be re-provided to the south of the site as a consequence of the development. It is noted that the existing path is provided at the discretion of Pinewood Studios and can be closed temporarily or permanently at any

time. The applicant has offered a replacement path of equivalent status (discretionary) to the existing but in an improved landscape setting. A contribution of £30,000 has been agreed to allow the Parks Service to create a connecting path within Black Park to link the relocated Peace Path with the established path network within Black Park.

12.32 The proposed re-provision of the 'Peace Path' is illustrated as a U shaped route 612 m long skirting three sides of the car parking at the southern end of the site, approximately 600m south of the existing path entrance on Pinewood Road. Although it is acknowledged that this will be further from Pinewood Green residents, the Strategic Access Officer tends to agree that more residents of Iver Heath would be able to reach Black Park with the proposed siting, even though the New Peace Path is itself longer (612m compared to the existing 472m). The new location is close to the Uxbridge Road from where access to Black Park already exists, albeit not for cyclists and the Uxbridge Road is busier and therefore less pleasant than Pinewood Road. The Strategic Access Officer has advised that the alternative route indicated could be improved by providing an additional link to Pinewood Road, saving 370m of unnecessary north-south walking and cycling, 190m of which is along the Pinewood Road, close to noise and traffic. The applicant has agreed this in principle. It is to be noted that the detailed design of the route will be a matter to be determined through the submission of reserved matters in due course.

12.33 In summary, the Highway Authority is satisfied that the significant impacts from the development on the transport network can be mitigated to an acceptable degree and that appropriate opportunities to promote sustainable transport have been taken and would not result in a severe residual impact on the safety and convenience of the highway network. The Environmental Statement reports that there are a number of minor adverse environmental impacts affecting pedestrians, local communities, drivers and road users. These are not considered significant and accompanied by moderate environmental benefits for drivers and pedestrians/community. The proposals are therefore considered to be in accordance with CS policy CP7 and local plan policies TR4, TR5, TR7, and TR10 and national policy.

## **13.0 Air Quality**

Core Strategy Policies:

Core Policy 13: Environmental and Resource Management

Local Plan Saved Policies:

Policy TR5 - Accesses, Highway Works and Traffic Generation

Policy TR10 - Heavy Goods Vehicles

13.1 Core Strategy Policy 13 Environmental and Resource Management, states that the Council will seek to ensure the prudent and sustainable management of the area's environmental resources by seeking improvements in air quality, especially in the Air Quality Management Area adjacent to the motorways and close to Burnham Beeches SAC. New development will be directed away from existing sources of noise and air pollution to avoid adverse impacts on local communities.

13.2 Saved Policy TR5 Accesses, Highway Works and Traffic Generation, in considering proposals involving a new or altered access onto the highway, works on the highway, the creation of a new highway or the generation of additional traffic the Council will have regard to their effect on safety, congestion and the environment.

- 13.3 The NPPF 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.
- 13.4 NPPF 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”.
- 13.5 The site is located within an Air Quality Management Area (AQMA) and an Air Quality Action Plan (AQAP) has been written to fulfil part of the Council’s statutory duties under the Local Air Quality Management framework. It outlines actions likely to improve air quality in the South Bucks area of Buckinghamshire Council between 2020 and 2030. The primary sources of air pollution are transport related including the motorways (M25, M40, and M4) which pass through the area. An AQMA was declared around the motorway corridors in 2004. In August 2018, due to exceedances of nitrogen dioxide along the High Street and Thorney Lane North and South, Iver was designated an Air Quality Management Area.
- 13.6 Air quality has been considered within the ES Chapter 11, having regard to the impacts of emissions from construction and operational road traffic on NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations at existing sensitive receptors and potential future users.
- 13.7 The impacts of emissions from road traffic associated with the construction phase on NO<sub>2</sub> concentrations at sensitive receptors is assessed as minor adverse to minor beneficial but considered not significant.
- 13.8 The air quality impacts of emissions from road traffic associated with the operational phase on NO<sub>2</sub> concentrations at sensitive receptors is considered significant for some specific receptors, but not significant for the remainder, including in the vicinity of the site around Iver Heath. The receptors where a significant impact could occur are around the junction of the A40 and M40. It is stated that “The A40 / M40 junction is a significant element of the strategic road network, with substantive traffic travelling through it on a daily basis. The proportion that relates to the proposed development is exceptionally small and consequently, whilst the impact is noted as being significant, this is set firmly in the context of a wider pre-existing issue to which the development will contribute marginally”.
- 13.9 The in-combination assessment of air quality effects identifies for the construction phase that, with the inclusion of additional flows on the network, from the proposed peak construction year there will still be a direct temporary medium-term effect which is considered to be minor adverse and not significant on exposure to elevated

pollutant concentrations (emissions from vehicle exhausts). For the operational phase whilst there will be some incremental increases, this is moderate adverse and significant on receptors E34 and E36 located close to the A40/M40.

- 13.10 The Council appointed consultants to review the ES Air Quality chapter. They raised a number of queries which have all been addressed, mainly through clarifications of the technical information submitted. One matter has been addressed through a formal ES Addendum, the submission of an updated plan in respect of air quality (A11.1) to show correct distance bands from the site boundary for construction dust sensitivity assessments. The update does not alter the conclusions of the assessment and the ES. The clarifications and updated submission are considered to address the issues raised satisfactorily.
- 13.11 The recommendations also included that the Local Planning Authority agree that a Dust Management Plan and monitoring to be included in a Construction Environmental Management Plan. It has been agreed that dust mitigation is to be included in a Construction Environmental Management Plan (CEMP), subject to a condition of permission.
- 13.12 A number of air pollution mitigation measures are proposed in the Travel Plan. As set out above, this seeks to promote and target sustainable non car borne access and includes provisions for a visitor attraction shuttle bus connection to Slough Station and augmenting the existing Pinewood Studios shuttle bus for those working and visiting the studios. There are also measures to improve walking and cycling.
- 13.13 A financial contribution is also agreed to be secured via a S106 obligations towards implementation of the AQAP objectives, as contained within the Air Quality Action Plan and Air Quality Actions Feasibility Study to contribute towards mitigating the effects of the development. The Air Quality Action Plan for the Ivers contains a number of measures that should reduce NO<sub>2</sub> concentrations in Iver Parish. The financial contribution agreed is £150,000, which would support the implementation of environmental improvements and walking and cycling initiatives where there would be clear air quality benefits. These improvements to routes between Pinewood studios and the local area, would benefit users of the site, such as employees and students, as well as local residents impacted by the poor air quality.
- 13.14 Exposure to elevated pollutant concentrations arising from emissions from vehicle exhausts is a residual (after mitigation) impact of the development, therefore there is a conflict with local and national policy. However the significant adverse effect is specific to receptors E34 and E36 located close to the A40/M40 junction and the impacts would be mitigated including through a financial contribution secured towards the AQAP objectives, which is consistent with CS policy I3. On balance it is considered that the adverse air pollution effect amounts to limited harm and this is carried forward to the overall planning balance.

## **14.0 Ecology and biodiversity**

Core Strategy Policies:

Core Policy 9 (Natural environment)

Core Policy 13 (Environmental and resource management).

- 14.1 Core Policy 9 Natural Environment, states that the highest priority will be given to the conservation and enhancement of the natural beauty of the Chilterns Area of



Outstanding Natural Beauty, and the integrity of Burnham Beeches Special Area of Conservation. The conservation and enhancement of Burnham Beeches SAC, and its surrounding supporting biodiversity resources, will be achieved through restricting the amount of development in close proximity to the site, and ensuring that development causes no adverse effect on the integrity of the SAC. The policy seeks to conserve and enhance the landscape characteristics and biodiversity resources by not permitting new development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided, resulting in a net gain in Biodiversity.

- 14.2 Core Policy 13 Environmental and resource management, states that new development must be water efficient and incorporate Sustainable Drainage Systems (SuDs) where feasible. Particular regard should be had to maintaining the integrity of Burnham Beeches SAC and seeking improvements in air quality, especially in the Air Quality Management Area adjacent to the motorways and close to Burnham Beeches SAC.
- 14.3 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.
- 14.4 Paragraph 180 a) 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.
- 14.5 Paragraph 182 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.
- 14.6 The application is supported by an Environmental Statement (ES) and Chapter 8 Biodiversity, provides an assessment of the proposed development in relation to the effects it would have on ecology and nature conservation. The area of the ES assessment includes the five-armed Five Points Roundabout, and sections of the A412 Uxbridge Road, A4007 Slough Road, Pinewood Road and Wood Lane, the access and highways improvements required to deliver the proposed development.
- 14.7 The ES Ecology chapter has been updated as part of the ES Addendum submitted in October 2021. This followed a formal (Regulation 25) request for further information considered necessary to properly assess the likely significant effects of the proposals

on protected species and habitats, including Bechstein bats and breeding birds. The new and updated surveys submitted are now considered to bring the ecological understanding of the site up to a level where potential impacts can be assessed.

14.8 It is noted that all construction and operation effects have been scoped out for great crested newt, hazel dormouse and invertebrates, with justification for this provided and accepted. It is stated that ecological input has been provided from the onset of the project to ensure impact avoidance and mitigation is in-built to the proposed scheme, including establishing an area of Green Infrastructure of no less than 9.5ha as part of the parameters plan. This will ensure that the Proposed Scheme achieves Biodiversity Net Gain (BNG) of not less than 10%. Mitigation of construction related impacts will include the development and application of an Ecological Lighting Scheme (ELS), CEMP and landscape buffers at the boundaries. The mitigation of the development (operational phase) is addressed below.

#### *Sites of importance*

14.9 The site is located near to the following statutory environmental designations:

- Burnham Beeches Special Area of Conservation (SAC), located approximately 6.0km north-west of the Site;
- Black Park Site of Special Scientific Interest (SSSI) and Black Park Local Nature Reserve (LNR), located approximately 0.3km west and immediately adjacent to the north-western boundary of the Site respectively;
- Kingcup Meadows and Oldhouse Wood SSSI, located approximately 1.5km northeast of the Site;

14.10 In addition the site is near to the following non-statutory designations:

- South Bucks Heaths and Parkland Biodiversity Opportunity Area (BOA) within footprint
- Colne Valley BOA located 1.3km North-east

14.11 Burnham Beeches SAC, is located more than 5km from the site and consideration has been given to effects in relation to changes in air quality from increased construction and operational road traffic. The TA confirms that increases in traffic in proximity to the site will be negligible. Likewise recreational impacts, typically associated with increased populations through residential development and typically within 5km, are considered negligible. These matters have been scoped out of the ES and this approach is considered reasonable.

14.12 The site is adjacent to the Black Park SSSI and Local LNR. There is currently an informal permissive path (Peace Path) that connects the site to Black Park, which will be replaced as part of the proposed development. There is the possibility that sensitive ecological features (such as heathland habitats) could be disturbed should recreational trips from the site increase. The ES states that such trips can be well managed through typical visitor management measures such as signage, path maintenance and ranger presence. Secondary mitigation reported in the ES includes a financial contribution to management of recreational pressures within Black Park. A financial contribution to management of recreational pressures within Black Park, is proposed as part of a S106 Planning Agreement. The ES states 'Through the application of the secondary mitigation measures described above, the predicted increase in recreational visits to Black Park above the current baseline would expect

to be mitigable. The residual effect would therefore be negligible (not significant)'. Black Park within which the SSSI and LNR are located is itself a visitor attraction managed by the Council's Parks Service. It is not considered that there is a high risk of the impacts identified as being possible, particularly as it is not highly likely that additional visitors arising from the development would have dogs accompanying them. The mitigation measures identified and for which funding has been agreed are based on advice from the Council's Ecology and Parks management teams and are considered appropriate.

14.13 Due to an increase in operational vehicle flows in proximity to the Kingcup Meadows and Oldhouse Wood SSSI, which lies within 200m of the A412 and approximately 1.5km to the northeast of the site, there is the potential for a decrease in air quality in this locale. Taking into account the predicted additional traffic in-combination with other plans and projects, air quality modelling has been completed to assess the effects of road traffic emissions on the SSSI (reported in ES Chapter 11: Air Quality, and Appendix 8.6: Air Quality Assessment). The effect of changes in air quality on Kingcup Meadows and Oldhouse Wood SSSI as a result of road traffic increases on the A412 would be negligible. This effect is not significant.

14.14 The site lies within South Bucks Heaths and Parklands BOA which sets local conservation objectives, including the provision of lowland dry acid grassland, lowland meadows, ponds, woodland and hedgerows. It is stated that the proposals create a mosaic of habitats of principal importance and will provide BNG of not less than 10% and will therefore contribute towards meeting the BOA objectives. The habitats created on site will be managed throughout the lifetime of the scheme to maximise their long-term benefit for biodiversity. This will be implemented via a Landscape and Ecological Management Plan, secured and implemented through appropriate planning condition. The above mitigation will provide a significant (minor) beneficial effect at the Local level for Local Conservation Objectives. The Colne Valley BOA is considered sufficiently distanced to avoid the development affecting its associated biodiversity targets.

14.15 Natural England have no objection to the application subject to appropriate mitigation being secured.

#### *Bats*

14.16 Bat surveys identified that the northern tree line, which stretches from Black Park to Pinewood Road, represents a key feature for foraging and commuting bats, including the rare Bechstein bat, which breeds within tree roosts in the adjacent Black Park. A Bat Mitigation Strategy has been submitted and has identified a number of proposed primary mitigation measures, focussed on: increasing the extent of bat foraging and commuting habitat, including retention of the Peace Path corridor and the creation of buffer zones; sensitive lighting within buffer areas; provision of bat boxes and roosting features; and, timing and location of construction activity.

14.17 The ES reports that primary mitigation proposed will ensure that the northern tree line / Peace Path route, together with other tree lines within the site, is protected during construction and operation of the development. This will ensure that impacts of associated noise, lighting and dust will be avoided through sensitive design. The proposed Parameter Plans have been amended to incorporate required mitigation for bats. This includes an increase in the extent of planting / green infrastructure along the current Peace Path route which has been widened from 30m to 50m to

support its use as a movement corridor for bat activity (principally in support of the Bechstein Bat population that exists in Black Park). The Parameter Plan identifies dark zones along the Peace Path commuting route and the edge to Black Park reflecting advice in the supporting Framework Lighting Strategy in recognition of the sensitivity of bats to night time artificial light, in particular.

- 14.18 The ES states that the provision of habitat creation and management will permanently increase the quality and extent of optimal bat foraging and commuting habitat for bats. It is also stated that the Bechstein bat population will be monitored regularly throughout the operation of the scheme to provide a residual feedback loop to ongoing site operations and management both within the site and the wider Pinewood Estate. Monitoring information will be shared with Black Park and the Council to ensure wider landscape management is appropriately informed. The monitoring will be specified and secured by appropriate planning condition. The ES concludes that “The provision of primary mitigation will result in a significant beneficial effect at the Site level for bats during the operational phase as a result of change in availability and quality of habitats (minor beneficial effect)”.
- 14.19 The Bat Mitigation Strategy states that alongside the proposed mitigation measures, opportunities for enhancement have been identified. It is stated that these are not necessary to respond to the proposed development itself, but represent an opportunity to improve bat habitats beyond the current baseline. The measures identified include woodland management of Black Park Country Park; and improving lighting within the existing Pinewood West Studio site. The ES states: The application of the additional enhancement measures detailed above has the potential to increase the significance of benefits to bats.
- 14.20 Regarding Woodland management in Black Park Country Park, the ES advises that the woodland within Black Park is not of high suitability to support the existing Bechstein bat population. The ES highlights a predominance of conifer and presence of rhododendron as being notable, with the more preferable oak, being shadowed and set within an immature area of mixed planting. It is recommended that some thinning of the woodland to support the oaks, particularly those close to the core roost areas, would be of benefit and would help improve the colony’s viability. A financial contribution towards mitigation measures within Black Park has been agreed and can be applied to Woodland Management measures
- 14.21 Regarding Improved lighting in Pinewood West, it is reported that the existing lighting design within Pinewood West is creating light spill onto the woodland within Black Park. The supporting Framework Bat Mitigation Strategy states ‘ With modification and the implementation of a more ecologically sensitive design, this will notably reduce the level of light intensity, light spill and undesirable illumination of the woodland edge.’ The applicant has stated that PGL is committed to addressing this issue independently of SHUK and note that with improvements to the existing security lighting, in particular, it will be possible to deliver a significantly enhanced lighting environment for the existing bat population, delivering further enhancement beyond that which SHUK itself will deliver. A condition of permission to secure a detailed lighting study and strategy to mitigate the cumulative effect of the proposed development and the existing development on the Bechstein bat population, is proposed.

14.22 The primary mitigation for bats will be secured through adherence to the Parameter Plan, and the Bat Mitigation Strategy and Framework Lighting Strategy will be taken forward to inform the detailed design of SHUK, through future reserved matters applications. Conditions of permission will require an Ecological Management Plan (EMP) to be submitted in support of the reserved matters to further illustrate how the bat mitigation measures will be integrated into the development.

#### *Badgers*

14.23 Disused badger sets and used latrines and snuffle holes have been identified around the edge of the site. As their signs have been identified on site but there are currently no identified setts, it is appropriate for further surveying to be carried out prior to commencement to inform mitigation (and if this proves necessary licencing) requirements. This is recognised within the ES: The most appropriate mitigation will be refined by further survey and would be ensured by a pre-commencement planning condition, which outlines the requirement for the survey and a mitigation strategy as required. Standard mitigation measures will be acceptable and can be secured by condition.

#### *Breeding birds*

14.24 The development will result in permanent loss of 23ha of habitat within the 34.4ha site. The ES reports that the condition of these habitats is considered poor and the effect prior to secondary mitigation is considered to represent a significant minor adverse effect for general breeding birds at the site. The loss of grassland habitat will result in the permanent irreversible loss of nesting red listed bird species (Birds of Conservation Concern (BoCC)) including skylark and lapwing. The ES reports that these populations of ground nesting birds are considered of ecological importance at the Local scale and this effect cannot be mitigated on a like-for-like basis on site because the scheme design cannot incorporate the provision of the open spaces they require.

14.25 It is stated that habitat retention and creation will perform a minor role in contributing towards mitigating construction effects on breeding birds. Secondary ecological protection mitigation measures through construction will also be deployed, however they cannot mitigate for the loss of skylark and lapwing on a like-for-like basis. Because the site will permanently lose suitable nesting habitat for these species, a significant adverse effect at the Local level is predicted for skylark and lapwing (Minor adverse effect). The ES states: Following the application of secondary mitigation the residual effect to the breeding bird population assemblage will be negligible (not significant) because the loss of skylark and meadow pipit territories will be balanced by the provision of nesting habitat for a range of other species of equal conservation importance as part of the construction phase, including, but not limited to, mistle and song thrush, house sparrow, starling, swift, and spotted flycatcher. The ES concludes that following implementation the provision of primary mitigation (habitat creation and management) and enhancement through the provision of bird boxes, will result in a significant minor beneficial effect at the local level for breeding birds.

14.26 Breeding bird surveys confirmed important species and habitats. The ES assessment is that disturbance and change in the sites constituent habitats will result in significant adverse effects on breeding birds (Skylark and lapwing). This effect is of minor adverse significance prior to secondary mitigation. The ES has not included

mitigation for these species and reported a residual significant adverse effect. This is not considered acceptable. At least three pairs of lapwing and one pair of skylark (priority species as red listed Birds of Conservation Concern (BoCC)) were recorded nesting within the site. This should require similar compensation to that which was secured for the PSDF permission (13/00175/OUT) e.g. which included green roofs. The loss of one priority species cannot be compensated for by providing for others which are not present on the site. Compensation must be provided for the same species. In this regard a financial contribution to be secured by S106 agreement for the creation of offsite habitat to compensate for the BoCC species adversely impacted by the development has been agreed with the applicant.

### *Reptiles*

14.27 A large population of slow worm and low populations of grass snake and common lizard are present. For slow worms the study area is therefore considered to support a very small, but viable, population of a nationally important species, and is likely to be important for the maintenance of the local meta-population. Mitigation and enhancement measures can be designed into the scheme, this can be secured by condition.

14.28 The Ecologist is satisfied that Natural England licensing is not required for protected species. There are no GCN on site and so no licencing for them is required. Bats are roosting in trees on site but as their known roosting places are not going to be disturbed there is currently no need for a licence. However, as bats are highly mobile, there is a chance that they could move to new roost locations prior to works commencing, therefore it is proposed to condition the carrying out of further surveys where necessary before works which affect potential roost sites is undertaken. Following that there could be a need for a licence to be sought. Likewise with badgers, a condition of permission will require further surveys before works which could affect badgers and there could be a need for a licence to be sought.

### *Biodiversity Net Gain (BNG), Habitats*

14.29 The proposed scheme commits to provide a minimum Biodiversity Net Gain (BNG) of 10%. This will be principally delivered through retention of trees and the green infrastructure boundary that will surround and traverse the site. This will contribute to the local conservation objectives of the South Bucks Heaths and Parklands Biodiversity Opportunity Area and provide benefits for habitats, which are considered beneficial and significant. The provision of this habitat will permanently increase the quality and extent of habitats for bats and breeding birds on the site, which are also considered to be beneficial and significant (ES Non Technical Summary 4.22).

14.30 Through the detailed design and implementation of the development a minimum 10% BNG will be delivered. This will be secured by appropriate conditions. It is noted that the Environment Act 2021 has provision to require all development deliver a minimum 10% gain, but this requirement is not yet in force.

### *Mitigation summary*

14.31 Objections to the proposals include on grounds that insufficient evidence has been provided on the impact of the development on sensitive areas nearby and to justify the 10% BNG. Officers are satisfied that the ES and ES Addendum including updated surveys bring the ecological understanding of the site up to a level where potential impacts can be assessed. While there are some areas where more detail would be

desirable to consider at this stage, it is considered that it will be possible to secure appropriate details through conditions.

14.32 Construction of the development will result in temporary noise, vibration, dust and lighting that may cause disturbance to protected species present on the site. These include bats, badgers, breeding birds and reptiles. At the same time, construction will result in the temporary loss of some suitable habitats for these species. Mitigation measures proposed include pre-construction surveys; programme/timing of activities e.g. outside of breeding seasons; supervision of works by an Ecological Clerk of Works; and retention of valuable habitats. A Construction Environmental Management Plan (Biodiversity) (CEMP) to be submitted and approved in writing prior to commencement and subsequently followed, is to be secured by condition.

14.33 Conditions will need to ensure that design, then construction, and ultimately maintenance and monitoring, is correctly dealt with. A section 106 agreement will also be needed to address impacts beyond the boundaries of the site. Mitigation measures to be secured through conditions and obligations include:

- Expanded new green corridors which enhance the functional connectivity for bats
- Lighting controls and dark zones drawn up in conjunction with an ecologist who is experienced in mitigating against impacts on bats
- Biodiversity net gain of a minimum of 10%,
- Detailed habitat creation/planting plans and specifications.
- Ecological enhancement measures for the creation of homes for reptiles, nesting birds, barn owl and small mammals.
- A Habitat/Landscape and Ecological Management Plan which secures longterm management (and associated funding) of onsite habitats, this will also include ongoing monitoring and reporting. This will also show how areas which will be managed exclusively for wildlife e.g. the existing Peace Path green corridor will exclude access for all except those who are managing and monitoring it.
- A detailed reptile mitigation strategy.
- An updated badger survey immediately prior to commencement with mitigation strategy and licensing requirements is necessary.
- An agreed funding package to mitigate against negative recreational impacts upon the designated sites in Black Park.
- Measures to enhance conditions for Bechstein's bats within Black Park.
- A lighting study and strategy to mitigate the cumulative effect of the proposed development and the existing development on the Bechstein bat population.
- Compensatory roosting sites for sky larks and lapwing.

14.34 The scale of development is such that it will result in ecological impacts and a number of significant adverse impacts have been identified through the Environmental Assessment. Overall it is considered that the proposed development on this site is possible whilst also avoiding, mitigating and compensating for impacts on protected, priority and notable species and habitats. The proposals are therefore considered to be in accordance with CS policies CP9 and CP13 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

## **15.0 Climate change and building sustainability**

Core Strategy Policies:

Core Policy 8 Built and Historic Environment

Core Policy 12 Sustainable energy

Core Policy 13 Environmental and Resource Management

Sustainable Construction SPD 2015

- 15.1 Core Policy 8 - Built and Historic Environment, states new development should be designed to help tackle the causes of, and be resilient to the effects of climate change. Core Policy 12 - Sustainable Energy, requires developments to secure at least 10% of their energy from decentralised and renewable or low-carbon sources. Core Policy 13 - Environmental and resource management, states that the Council will seek to ensure the prudent and sustainable management of environmental resources by, amongst other measures, promoting best practice in sustainable design and construction. It requires new development to be water efficient and include Sustainable Urban Drainage Systems, protect and enhance water quality, seek improvement in air quality and minimise noise impacts.
- 15.2 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.
- 15.3 In March 2020 SBDC was subsumed into the new local unitary authority Buckinghamshire Council along with Buckinghamshire County Council which declared a climate emergency in September 2019.
- 15.4 The application is supported by an Environmental Statement (ES) and Chapter 10 Climate Change, reports the outcome of likely significant effects arising from the proposed development in relation to climate change and how these effects can be mitigated. The application also includes a Sustainability Statement setting out a commitment to sustainable development.
- 15.5 The ES identifies that a likely significant effect is the release of GHG (greenhouse gas) emissions arising from the construction and operation of the development as well as from associated transport. The emissions that arise as a result of the proposed development have been assessed against UK carbon budgets as well as for the SBDC and Buckinghamshire administrative areas in 2018. The likely effects are reported as minor / negligible and are not significant.
- 15.6 A range of mitigation has been incorporated into the design to ensure it is resilient to changes in the future climate.
  - during the design phase an assessment will be carried out of the embodied carbon of new buildings to identify potential materials and measures to reduce the embodied carbon.
  - during the construction phase, the principal contractor will be responsible for the production of a Site Waste Management Plan (SWMP) in order to reduce general construction waste arisings



- a Construction Environmental Management Plan (CEMP) will be provided to manage general environmental related effects during the construction phase.
  - The Proposed Scheme will incorporate energy efficiency and carbon reduction measures e.g (100% low energy (LED) lighting; low carbon heat pumps where heating is required; and
  - be designed to deliver 10% of the site's energy through low carbon renewable energy
- 15.7 An ES Addendum submitted in October 2021 includes a response to concerns raised as to whether a worst case scenario had been assessed in respect of the impact of GHG emissions, with specific reference to operational traffic movements associated with the visitor attraction. The ES recognises that the proposed development will generate additional vehicle trips on the local road network and states that it is not generally possible for current traffic models to estimate net GHG emissions effects from such traffic movements. This is due to the challenge of identifying with any accuracy the proportion of such trips that are wholly additional, and the proportion that are simply trips relocated from elsewhere as a result of the Proposed Scheme. Given this current challenge, GHG emissions from operational vehicle movements have not been estimated.
- 15.8 The ES Addendum clarifies that the assessment set out within the ES has been prepared in full accordance with the relevant (IEMA) guidelines and that a quantitative approach should not be used where there is inadequate or unreliable data upon which to base an assessment. In determining whether traffic movements are 'new', the consideration is not whether such movements will exist, it is whether they only exist as a consequence of the development. Movements that would have taken place anyway are not new. Visitors who would have undertaken a trip to an alternative attraction, or were already on the network (for example holiday makers or on a day trip) do not generate additional GHG emissions simply because they have chosen to visit this attraction or destination (in preference to another). The correct approach would be the growth in the overall tourism market and not the additional traffic movements of the development itself. It is accepted that it is not possible to accurately estimate GHG emissions associated with traffic.
- 15.9 Notwithstanding transport emissions have not been identified as a significant impact in the Environmental Statement, the measures proposed aimed at reducing transport related emissions, include:
- Provision of visitor attraction shuttle bus services from Slough rail station
  - Car parking provision based on the proposed modal mix (effectively capping the number of visitors who can attend the attraction by private car)
  - Use of a ticketing system which can encourage bus and coach travel and minimise traffic generation
  - Provision of fast electric (EV) charging points on 5% of the parking spaces with a further 5% passive provision to allow future installation of EV charge points.
- 15.10 It is noted that other measures include electric cycle charging provision, bike lockers and changing facilities to encourage sustainable transport modes. There can be secured by condition.

- 15.11 The Sustainability Statement sets out a summary of how the development intends to deliver sustainable development. This includes the social and economic benefits of the proposals, the design measures, and commitments on how the development will mitigate and adapt to climate change. In terms of sustainable design PGL is voluntarily targeting a 'Very Good' rating as a minimum across the proposed development where buildings are conducive to a BREEAM assessment.
- 15.12 In terms of energy efficiency, it is stated that the detailed design of the development will consider a range of measures to reduce energy consumption and carbon emissions. This will include consideration of low carbon and renewable energy sources, overheating assessments, energy monitoring and reducing emissions through construction. The Sustainability Statement at 5.9 states 'Where feasible, the mandatory number of credits required for an 'Excellent' rating will be met for operational energy performance using a 'fabric first' strategy which considers passive design and efficient building services. This target reflects PGL's aspirations to go beyond best practice.'
- 15.13 It is stated that detailed design will give consideration to the use of measures to reduce onsite water consumption through construction and operation, and a Materials and Waste Management Strategy will consider measures to minimise material use and manage waste. A Site Waste Management Plan (SWMP) will be prepared setting out the principles for handling, disposing of and managing waste during construction, confirming targets for the reuse and recycling of waste, and diversion of waste from landfill. These details will be required to support the reserved matters applications.
- 15.14 In terms of energy efficiency, the Sustainability Statement outlines a Be Lean, Be Clean and Be Green approach and sets out considerations for renewable and low carbon technologies which are to be considered at detailed design stage. The energy strategy summary within the Sustainability Statement includes a commitment to develop the strategy further at detailed design stage. It is recommended that an Energy Strategy to be secured by condition supplements the detailed planning application/s at reserved matters stage. This should fulfil the requirements as set out in the Sustainable Construction SPD and set out how relevant planning policies from both the SPD and the Core Strategy will be fully achieved.
- 15.15 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 with the details for approval at reserved matters stage. Therefore it is considered that the proposals comply with relevant local policies CP8, CP12 and CP13 and national planning policy in respect of climate change and low carbon infrastructure and energy use.

## **16.0 Flood risk and drainage**

Core Strategy Policies:

CP13 Environmental and resource management

- 16.1 Core Policy 13 Environmental and resource management, states that new development must be water efficient and incorporate Sustainable Drainage Systems (SuDs) where feasible.

- 16.2 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 appropriate, applications should be supported by a site specific flood risk assessment (paragraph 167) and when determining applications LPAs should ensure that flood risk is not increased elsewhere. 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).
- 16.3 A Flood Risk Assessment (FRA) & Drainage Strategy has been submitted in support of the application. Water Resources, Flood Risk and Drainage have been scoped out of the Environmental Statement. The basis for scoping out is that outlined risks associated with construction would be managed by 'best practice' and implementation of a CEMP. It is stated that the surface water drainage scheme will be designed such that there is no increase in the peak rate of run off from the site. It was concluded that surface water flood risk resulting from the development is unlikely to be considered significant. As surface water will discharge to the public sewerage network, a reduction in surface water quality resulting from the development is unlikely to be considered significant.
- 16.4 The site is located in Flood Zone 1, and at the lowest risk of flooding. Parts of the site lies in an area of high risk of surface water flooding. The groundwater level in the area of the proposed development is such that there is a risk of flooding to subsurface assets but surface manifestation of groundwater is unlikely.
- 16.5 A surface water drainage scheme will be developed at the detailed design stage and subject to reserved matters approval. The FRA suggests that due to the previous / existing use, infiltration as a means of surface water disposal is not recommended due to contamination concerns. However, infiltration based SuDS could be used in the northern parcel of the site. The next most practicable method of surface water disposal is via a watercourse. Following engagement with the applicant's drainage consultant, the location of surface water disposal has been revised, showing five sub-catchments across the site. It is intended to use four sub-catchment outfalls to manage surface water runoff from the site and discharge to nearby watercourses. This is in line with the drainage hierarchy subject to infiltration as a means of surface water disposal being demonstrated to be unviable at detailed design stage following infiltration rate testing in accordance with BRE 365 and groundwater monitoring.
- 16.6 It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Attenuation will be provided in strategic swales and permeable paving across the site as shown on the Masterplan 1 Proposed Drainage Layout (drawing no. MP1-3021) and Masterplan 2 Proposed Drainage Layout (drawing no. MP2-3071). The submitted technical note includes indicative storage requirements for both of the proposed masterplans. The proposed storage volume provided is in excess of the required storage volume at this stage.
- 16.7 The outlined approach is considered acceptable in principle and can be developed at detailed design stage and subject to approval at reserved matters stage. The LLFA has no objection to the proposed development subject to planning conditions. The applicant is encouraged to provide attenuation storage using multiple SuDS techniques that offer additional benefits such as water quality, biodiversity and

amenity and that this approach is carried forward to detailed design. The Indicative Drainage Details (drawing no. SK-3100) show the typical design details for the proposed SuDS techniques, these principles should be carried through to detailed design. There is an opportunity to incorporate small scale SuDS within the proposed parking areas, these include rain gardens and bio-retention areas, this can assist in diversifying the landscape and introducing additional green-blue infrastructure within the site.

- 16.8 A water quality assessment has been provided to show that a range of SuDS techniques are required to sufficiently manage pollution from the surface water runoff generated by the proposals. Further investigations, such as groundwater monitoring, should also take place prior to detailed design. These requirements can be secured by conditions. The development is considered to comply with the relevant flood risk policy CP13 and the NPPF.

## **17.0 Ground Conditions, Minerals Safeguarding**

Minerals and Waste plan

Policy 25: Delivering high quality restoration and aftercare

- 17.1 Policy 25 of the adopted Buckinghamshire Minerals and Waste Local Plan 2016 – 2036 provides support for high quality restoration and aftercare of mineral extraction sites.
- 17.2 The 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.
- 17.3 The application site is a former quarry in the process of remediation and subject to Environment Agency (EA) Environmental Permits. The land has been used for the extraction of minerals /disposal of (inert) waste by landfill. The quarry has not yet been fully restored and is not out of aftercare. There is an approved restoration scheme for the land and the proposed development would result in the loss of the approved restoration scheme and any benefits (such as the re-instatement of agricultural land, tree planting etc.) it would deliver.
- 17.4 In support of the application, a Desk Study Review, Preliminary Risk Assessment and Ground Investigation Scoping Report has been submitted. Ground conditions and contamination have been scoped out of the Environmental Statement. The site has been subject to mineral extraction with subsequent landfill, via Environmental Permitting. A review of permitting has established that fill has been largely inert and risks associated with dust generation, ground gasses, contamination of controlled water and mobilisation of contaminants through excavation are considered to be low. It is not considered that contamination will result in significant effects.
- 17.5 The EA initially objected to the proposed development because they were not satisfied that sufficient information had been supplied to demonstrate that the applicant had fully considered their requirements for the surrender of the Environmental Permits on the site prior to development. They subsequently withdrew their objection, having engaged in constructive discussions with the applicant and Buckinghamshire Council and are now satisfied that the applicant has

given due consideration to the existing environmental permits on site, and the risks posed by the proposed development to vulnerable groundwater and the landfill mass.

- 17.6 The EA has confirmed that they are satisfied that the risks posed by the proposed development to groundwater and the landfill mass can be managed through their permitting regime and advise “As environmental regulators we have to ensure that planning and permitting, although separate regimes, can be complimentary where we have complex applications which affect both regimes. We are now satisfied that the risks to the environment posed by the development are best considered through an environmental permit application to amend the final land use and the landfill infrastructure. There may be design requirements which result from this application but these can be integrated into future reserved matters applications. We request that we are consulted on any amendments to the outline application and all reserved matters”.
- 17.7 The Council’s Environmental Health (Contamination) Officer has reviewed the Desk Study Review, Preliminary Risk Assessment and Ground Investigation Scoping Report prepared by Card Geotechnics Limited (Report ref. CG/38624/R001), which has identified a number of potentially complete contaminant linkages. An intrusive investigation is therefore considered necessary. The environmental consultant has prepared a scope for the proposed investigation. The EHO recommends conditions be applied to any permission granted to secure this and where necessary to minimise risks from land contamination. The development is considered to be policy compliant.

## **18.0 Environmental assessment matters**

Core Strategy Policies:

Core Policy 6 (Local Infrastructure Needs)

Core Policy 13 (Environmental and resource management)

- 18.1 The Environmental Statement has scoped out a number of topics as it was judged that there would be no significant environmental effects arising from the development in terms of these specific areas. The evidence to support scoping out of environmental technical topics is provided within Appendix 2.1 of the ES. Matters scoped out included: Agricultural Land; Archaeology; Built Heritage; Water Resources, Flood Risk and Drainage; Lighting; Risk of Major Accidents and/or Disasters; Materials and Waste; and Ground Conditions and Contamination. Only Agricultural Land, Risk of Major Accidents and/or Disasters and Waste are not dealt with elsewhere in this report, and these topics are addressed below. Consideration of Alternatives and Cumulative Effects are addressed in this section.
- 18.2 The ES has considered primary and tertiary mitigation prior to undertaking the assessment of likely significant effects. Following the conclusion of effects based on the proposed scheme any further mitigation measures or monitoring arrangements i.e. secondary mitigation, have been identified. The mitigation measures are summarised as an appendix to this report.

### *Agricultural Land*

- 18.3 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 NPPF 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.

- 18.4 The site is comprised of approximately 32.6 ha of recently restored / in the process of being restored agricultural land. Post 1988 Agricultural Land Classification data identified the site to be a mixture of Grade 3a and 3b land, the majority being Grade 3b. Of these grades, only Grade 3a is classified as best and most versatile (BMV) agricultural land. The site has since been used as a quarry for mineral extraction and been partly restored to agricultural land. The proposed development would result in the loss of the agricultural land. Defra guidance recommends consultation with Natural England if the loss of BMV land is over 20ha. Considering the agricultural land is restored and previously did not comprise over 20ha of BMV land, it is not considered that the threshold is met and the loss of BMV land is not considered to be a significant environmental effect and not considered further in the EIA or reported in the ES.
- 18.5 The development would result in the loss of some BMV agricultural land but not to a significant extent and given the former quarry use this loss would only be afforded very limited negative weight in the planning balance.

#### *Waste*

- 18.6 The production of waste and disposal as landfill has been scoped out of the ES as it is considered unlikely to be significant. The ES Appendix 2.1 states 'At this scoping stage the specific types and amounts of these and other materials is not known within the Proposed Scheme. However, it is assumed that as part of the detailed design of the Proposed Scheme, a Materials and Waste Management Strategy ..... will act as a robust tertiary mitigation measure. The effects of consumption of materials are unlikely to be considered significant and will not be considered within the ES. As part of the detailed design and subject to Reserved Matters approval, a Materials and Waste Management Strategy will be required to mitigate the adverse effects associated with the consumption of materials during construction, and with the operational phase. This will be dealt with by permission.

#### *Risk of Major Accidents and/or Disasters*

- 18.7 The EIA Regulations have a requirement to consider the risk of major accidents and/or disasters relevant to the proposed development. Given the nature of the proposed development and the site context there is not considered to be any likelihood of a major accident or disaster.
- 18.8 Risks associated with major accident caused by ground subsidence and structural/building collapse will be mitigated through adherence to design standards and regulations. Risks arising from fire, arson or vandalism will be reduced through appropriate design and appropriate emergency planning and people management plans in accordance with appropriate Health and Safety legislation.

#### *Consideration of Alternatives*

- 18.9 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) studied 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’.
- 18.10 The applicant states that alternative sites have not been considered as the opportunity to deliver the proposed development only exists at the site, with geographical connection to Pinewood Studios. The ES at Chapter 5 states ‘The components of the Proposed Scheme tie it to the existing film studio, where there can be a direct interrelationship with its intellectual and commercial presence and advantage taken of the skills, opportunities and facilities present within Pinewood Studios, in light of this context. The main design alternative considered was for varying scales and mixes of the visitor attraction and production studio floorspaces. Two design layout options are allowed for, with the difference being the layout of the visitor attraction. Only effects in relation to landscape and visual receptors are influenced by the options.
- 18.11 The EIA assesses the likely significant effects, based on a deviation from the baseline environment, in essence the ‘Do Nothing Scenario’. The ES at Chapter 5 states ‘Each of the technical Chapters 6 – 12 report the future baseline scenario under a ‘do nothing’ scenario. The discussion is associated with how the site and study area may change assuming the site was not developed and the existing conditions/regime was maintained.’
- 18.12 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. The consideration of alternatives is therefore considered acceptable. It is accepted that having regard to the development as a whole there are no alternative sites on which the development could be sited given the need for juxtaposition with Pinewood Studios.

#### *Cumulative Effects Assessment*

- 18.13 To accord with the EIA Regulations, the interaction of environmental effects, and the combination of environmental effects of the proposals with other existing or approved projects, have been addressed. It is concluded within the ES that the in-combination effects with other projects will not be greater than the effects reported alone in the ES technical chapters. Where relevant in-combination and cumulative effects have been addressed within the relevant part of this report.

### **19.0 Infrastructure and developer contributions**

Core Strategy Policies:

CP6 (Local infrastructure needs)

Local Plan Saved Policies:

T4 (New built development to provide tourist facilities)

- 19.1 Core Policy 6 states that the Council will use obligations where appropriate to secure provision of essential infrastructure directly and reasonably related to the development. Any agreement would be subject to having regard to the statutory

tests for planning obligations in the Community Infrastructure Levy Regulations and the National Planning Policy Framework.

- 19.2 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 following measures are required to be secured within a section 106 agreement in order for the proposed development to be acceptable.

*Travel Plan Provisions*

- 19.3 Measures to secure Travel Plans for each element of the development to support sustainable travel; the appointment of a Travel Plan Co-ordinator and a monitoring contribution for reviewing and supervising the implementation of each Travel Plan for each element of the development.

*MSIS Provisions*

- 19.4 The Modal Share Incentive Scheme (MSIS) to encourage sustainable travel and that no more than 60% of Visitors to the Visitor Attraction arrive by car. If the MSIS target is not achieved over the review period then an incremental and escalating financial contribution, to promoting sustainable transport related to improved air quality on traffic routes impacted by the development, is required to be paid, with the total contribution payable by to the Council not exceeding £750,000.

*Black Park Link Provisions*

- 19.5 A contribution of £30,000 towards the cost to the Council of providing the Black Park Link, to connect the relocated Peace Path with the established path network in Black Park.

*Mitigation of Recreational Impact Provisions*

- 19.6 A contribution of £100,000 to be paid to the Council as a contribution towards a strategy to mitigate the effects of visitors to the site upon Black Park.

*Bat mitigation: Woodland Management Contribution*

- 19.7 A financial contribution of £40,000 to fund Woodland Management measures within Black Park to improve the habitat for Bechstein bats.

*Breeding Bird Compensatory Habitat contribution*

- 19.8 A financial contribution of £20,000 for the creation of offsite habitat to compensate for the BoCC species adversely impacted by the development.

*The Sustainable Transport Contribution Provisions*

- 19.9 A contribution of £150,000 towards the costs of implementing measures to promote the use of sustainable transport by visitors to the Visitor Attraction and/or visitors to the Film Production Facilities, the need for which arises directly from the Development.

*The Air Quality Management Contribution Provisions*

- 19.10A contribution of £150,000 towards the costs of implementing measures aimed at the improvement of air quality in the AQMA.

*Traffic Calming in Fulmer Provisions*



19.11A contribution of £150,000 as a contribution towards the costs of implementing measures to calm traffic flows and ease traffic congestion in Fulmer in the vicinity of the site.

*Education Hub and Business Growth Hub Provisions*

19.12 To make the land available at nil cost for the development of the hubs and to support the developer/s throughout the planning process until the approval of all Reserved Matters in respect of the hubs.

*Local Economic Benefits Provisions*

19.13 Measures:

- to deliver a construction apprenticeship scheme to be operated through the building contracts
- to provide a National Film and Television School (NFTS) bursary scheme
- to provide a Schools Outreach Programme of film and media learning support in education at primary, secondary and tertiary education levels to be delivered at the site
- to prioritise employment opportunities for local people
- to prioritise opportunities for local businesses to supply goods and services

19.14 The following is a summary table:

	<b>Contribution</b>
<b>1. Travel plan</b>	
a. Visitor attraction buses	Cost of works
b. uplift capacity Pinewood shuttle buses	Cost of works
c. bike lockers	Cost of works
d. e-bike charging	Cost of works
e. Travel Plan implementation & monitoring	Cost of works and monitoring costs
<b>2. Modal Share Incentive Scheme</b>	Up to £750,000
<b>3. New Peace Path</b>	Cost of works
<b>4. Connection within Black Park</b>	£30,000
<b>5. Mitigation of impact on Black Park</b>	£140,000
<b>6. Breeding bird compensation</b>	£20,000
<b>7. Sustainable transport contribution</b>	£150,000
<b>8. Air quality contribution</b>	£150,000
<b>9. Traffic calming Fulmer</b>	£150,000
<b>10. Centre Stage</b>	To make land available on implementation of an agreed hub scheme by operator/ developer
(a) Education hub	
(b) Business growth hub	
(c) Planning support	
<b>11. Local economic benefits</b>	
a. NFTS bursaries of £15,000 x 5pa for 5 yrs	Costs at £75,000 pa up to £375,000

b. apprenticeship programme £2,000 pa for 10 local people for 5 years	Costs at £20,000 pa up to £100,000
c. salary for part-time scheme co-ordinator	Costs at £15,000 pa for 10 years up to £150,000
<b>12. Schools outreach programme</b>	Cost of £20,000 pa up to £100,000
<b>13. Local employment and service priority</b>	
a. employment priority notification and preference	Costs of £5,000 pa up to £25,000
b. business / supplier priority notification + preference	Costs of £5,000 pa up to £25,000

19.15 The applicant has confirmed that it is willing to enter into a legal agreement.

19.16 A number of objections have cited inadequacy of S106 contributions and identified other measures that should be secured in mitigation or as compensation. It is considered that such requirements would need to accord with The Community Infrastructure Levy (CIL) Regulations 2010. Regulation 122 places into law the Government's policy tests on the use of planning obligations. It is now unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development of this nature if the obligation does not meet all of the following tests: necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

19.17 In the context of this application the development is in a category to which the regulations apply. The requirement for all of the above named measures being sought, if the proposals were to be supported, would need to be secured through a Planning Obligation Agreement and this is assumed in the planning balance. These are necessary and proportionate obligations that are considered to comply with the tests set by Regulation 122 for which there is clear policy basis either in the form of development plan policy or supplementary planning guidance, and which are directly, fairly and reasonably related to the scale and kind of development.

19.18 Officers are satisfied that the obligations set out secure the mitigation necessary and otherwise in accordance with the legal requirements and guidance. Other measures suggested in representations do not meet the rigorous tests in the CIL Regulation of being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

## 20.0 Other matters arising from representations

20.1 A number of matters have been raised in consultation responses which are addressed here.

### *Insufficient time to respond to additional information*

20.2 The comment has been made that it is unreasonable to expect residents to fully digest the added documents within the consultation timeframes. The deadline should be extended by at least one month, or more if new documents keep being added as they are now. On this basis, process for comment does seem skewed in favour of

SHUK, whereby they have continued to add significant documents during the consultation period, making it incredibly challenging and time consuming for residents to provide a fully informed response in the time given.

- 20.3 Response: There has been a 30 day statutory consultation period following receipt of the ES Addendum. Information received from the applicant following that and within the consultation period does not constitute additional or new information and does not warrant extension of the consultation period.

*Further evaluation by of the ES Addendum*

- 20.4 Noting that the Council engaged specialist consultants (Temple) to review the Environment Statement the comment has been made the Temple should have been asked to review the ES Addendum. A specific question has been asked as to whether the concerns raised by Temple in regard to Air Quality have all been resolved. A general criticism is made that the ES is defective.
- 20.5 Response: Temple were retained to augment Council capacity when the application was submitted and in consideration of the broad scope of the Environmental Statement submitted. Given the limited scope of the ES Addendum the Council did not require Temple's support in reviewing this.
- 20.6 In relation to the air quality, the ES Addendum (Appendix 9) clarifies that all responses to the concerns raised by Temple apart from number 28 (relating to Construction Dust mapping) were judged acceptable by Temple. Item 28 recommended that Figure A11.1 needs to be updated so that distance bands around the southern end of the site are correct. This update was subsequently provided as ES Addendum Appendix 13 Air Quality Construction Dust Assessment. This is considered acceptable.
- 20.7 In response to the criticism that ES is defective, officers are satisfied that the ES including the ES Addendum adequately meets the statutory requirements.

*BPA Pipeline*

- 20.8 The proposed works are in close proximity to 2 high-pressure fuel pipelines and BPA wish to ensure that any works in the vicinity of the pipeline are carried out in accordance with their safety requirements. BPA have advised that they wish to request that the application is held in abeyance until they have discussed the proposal in more detail with the developer. They have also requested an informative that the owner/developer must liaise with BPA and gain their consent for any construction within the pipeline easements before the site works commence. They advise that the proposed ponds running along the western boundary of the site must be kept outside of the pipeline easement and their presence must not prevent BPA from being able to gain access to the pipelines in future (e.g destabilising a parallel excavation).
- 20.9 Response: The Council agrees that the requested informative is included in any consent. It is not considered necessary to hold the application in abeyance pending discussions with the applicants. The pipeline has been taken into account in the proposals and detailed consideration of BPA's requirements can inform the detailed design to be considered at reserved matters stage. It is noted that BPA did not responds to the initial consultation on this application.

*Gardens Trust*

- 20.10 The Trust advises that in their previous response, they specifically requested that the applicants commission a Heritage Impact Statement to address concerns about the impact of the proposals upon locally significant Heatherden Hall and Black Park and Grade II Registered Langley Park. They advise that in the absence of such a document, their objection remains.
- 20.11 Response: Officers are satisfied that we have sufficient information and appropriate consideration has been given to heritage assets as set out in section 11 of this report.

## **21.0 Overall Balance and Conclusion**

- 21.1 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.
- 21.2 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.
- 21.3 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 the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation). The application provides for three principal elements, the Visitor Attraction, The Productions Studios and the Education and Business Hubs (Centre Stage) as well as Green Infrastructure. The facilities would 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.
- 21.4 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.
- 21.5 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.

### *Planning Balance:*

- 21.6 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, 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; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 21.7 There are relevant development plan policies that apply to this application. Those policies which are most important for determining this application are Core Policies 7, 9, and 10 and Saved Local Plan policies GB1, GB4, EP3, EP4 and TR5 . Policy GB1 is

not fully consistent with the NPPF in that it does not correspond entirely with the categories of inappropriate development and there is no reference to very special circumstances, and to that limited extent is not up to date. This also applies to policy GB4. However, the principal thrust of the policy which is to attach strong protection to the Green Belt from inappropriate development remains consistent with Government policy and up to date. Overall the suite of development plan policies is considered to be up-to-date. Thus the tilted balance in paragraph 11d) of the NPPF is not engaged and the S38(6) balance followed. Even if it were, footnote 7 of the NPPF applies and in the absence of the demonstration of very special circumstances, the NPPF itself would provide a clear reason for refusing planning permission and the tilted balance would not apply. Where the necessary very special circumstances case is demonstrated, by definition the harms of a development are clearly outweighed by its benefits and, even were the titled balance to be applied, logically it would add nothing to the case in favour of permission.

- 21.8 The NPPF sets out in paragraph 147 that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'Very Special Circumstances'. Paragraph 148 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt and that 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."
- 21.9 Development should be regarded as inappropriate in the Green Belt except in specified exceptions as set out in NPPF Paragraph 149 (a – g). Saved Local Plan policy GB1 similarly identifies categories of development that may be considered appropriate. The proposed development does not fall within any of the exceptions listed in paragraph 149 or policy GB1. The proposals are therefore inappropriate development based on this paragraph of the NPPF and contrary to policy GB1.

#### *Green Belt and other harm*

- 21.10 Green Belt: The proposed development would constitute inappropriate development and will result in spatial and visual harm to the openness of the Green Belt. It will result in significant urbanising development and encroachment into the open countryside and the loss of 32 ha of land restored / being restored to agricultural use. In addition, the proposals will lead to a conflict with three out of the five purposes of including land in the Green Belt. The proposal would not accord with policy GB1 of the Local Plan and the NPPF. The harm to Green Belt openness is substantial and this is afforded substantial weight.
- 21.11 Landscape: The scale and extent of the development is such that there will be a significant moderate adverse effect as the character of the site will fundamentally change and the open setting to Black Park across the site will be largely lost resulting in localised harm to the character of the site and this part of the CVRP and LCA. There would also be significant minor to moderate adverse impacts on a number of views in the short term until planting has matured to screen the development. For the residents at Royal Lodge / Park Lodge there will be permanent significant moderate – major adverse visual impact. Views across the site from Black Park will be impacted, including to Little Coppice. In attributing weight to this harm it is noted that very few properties are affected, the effects are not all significant and where they are they are

localised and not all permanent. Overall this harm is afforded moderate negative weight.

- 21.12 Residential amenity: The development would have a transformative effect on the setting of a small number of residential dwellings and result in harm in terms of outlook, noise and possible disturbance. These impacts would to an extent be mitigated through the detailed design process, by landscaping and environmental controls to be secured by condition. There would be some residual amenity effects on this small number of dwellings but the scale and nature of those effects coupled with the small number of dwellings affected is such that this impact attracts only limited weight in the overall balance.
- 21.13 Air pollution: The site is within an Air Quality Management Area. Exposure to elevated pollutant concentrations arising from emissions from vehicle exhausts is a detrimental impact of the development. However the significant adverse effect is specific to receptors E34 and E36 located close to the A40/M40 junction and the impacts would be mitigated including through a financial contribution secured towards the AQAP objectives. On balance it is considered that the adverse air pollution effect amounts to limited harm and this is attributed limited weight.
- 21.14 Heritage: The harm arising from the impact on the setting of the heritage assets is considered to be at the lower end of 'less than substantial harm'. This is to be weighed against the public benefit arising from the development and given great weight in accordance with the NPPF paragraph 199.
- 21.15 Agricultural land: The proposed development would result in the loss of the approved restoration scheme and re-instatement of agricultural land. The loss of agricultural land cannot be mitigated. Given the previous quarry use and the limited extent of BMV agricultural land the loss is not significant and can only be afforded very limited *negative weight in the planning balance*.

#### *Benefits*

- 21.16 The benefits centre on the national significance of what is proposed in terms of developing the strengths of Pinewood Studios in UK film production and delivering a complimentary nationally significant visitor attraction, both delivering a substantial economic benefit. The proposals take advantage of the global asset and anchor institution of Pinewood, realising significant benefits to the national, regional and local economy. The expansion of studio space meeting demand will aid local, regional and national recovery. The visitor attraction will significantly boost tourism and aid the visitor economy in the county and region. The benefits are very significant and clearly align with local and national economic growth and recovery strategies.
- 21.17 The applicant has set out material considerations to justify the proposed development, and which would comprise very special circumstances to justify a grant of planning permission, these are:
1. The geographically fixed location of Pinewood Studios (there is not a choice of location)
  2. The implementation of Government/LEP approved Industrial Strategy
  3. The economic benefits in support of economic recovery predominantly new employment, retraining/reskilling, growth of the local economy, tourism boost
  4. The enhancement of arts, culture and tourism

5. The environmental benefits, predominantly a significant gain in ecological asset and biodiversity and furtherance of Colne Valley Park objectives
6. The social/community benefits, opportunity for shared facilities and extensions to permissive path network

21.18 The geographically fixed location of Pinewood Studios: The opportunity to deliver a growth hub is considered to be a specific opportunity given the existing studio, together with its worldwide reputation that creates an opportunity that cannot be replicated elsewhere. The creation of a visitor attraction seeks to build on this geographic connection.

21.19 The provision of additional floorspace for film production represents an expansion of existing capacity at Pinewood, whilst also creating an opportunity to deliver a working film studio that has a relationship with the visitor attraction. Further film production space would respond to the substantial demand that exists in both the West London Cluster and at Pinewood itself. The scale of the additional floorspace is significant (capable of accommodating the production of a large 'blockbuster' scale movie).

21.20 The business and education hubs are also reasonably locationally tied to the existing film studio and to each other. Centre Stage is a multi-functional hub that would provide education/business growth and community uses/accommodation (in a way that is complementary to other local initiatives and investments).

21.21 The proposed Screen Hub UK is considered to be strongly related to the specific Pinewood site/location. This is a significant positive benefit.

21.22 The implementation of Government /LEP approved Industrial Strategy: The proposed Screen Hub UK would be consistent with national and local industrial strategy and help meet the demand for screen-based content production in the UK. The proposal is consistent with the industrial and recovery strategies and economic priorities of HM Government and Buckinghamshire LEP. The growth hub can also be seen to support the LEP recovery strategy, in response to economic challenges associated with Covid and Brexit.

21.23 A development of the scale and type proposed has the potential to bring substantial economic benefits directly and indirectly and locally to nationally. Pinewood is already one of the leading employers in Buckinghamshire and its expansion provides a further opportunity to deliver high value jobs in a sector that is both stable and open for continued growth. In addition, the visitor attraction will open up opportunities for a broader range of skills and roles, many of which relate to sectors where unemployment growth has been significant. The level of job creation and wider suite of economic benefits is very significant. This is a very significant positive benefit.

21.24 The economic benefits in support of economic recovery predominantly new employment, retraining/reskilling, growth of the local economy, tourism boost: The economic benefits arising from the scheme are substantial. The scheme would be one of the largest in Buckinghamshire in recent times at £450m and the potential for job creation and growth in the economy at local and national level in a priority business sector is considerable (c. 3,500 jobs and a GVA contribution of £230m pa). Positive impacts on social wellbeing derive from the economic benefits. These benefits are very significant.

- 21.25 The enhancement of arts, culture and tourism: It is accepted that Pinewood's contribution to arts and culture in the UK is substantial in retaining, supporting and expanding all of the elements that go into film production. The proposed development will make a direct contribution to culture and the arts and there are wider benefits both regionally and nationally associated with the creation of an international visitor attraction. This adds further appeal to the UK as a destination for overseas visitors, whilst also adding weight to the cultural and tourism capital that already exists. This is a significant benefit.
- 21.26 The environmental benefits, predominantly a significant gain in ecological asset and biodiversity and furtherance of Colne Valley Park objectives: The ES reports significant benefits in terms of biodiversity net gain (minor beneficial), habitats (moderate beneficial), bats (minor beneficial) and breeding birds (minor beneficial). The proposed 10ha of green/blue infrastructure is a benefit than can be attributed weight but 10% BNG reflects the minimum that will be required when the Environment Act 2021 comes into force and needs to be reflected in the weight to be attributed as a benefit of the scheme. Limited weight is therefore attributed to this factor.
- 21.27 The social/community benefits, opportunity for shared facilities and extensions to permissive path network: As part of the proposed development the applicant proposes a range of related community benefits. A number of these relate to Centre Stage (shared use of the 'hub building accommodation and services, and workspace opportunity within the building). It is stated that there would be opportunity for community engagement and partnership activities e.g. film screenings, school visits, careers advice and fairs, volunteering, working with the Pinewood Community Fund. However the delivery of Centre Stage is dependent on others, Pinewood will make the land available but there is no certainty it would come forward. The opportunities would be beneficial however the weight to be attributed to this would be tempered by the fact that the business and education hubs (Centre Stage) are not secured and their delivery is uncertain.
- 21.28 A number of benefits are to be secured as planning obligations, including NFTS bursaries, an apprenticeship programme and a schools outreach programme. These can be attributed positive weight.
- 21.29 In overall summary this development is of national significance in terms of developing the strengths of Pinewood Studios in UK film production and delivering a complimentary nationally significant visitor attraction, both delivering a significant economic benefit. The proposals take advantage of the global asset and anchor institution of Pinewood, realising significant benefits to the national, regional and local economy. The expansion of studio space meeting demand will aid local, regional and national recovery. The visitor attraction will significantly boost tourism and aid the visitor economy in the county and region. The benefits are very significant and clearly align with local and national economic growth and recovery strategies. These are attributed very significant weight. The proposed Screen Hub UK is considered to be strongly related to the specific Pinewood site/location. This is attributed significant positive weight. The contribution to culture and the arts is attributed significant weight. Environmental benefits to BGN is afforded limited weight and community benefits are afforded very limited weight.

*Green Belt Very Special Circumstances Conclusion and Overall Conclusion*



21.30 In considering the very special circumstances balance, officers have concluded that all of the harms are clearly outweighed by the benefits. 'Very Special Circumstances' do exist in this case. It is considered that other material considerations substantially outweigh the conflict with the development plan. Had it been appropriate to apply the tilted balance, there would have been no clear reason for refusal on this ground under paragraph 11(d)(i) of the NPPF. In consequence officers have concluded that, subject to the recommended conditions and the completion of a section 106 agreement securing the necessary obligations that planning permission should be granted.

*Working with the applicant / agent*

21.31 In accordance with paragraph 38 of the NPPF (2019) 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.

21.32 The Council worked with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents regularly of any issues that arose in the consideration of their application.

## **22.0 Recommendation**

That the application is delegated to the Director of Planning and Environment for APPROVAL subject to: referral to the Secretary of State to consider whether to call-in the planning application on Green Belt grounds; and, the recommended planning conditions and the satisfactory completion of an agreement under s106 of the Town and Country Planning Act (as amended) in relation to the Planning Obligations broadly in accordance with the details set out in the main body of the report or if a satisfactory S106 Agreement cannot be completed, for the application to be refused for such reasons as the Director of Planning and Environment considers appropriate.

Subject to the following conditions:-

### **A. Reserved matters and Implementation**

C1 Approval of the details of the:

Reserved matters

- layout;
- scale;
- appearance; and
- landscaping

relating to each element or part of the proposed development (the 'reserved matters') shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of that element or part of the development.

The development shall be carried out in accordance with the approved details.

Reason: This is an outline permission granted in accordance with the provisions of Article 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

C2  
Implementation The first application for approval of reserved matters shall be made to the Local Planning Authority no later than 3 years from the date of this permission. The relevant elements of the development are:

- the Visitor Attraction;
- the film production buildings;
- the education hub; and
- the business growth hub

The development shall be begun before the expiry of 2 years from the date of the first approval of reserved matters.

Reason: In order to comply with the provisions of the Town and Country Planning Act 1990 (as amended) and to reflect the scale of the development.

C3  
Implementation Application for approval of the reserved matters in respect of all subsequent elements or parts of the development hereby permitted shall be made to the Local Planning Authority before the expiration of 10 years from the date of this permission.

Reason: In order to comply with the provisions of the Town and Country Planning Act 1990 (as amended) and to reflect the scale of the development.

C4  
Approved plans The development shall be carried out in accordance with the approved plans, listed below:

- Site Location Plan 3770-FBA-XX-00-DR-A-01\_100
- A412 access ITL16184-GA-002D
- Pinewood Road accesses ITL16184-GA-007B, ITL16184-GA-005B and ITL16184-GA-006B

Reason: For the avoidance of doubt and in the interests of the proper planning of the area and to ensure satisfactory principal points of access.

C5  
Approved plans  
and documents

The development shall be carried out in substantial accordance with the approved amended parameter plans and documents listed below:

- PP1A or B Site Context Plan 3770-FB-XX-00-DR-A-01-120 Rev P1 and 3770-FB-XX-00-DR-A-01-121
  - PP2 Development Zones 3770-FB-XX-00-DR-A-01-122 Rev P2
  - PP3A or B Land Use 3770-FB-XX-00-DR-A-01-123 Rev P3 and 3770-FB-XX-00-DR-A-01-124 Rev P3
  - PP4 Green Infrastructure 3770-FB-XX-00-DR-A-01-125 Rev P3
  - PP5 – Access and Movement 3770-FB-XX-00-DR-A-01-126 Rev P1
  - PP6A or B Building Heights 3770-FB-XX-00-DR-A-01-127 Rev P2 and 3770-FB-XX-00-DR-A-01-128
  - PP7 Development Numbers and Yield 3770-FB-XX-00-SC-A-01-000 Rev P3
- 
- Framework Travel Plan dated 1 February 2021
  - The design principles set out in the Development Framework and Design and Access Statement,
  - Landscape Strategy
  - Arboricultural Report
  - Framework Bat Mitigation Strategy
  - Framework Lighting Strategy
  - The Summary of Mitigation Measures set out in Chapter 14 of the Environmental Statement September 2020 as amended by Addendum (October 2021).

For the avoidance of doubt and in reference to the parameter plans referenced above PP1A or B, PP3A or B, PP6A or B only one layout option A or B shall be implemented, that option shall be identified on submission of the first reserved matters application for any element or part of the Visitor Attraction development.

Reason: For the avoidance of doubt and in the interests of the proper planning of the area and to ensure a satisfactory form, layout, scale, appearance and landscaping and to comply with the Environmental Statement and Addendum.

C6  
Maximum  
Floorspace

For each element or part of the development no more than the maximum floorspace set out in Parameter Plan PP7 Development Numbers and Yield shall be constructed on the relevant part of the site.

Reason: For the avoidance of doubt and in the interests of the proper planning of the area and to ensure a satisfactory form, layout, scale, appearance and landscaping and to comply with the Transport Assessment and Environmental Statement and Addendum.

C7  
Orderly  
development

Each reserved matters application shall be accompanied by an updated illustrative masterplan, which provides an up to date context for the development as a whole including subsequent elements or parts of the development and for the determination of that reserved matters application.

Reason: For the avoidance of doubt and in the interests of the proper planning of the area.

C8  
Levels

No works shall take place on any individual element or part of the development until details of the finished floor levels of the buildings and finished site levels (for all hard surfaced and landscaped areas) in relation to existing ground levels within that element or part of the development have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out strictly in accordance with the approved level details and retained in accordance with the same. All reserved matters applications for a building(s) submitted under condition 1 shall include details of existing ground levels, proposed finished floor and slab levels and finished ground levels.

Reason: To accord with the National Planning Policy Framework and to ensure the satisfactory design of the development.

C9  
Materials

All reserved matters applications submitted for a building(s) under condition 1 shall include details of materials proposed for all of the external faces of that building(s) including walling, fenestration and roofing. Sample panels shall be made available at the written request of the Local Planning Authority. No works of construction to a building in each element or part of the development shall take place until the material details for that element or part have been approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved materials.

Reason: To accord with the National Planning Policy Framework and to ensure the satisfactory design of the development.

## **B. Highways**

*Caveat: Committee is advised that there is a difference of opinion regarding the wording of condition C10 and it is not agreed. It is proposed to provide the final agreed wording or otherwise update members by way of a corrigenda on the 16<sup>th</sup> of December 2021.*

C10  
Highway  
improvements

### **Grampian Condition**

i) No development shall commence until a highway works mitigation scheme comprising EITHER the Sevenhills Road highway mitigation scheme ("the SHR Works") OR the Five Points Roundabout highway mitigation scheme ("the FPR Works") has been commenced pursuant to an extant planning permission;

ii) the Sevenhills Road highway mitigation scheme ("the SHR Works") shall comprise the following:

- works to Sevenhills Road from the junction with Pinewood Road to the junction of the A412 Denham Road comprising a 28m inscribed circle diameter roundabout at the Pinewood Road/Sevenhills Road junction;
- a new section of Sevenhills Road to the north of the existing alignment replacing the narrow/single track section;
- minor widening and realignment works to Sevenhills Road;
- road widening and provision of traffic signals at the A412 Denham Road/Sevenhills Road junction;
- a new pedestrian crossing facility at the Pinewood Road/Sevenhills Road junction; and
- changes to the existing highway signage to direct traffic between the A412 north-east and Pinewood studios via the improved Sevenhills Road,

as shown in principle on the following drawings:

ITL 15189-GA-014 revision E

ITL 15189-GA-015 revision E

ITL 15189-GA-016 revision E

ITL 15189-GA-017 revision E

ITL 15189-GA-018 revision E

iii) the Five Points Roundabout highway mitigation scheme ("the FPR Works") shall comprise the highways improvements to the Five Points Roundabout as shown in principle on plan ITL 16184-GA-16 revision D.

iv) No element of the development nor any part of such an element shall be occupied until either the FPR Works or the SHR Works have been completed and are open to traffic.

v) No application pursuant to condition 1 for an element or part of the development shall be submitted unless it includes evidence to demonstrate whether or not both the FPR Works and the SHR Works are required to be completed before occupation of that element or part. The evidence shall include:

- a. a Transport Technical Note (which shall be in general accordance with National Planning Practice Guidance for Transport Assessments and any other scoping that may take place with the Highway Authority) using the traffic survey criteria and testing of those junctions contained in the submitted September 2020 Transport Assessment which are:

- Pinewood Road / Pinewood East access (roundabout);
- Pinewood Road / Pinewood West access (roundabout);
- Pinewood Road / Sevenhills Road (priority junction);
- A412 Denham Road / Sevenhills Road (priority junction);
- Pinewood Road / Pinewood Green (priority junction);
- Five Points Roundabout (FPR);
- A412 Church Road / Thornbridge Road (mini-roundabout); and
- A412 Church Road / Bangors Road North / A412 Denham Road (mini-roundabout);
- Pinewood Road site accesses (priority junctions)

The Transport Technical Note shall assess the local road network using the modelling tools set out in the approved Transport Assessment dated September 2020 and the modelling shall be carried out applying a highway network scenario with the assumption that whichever of the FPR Works and the SHR Works is the first set of highway mitigation works to be carried out is completed and operational and shall assess the year the relevant element or part of the development is intended to be open for occupation and the position in the year ten years on from that date;

b. a review of the expected traffic routing and assignment between the A412 Pinewood Road and the development site which shall be carried out applying a scenario that whichever of the FPR Works and the SHR Works is the first set of highway mitigation works to be carried out has been completed and is operational

c. in respect of the requirements of both a. and b. above the following development scenarios shall be assessed:

- a baseline scenario as set out in the approved Transport Assessment 2020 taking into account the cumulative impact of the implementation of development of all matters approved pursuant to condition 1 up to that date and without whichever set of highway mitigation works (the FPR Works or the SHR Works) has not been commenced upon commencement of construction of the development (hereafter called “the second highway mitigation works”);
- scenarios comprising of the situation:
  - i. as of the date of opening of whichever element or part thereof to which the relevant application pursuant to condition 1 relates; and
  - ii. as of ten years from the date of opening of whichever element or part thereof to which the application pursuant to condition 1 relates

in both cases both without the second highway mitigation works, but with the first set of highway mitigation works to be carried out completed; and with both the SHR Works and the FPR Works completed

vii) The second highway mitigation works shall be carried out and completed in accordance with the details and development triggers determined by the LPA in accordance with the submitted evidence set out above, so that no individual element, or part of an element, of the development necessitating the prior implementation of the second highway mitigation works shall be occupied until the practical completion and opening for public use of both the SHR Works and the FPR Works;

viii) At the latest, the final element or part of the development to be occupied shall not be occupied until the practical completion and opening for public use of both the SHR Works and the FPR Works.

Reason: In the interests of highway safety and convenience to ensure safe and suitable access and to ensure that the development does not result in a severe individual or cumulative impact on the highway network.

### C. Travel Plans and infrastructure

C11 Approval of Travel Plans No element or part of the development as approved shall be occupied until a detailed travel plan has been submitted to and approved in writing by the Local Planning Authority for that element or part. The travel plan shall be in substantial accordance with the Framework Travel Plan document dated 1 February 2021 and referred to in C3 above. The approved travel plan shall subsequently be implemented.

Reason: To ensure that the opportunities for sustainable travel are provided to protect and maintain the operation of the highway network through establishment of traffic patterns and behaviours reflective and representative of those characterised within the Transport Assessment and application documents.

C12 Car Parking & Manoeuvring The details to be submitted for the approval of the Local Planning Authority within a reserved matters application for each element or part of the development, in accordance with condition 1 above, shall include:

- i) The number of car parking spaces to be provided for that element or part of, in accordance with Visitor Attraction Parking note (iTransport dated 16 February 2021) and the parameters set out within the submitted Transport Assessment dated XX and Parameter Plan 7;
- ii) EV vehicle charging provision at a rate of 5% of the parking spaces to be built in that element or part (active provision) and 5% in that

element or part to be infrastructure ready (passive provision) and details of disabled parking provision;

- iii) a scheme for the off street parking of cars, coaches and buses as relevant to that element or part of the development;
- iv) a scheme for the off street manoeuvring, loading and unloading of vehicles relating to that element or part; and
- v) an internal movement plan in respect of pedestrians, cycles, cars, coaches and buses for that element or part.

The approved details shall be implemented (and the approved car, coach and bus parking spaces and manoeuvring, loading and unloading areas, EV vehicle charging provision and disabled parking provision shall be made available for use) prior to the occupation of that element or part of the development to which the approved details relate and thereafter those areas shall not be used for any other purpose.

Reason: To enable vehicles to draw off, park, load/unload and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway, and secure the scale of the parking provision across the site and to ensure that sustainable modes of travel are accessible in accordance with the outline application parameters.

C13  
Cycle  
facilities

The details to be submitted for the approval of the Local Planning Authority within a reserved matters application for each element or part of the development, in accordance with condition 1 above shall be in accordance with the Transport Assessment dated XX, the 'Cycle Facilities Note 12 November 2021', Parameter Plan 7 and shall include details of:

- i) The provision, location and layout of appropriately covered and lit cycle parking in respect of that element or part;
- ii) e-bike charging provision, cycle storage lockers and racks in respect of that element or part; and
- iii) changing facilities and lockers for the storage of personal effects in respect of that element or part.

The development shall be carried out in accordance with the approved details and the approved facilities shall be made available for use prior to the occupation of that element or part of the development and shall be permanently retained thereafter.



Reason to ensure that sustainable modes are accessible and attractive for use in accordance with the outline application parameters.

C14  
Visitor  
Attraction bus  
infrastructure

Works on the Visitor Attraction shall not commence until details of the associated bus infrastructure have been submitted to and approved in writing by the Local Planning Authority, such details to include but not be limited to the following;

- Appropriate bus stops, shelters, seating and timetable provision
- Bus stands to accommodate layovers
- Welfare facilities for bus staff

The Visitor Attraction shall not be occupied or open to visitors until the said bus infrastructure has been provided and is available for use in accordance with the approved details. The approved bus infrastructure shall thereafter be retained.

Reason: To secure that the provision of a high quality accessible bus service of the type and nature set out within the application to achieve the modal share and protection of the highway network.

C15  
A412 parking  
bays

The construction of the A412 principal site access shall not commence until a scheme for the replacement A412 parking bays as shown in principle on drawing ITL16184-GA-015 has been submitted to and approved by the Local Planning Authority and has been implemented and made available for public use in accordance with the approved scheme.

Reason: To ensure the existing layby provision is replaced and provides suitable provision for highway users.

C16  
Servicing

Prior to the commencement of any element or part of the development a Servicing Management Plan in respect of that element or part shall be submitted to and approved in writing by the Local Planning Authority. Each element or part of the development shall not be operated otherwise than in accordance with the approved Servicing Management Plan in respect of that element or part.

Reason: In order to ensure that servicing of the site takes place in a safe and suitable manner, providing protection to the general public from servicing activities.

C17  
Access

Prior to the commencement of development, a programme for and construction details of site access points shall be submitted to and approved in writing by the Local Planning Authority in general accordance with the following access plans :

- A412 access - ITL16184-GA-002D
- Pinewood Road accesses ITL16184-GA-007B, ITL16184-GA-005B and ITL16184-GA-006B

The development shall be carried out in accordance with the approved programme and construction details.

Reason: To Provide safe and suitable access and in order to minimise danger, obstruction and inconvenience to users of the highway and of the development.

C18  
Signage  
Strategy

Prior to any occupation of buildings a Detailed Highway Signage Strategy shall be submitted and approved which shall set out details of (a) how the highways signage for the development will be programmed and implemented by reference to the occupation of different elements or parts of the development; (b) the arrangements to amend the Highways Signage Strategy as required to reflect the phased progress of the development. The strategy shall substantially be in accordance with the scheme shown in principle on Figure 1: Extended Signage Strategy (ref: ITL16184 Rev B) issued on 1 February 2021.

The signage shall be implemented in full accordance with the approved Detailed Highway Signage Strategy.

Reason: To ensure that directional signage is provided to the travelling public presenting the appropriate routes to access the development site using all modes and to reinforce the use of the networks as attributed in the application distributions.

C19  
Permissive path  
(new)

Prior to any closure of the existing Peace Path (as at December 2021) under the terms of this permission, a scheme for provision of a replacement alternative route of equivalent status shall be submitted to and approved by the Local Planning Authority and shall be constructed and made available for use by the public in accordance with the approved details. The scheme shall be in general accordance with the document 'A New Peace Path' (Pinewood, November 2021).

Reason: To replace the existing permissive path with an alternative of equivalent status in the interests of users of the footpath.

## D. Drainage

C20  
SUDS surface  
water on site

No development shall commence until a surface water drainage scheme for the site, based on sustainable drainage principles as set out in Flood Risk Assessment & Drainage Strategy (ref. 1278-01, September 2020, Civic Engineers) and Technical Note (ref. 1278.01, 06.11.2020, Civic Engineers) and including a programme for implementation, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented as part of the development in accordance with the approved details. The scheme shall include:

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

Reason: In order to ensure a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 163 of the National Planning Policy Framework to ensure that there is satisfactory management of flood risk.

C21  
SUDS  
connections

Prior to the commencement of development details of offsite drainage connections relating to the disposal of surface water runoff from the development shall be submitted to and approved in writing by the Local Planning Authority. The details shall include capacity, condition and accompanying offsite drainage plans. The development shall be carried out in accordance with the approved details.

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

C22  
SUDS  
maintenance

Prior to the commencement of development a SUDS whole life maintenance plan shall be submitted to and approved by the Local Planning Authority in writing. The plan shall set out how and when to maintain the full drainage system will be maintained (including a maintenance schedule for each drainage/SuDS component), with details of who is to be responsible for carrying out the maintenance. The plan shall also include as-built drawings and/or photographic evidence of the drainage scheme. The development shall be carried out in accordance with the approved plan.

Reason: In order to ensure long term maintenance of the drainage system as required under Paragraph 165 of the National Planning Policy Framework, for sustainable drainage and the satisfactory management of flood risk.

## **E. Biodiversity and ecology**

C23  
Updated  
Surveys

Prior to the submission of the EDS and CEMP (if after 1st April 2023) updated ecological surveys shall be submitted to the Local Planning Authority for, protected species bats, badgers, breeding birds and reptiles (including newts) in order to inform the content of the EDS and CEMP.

Reason: To ensure that the EDS and CEMP are based upon up to date information about species and appropriate mitigation measures to be provided.

C24  
Ecological  
Design  
Strategy

No development shall take place on any element or part of the development until an ecological design strategy (EDS) in accordance with the ES and ES Addendum and addressing mitigation, has been submitted to and approved in writing by the Local Planning Authority.

The EDS shall include the following:

- a) Purpose and conservation objectives for the proposed works which shall show a minimum biodiversity net gain of 10%.
- b) Review of site potential and constraints.
- c) Detailed designs and/or working methods to achieve stated objectives.
- d) Extent and location/area of proposed works on appropriate scale maps and plans.
- e) Specification and source of materials (plants and otherwise) to be used where appropriate, e.g. native species of local provenance.
- f) Persons responsible for implementing the works.
- g) Provision for wildlife corridors, linear features and habitat connectivity.
- h) Woodland, tree, hedgerow, shrub, wetland and wildflower planting and establishment.
- i) Proposed new landforms associated with habitat creation, e.g. water bodies and watercourses.
- j) Soil handling, movement and management.
- k) Creation, restoration and enhancement of semi-natural habitats.
- l) Species rescue and translocation, reptiles.
- m) Bat crossings for new roads.
- n) Creation of new wildlife features, including but not limited to bird nesting and bat roosting features within buildings and structures, and attached to trees, reptile hibernacula and wildlife ponds.
- o) Provision and control of access and environmental interpretation facilities, e.g. bird hides, paths, fences, bridges, stiles, gates and signs/information boards.
- p) A programme for its implementation.

The EDS for each element or part of the development shall be implemented in accordance with the approved details and all features shall be retained thereafter.

Reason: To ensure that green infrastructure areas are provided in accordance with the outline planning permission and its parameter approvals and to achieve the mitigation set out in the ES.

C25  
Landscape  
and ecological  
management  
plans (LEMPs)

Before each element or part of the development is commenced a landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the Local Planning Authority for that element or part. The content of the LEMP shall demonstrate compliance with the Ecological Design Strategy for that element or part of the development and include the following.

- a) Description and evaluation of features to be managed.
- b) An updated Biodiversity Net Gain Calculation which has regard to the individual element of the development and overall net gain delivery on other elements being delivered across the whole site to achieve an overall biodiversity net gain of 10% minimum

- c) Ecological trends and constraints on site that might influence management.
- d) Aims and objectives of management.
- e) Appropriate management options for achieving aims and objectives.
- f) Prescriptions for management actions.
- g) Preparation of an implementation programme (including an annual work plan capable of being rolled forward over a five-year period).
- h) Ongoing areas of management which will required further consideration in the period from 5 to 30 years after establishment.
- i) Details of the body or organisation responsible for implementation of the plan.
- j) Ongoing monitoring and remedial measures to ensure environmental objectives are achieved.

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

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

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

Reason: To ensure delivery of mitigation and management to achieve biodiversity objectives.

C26  
Lighting  
Reduction  
on the  
wider site

Prior to occupation of any element of the development a lighting assessment shall be submitted to and approved in writing by the local planning authority. The assessment shall:

- . (a) assess the impact of external lighting from the existing baseline of the existing Pinewood development on the woodland edge of Black Park and the existing Peace Path route within the application site;
- . (b) identify recommendations for actions to reduce the lighting impact of the proposed development on the Black Park woodland edge and the existing Peace Path route within the application site (having regard to the impacts identified at (a) above); and
- . (c) include a programme for completion of the actions identified at (b) above.

On each anniversary following approval of the assessment, a notification report shall be submitted to the local planning authority

setting out the actions that have been carried out in accordance with the approved assessment. The final submission of annual notification reports shall be on the anniversary following completion of the final agreed actions as set out in the approved assessment.

Reason: to ensure that the cumulative effect of the lighting of the proposed development mitigates adverse impacts on the Bechstein bats.

C27  
Bechstein bats  
monitoring

Prior to commencement of any element or part of the development a Bechstein bat monitoring plan shall be submitted to and approved in writing by the Local Planning Authority. The monitoring plan shall include: (i) a specification for the monitoring of bats' commute routes across the application site and the Peace Path in particular; and (ii) that part of Black Park adjacent to the site where there are known roosts as identified in the ES Addendum, and (iii) a programme for its implementation. The plan shall be updated annually throughout the implementation of the development and submitted to the Local Planning Authority.

Reason: To monitor the continuing successful use of the principal bat commute route across the site and ensure effective mitigation.

## F. Landscaping and trees

C28

The details of landscaping for each element or part of the development submitted pursuant to condition 1 shall include full details of both hard and soft landscaping works, including an implementation programme, relating to that element or part.

The details shall include:

A) Hard landscape works as a minimum:

- a) Proposed finished levels and/or contours,
- b) Boundary details and means of enclosure,
- c) Noise barriers (a fence and/or earth bund), as required to mitigate noise from the use of the car parks
- d) Car parking layout and materials,
- e) Other vehicle and pedestrian access and circulation areas,
- f) Hard surfacing areas (e.g. surfacing materials) and their permeable qualities,
- g) Minor artefacts and structures (e.g. furniture, seating, refuse or other storage units, signs, lighting etc.)
- h) Proposed and existing functional services above and below ground (e.g. drainage, power cables, communication cables, pipelines, indicating lines, manholes, supports etc.)

B) Soft landscape works as a minimum:

- i) Planting plans
- j) Written specifications (including soil depths, cultivation and other operations associated with plant and grass establishment) and
- k) Schedules or plants noting species, planting sizes and proposed numbers/densities

Details of all trees, bushes and hedgerows which are to be retained

All hard and soft landscaping works shall be carried out in accordance with the approved details, implementation programme and British Standard BS4428:1989 Code of Practice for General Landscape Operations.

Reason: To ensure satisfactory landscaping of the site in the interests of visual amenity.

C29

No individual element of the development shall be occupied until a Landscape Management and Maintenance Plan, including long term design objectives, management responsibilities and maintenance schedules relating to the hard and soft landscaped areas, internal roads, parking areas and verges, for that element, has been submitted to and approved in writing by the Local Planning Authority. The Landscape Management Plan shall be carried out as approved thereafter for the lifetime of the development.

Reason: To ensure successful aftercare of landscaping.

C30  
Landscape  
replacement

Any tree or shrub which forms part of the approved landscaping scheme which within a period of five years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree or shrub of a species, size and maturity to be approved in writing by the Local Planning Authority.

Reason: To ensure satisfactory landscaping of the site in the interests of visual amenity.

C31  
Tree protection

a. Prior to the commencement of any element or part of the development the measures to safeguard the trees, hedges, bushes and vegetation in respect of that element or part, as shown to be retained in accordance with the following documents, shall be carried out:

- Parameter plan PP4 Green Infrastructure 3770-FB-XX-00-DR-A-01-125 Rev P3
- Landscape Strategy (Document 11)
- Arboricultural Report (Document 12)



- b. No works on any element or part of the development shall commence until a written arboricultural method statement, Tree Protection Plan for tree care in respect of that element or part has been submitted to and approved in writing by the Local Planning Authority.
- c. No equipment, machinery or materials shall be used, stored or burnt within any protected area. Ground levels within these areas shall not be altered, nor any excavations undertaken including the provision of any underground services, without the prior written approval of the Local Planning Authority.
- d. Seven days written notice shall be given to the Local Planning Authority that the protection measures are in place prior to demolition and/or approved works, to allow inspection and approval of the works.

The development shall be carried out in accordance with the approved details.

Reason: To ensure trees and hedgerows are not damaged during the period of construction and in the long term interests of local amenities.

## **G. Energy**

C32  
Energy

With each reserved matters application for an element or part of the development an energy strategy in respect of that element or part shall be submitted to and approved by the Local Planning Authority in writing. The strategy shall include details of the provision of at least 10% of energy supply to be sourced from on-site renewable and/or low-carbon sources. The development shall be carried out in accordance with the approved energy strategy and renewable energy plant shall be installed in accordance with the approved details prior to the occupation of the building(s) to which the details relate and thereafter retained.

Reason: To increase the proportion of energy requirements arising from the development from decentralised and renewable or low-carbon sources. (Policy CP12 of the South Bucks Local Development Framework Core Strategy (adopted February 2011) refers.)

## **H. Contamination risk**

C33  
Contamination  
assessment

Prior to the commencement of development (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal

with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

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

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

C34  
Verification  
report

Prior to occupation of each element or part of the development a verification report that demonstrates the effectiveness of any necessary remediation carried out in respect of that element or part pursuant to condition 24 shall be prepared together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval in writing. The approved monitoring and maintenance programme shall be implemented.

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

C35  
Unexpected  
contamination

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

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

## I. Noise

C36  
Noise control

Prior to use/occupation of any building hereby permitted, details shall be submitted to and approved in writing by the Council, of the external sound level emitted from plant/ machinery/equipment and mitigation measures in respect of that building as appropriate. The measures shall ensure that the external sound level emitted from plant, machinery/equipment will be lower than the lowest existing background sound level by at least 5dBA in order to prevent any adverse impact. The assessment shall be made in accordance with BS4142:2014 at the nearest and/or most affected noise sensitive receptors, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out and submitted to the Local Planning Authority where required to confirm compliance with the sound criteria and additional steps to mitigate noise shall be taken, as necessary. Specific consideration shall be given to operation of the backlot. Approved details shall be carried out prior to occupation/use of that building and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/surrounding premises are not adversely affected by noise from plant/mechanical installations/ equipment.

## J. Lighting

C37  
Lighting

No development above ground for any element or part of the development shall commence until a lighting strategy and specification report in respect of that element or part has been submitted to and approved by the Local Planning Authority in writing. The strategy shall be in accordance with the approved Framework Lighting Strategy dated

XX (Document 18) and Framework Bat Mitigation Strategy (26.10.202). The details shall include details of maximum luminance and lights to be erected, location, height, type and direction of light sources and intensity of illumination. The details shall also include details of the lights to be switched off/ and or dimmed at night including times. The approved lighting strategy and specifications shall be carried out in accordance with the approved scheme before occupation of that element or part of the development and thereafter retained. No external lighting other than that approved shall be installed without the prior written approval of the Local Planning Authority.

Reason: To minimise any lighting impacts on biodiversity in particular bats, in the interests of residential amenity and character and appearance of the area.

## **K. Construction management**

### **C38 Construction Traffic Management Plan**

Not to commence works on any element of the development until a Construction Traffic Management Plan (CTMP) in respect of that element or part has been submitted to and approved by the Local Planning Authority in writing. The CTMP shall include details of:

- vehicle routing
- traffic movements (including an estimate of daily construction movements for each element of the development)
- traffic management (to include the co-ordination of deliveries, plant and materials and the disposal of waste to avoid undue interference with the operation of the public highway, particularly identifying sensitive times to be avoided)
- operating times of construction traffic movements
- construction compounds and storage and dispensing of fuels, chemicals, oils and any hazardous materials (including hazardous soils);
- parking, loading and unloading areas
- wheel and chassis cleaning
- mitigation and suppression of dust, vibration, noise and general disturbance (including to residential amenity) and measures to monitor the same
- waste management (including recycling)
- temporary lighting
- risk management and emergency procedures
- hoarding
- before development condition survey of Pinewood Road

The approved CTMP shall be followed and implemented in full during the construction of each element or part of the development to which it relates.

Reason: To ensure the traffic and movement impacts of construction are managed and monitored to maintain safe operation of the highway.

C39  
Construction  
Environmental  
Management  
Plan

Before each element of the development is commenced (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP(Biodiversity)) has been submitted to and approved in writing by the Local Planning Authority for that element or part. The CEMP shall include details of:

- (1) Risk assessment of potentially damaging construction activities;
- (2) Identification of “biodiversity protection zones”, including specific reference to badger, great crested newt, breeding birds and ancient woodland;
- (3) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts on biodiversity during construction (which may be provided as a set of method statements) and biosecurity protocols;
- (4) The location and timing of sensitive works to avoid harm to biodiversity features;
- (5) Contingency/emergency measures for accidents and unexpected events, along with remedial measures;
- (6) Details of drainage arrangements during construction identifying how surface water run-off will be dealt with so as not to increase the risk of flooding to downstream areas
- (7) Responsible persons for managing and monitoring the works and lines of communication;
- (8) The role and responsibilities on site of a qualified ecological clerk of works (ECoW) or similarly competent person, and times and activities during construction when they need to be present to oversee works;
- (9) Measures for removal of invasive species within the site;
- (10) Mitigation and suppression of dust, vibration, noise and general disturbance (including to residential amenity) and measures to monitor the same;
- (11) Use of protective fences, exclusion barriers and warning signs;
- (12) A Soil Resource and Management Plan (in accordance with the DEFRA ‘Construction code of practice for the sustainable use of soils on construction sites (2009)); and
- (13) Measures for on-going monitoring and assessment during construction to ensure environmental objectives are achieved.

The approved CEMP shall be adhered to and implemented in full throughout the construction period for that element or part strictly in accordance with the approved details.

Reason: In the interests of improving biodiversity in accordance with NPPF and Core Policy 9: Natural Environment of the South Buckinghamshire Core Strategy and to ensure the survival of protected

and notable species protected by legislation that may otherwise be affected by the development.

## **L. Archaeology**

C40  
Archaeology

No development shall take place, unless authorised by the Local Planning Authority, until a written scheme of archaeological investigation has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include watching provisions and trial trenching of previously undisturbed ground. The approved scheme shall be adhered to throughout the development.

Reason: To secure appropriate investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 205 and CP8 of the South Bucks Core Strategy (2011).

## **M. Waste**

C41  
Waste

No development shall commence on an element or part of the development shall commence until a Site Materials and Waste Management Strategy for the construction and operational phase of that element or part has been submitted to and approved in writing by the Local Planning Authority. The development shall be constructed and operated in accordance with the approved Strategy in respect of that element or part.

Reason: In the interests of sustainable development.

## **N. Backlot**

C42  
Backlot

Prior to the commencement of use on any Backlot, a Backlot Management plan shall be submitted to and approved in writing by the Local Planning Authority. The Backlot shall thereafter be managed in accordance with the approved Backlot Management Plan in respect of that Backlot. The plan shall include:

- hours of operation
- details of any external lighting
- details of any noise generating plant or machinery
- details of control mechanisms in line with the relevant standards

Reason: To prevent negative impacts upon Bechstein's bats and to ensure that the amenity of occupiers of the surrounding premises are not adversely affected by noise from plant/mechanical installations/equipment.

## Informatives

1. The applicant is advised that prior to construction of the access an agreement pursuant to section 278 of the Highways Act 1980 will be required to be completed. This agreement must be obtained from the Highway Authority before any works are carried out on any footway, carriageway, verge or other land forming part of the highway. A minimum period of 8 weeks is required to draw up the application form. Please contact Highways Development Management at the following address for information: -

Highways Development Management (Delivery team)  
Buckinghamshire Council  
6<sup>th</sup> Floor, Walton Street Offices  
Walton Street,  
Aylesbury  
Buckinghamshire  
HP20 1UY  
[highwaysdm@buckinghamshire.gov.uk](mailto:highwaysdm@buckinghamshire.gov.uk)

For the avoidance of doubt the works referred to in condition 8 shall include any required Traffic Regulation Orders and their costs, streetlighting, communications provision, and any other works required by the detailed design review process to achieve technical approval.

2. Signs proposed on the strategic road network outside Local Authority jurisdiction shall require the approvals from the controlling Authority.

Highway signs shall be in accordance with the Traffic Signs and Regulations and General Directions and require technical approval through an appropriate agreement with the Highway Authority.

The applicant must remove signs from the highway that are no longer required in order to accord with the with the Detailed Signage Strategy in condition xxxx

Additional informatives to be added.

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## **APPENDIX A: Consultation Responses and Representations**

### Councillor Comments

#### **Cllr Luisa Sullivan**

(27.10.20)

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

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

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

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

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

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

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

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

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

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

### **Cllr Paul Griffin**

(26.10.20)

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

(28.10.20)

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

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

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

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

### **Cllr Wendy Matthews**

(13.11.20)

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

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

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

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

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

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

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

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

**CLlr Ray Sangster (ex councillor)**

(22.11.20)

As a Member I formally request a Call-In.

Areas to be discussed are

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

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

**Joy Morrissey MP**

(21.07.21)

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

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

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

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

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

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

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

**Oliver Dowden MP**


Department for  
Digital, Culture,  
Media & Sport

Richard Herbert Dowd CBE MP  
Secretary of State for Culture,  
Media and Sport  
4th Floor  
10 Parliament Street  
London SW1A 2BQ

[WYM.gov.uk@dcm](mailto:WYM.gov.uk@dcm)  
[Pn9uirIB&dPmG99W](mailto:Pn9uirIB&dPmG99W)

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

?- INT2020/19B30/DC  
@ September 2020



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

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

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

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

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

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



Department for Digital, Culture, Media & Sport

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

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

## Parish Council Comments

### **The Ivers**

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

(26.11.21)

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

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

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

### **Bat Mitigation and Biodiversity Proposals**

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

### **Greenbelt development**

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

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

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

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

#### Air Quality Monitoring Area

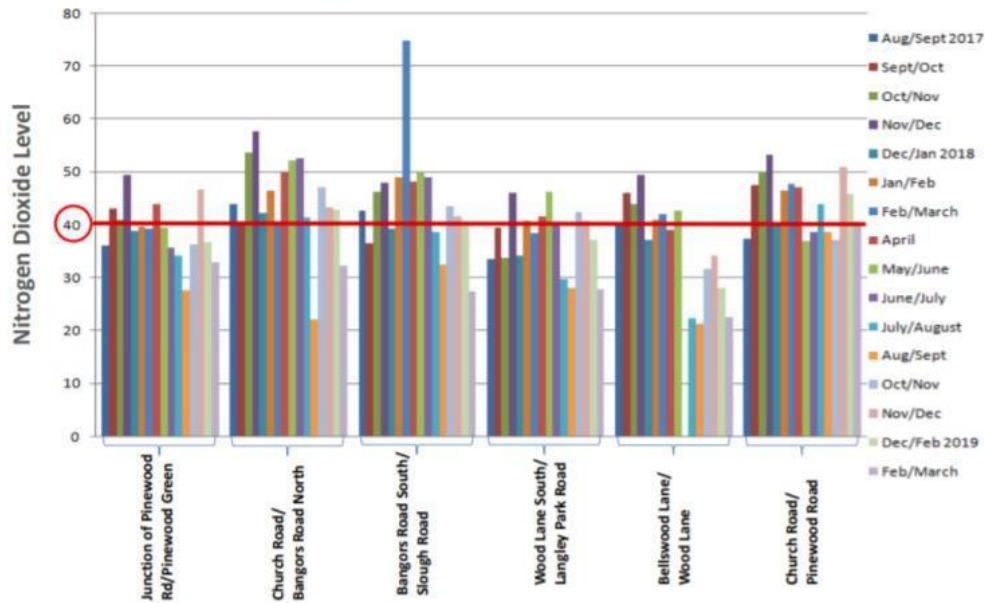
The Ivers Parish area was designated an Air Quality Monitoring Area in 2018. Monitoring of the air quality shows that the levels of NO<sub>2</sub> frequently exceed the maximum permitted level as agreed. In addition, emerging research is showing that these currently agreed levels are significantly too high and should be lowered to 10µg/m<sup>3</sup>. (World Health Organisation (WHO), September 2021.)

This development will degrade air quality throughout the construction and operational phases. It will continue to have a negative impact on air quality via loss of mature vegetation and traffic to site. To illustrate our point regarding existing air quality issues please refer to figure 1 (below), which shows the results of the Iver Heath Residents Association monitoring of air quality (2017 -2019). On many occasions 40µg/m<sup>3</sup> level has been exceeded and on many more occasions this level is nearly reached. Recently monitoring undertaken during Covid-19 lockdown period (April 2020 to April 2021) show that 4 areas still exceed / nearly exceed the 40µg/m<sup>3</sup> threshold. These sites are Junction of Pinewood Road and Pinewood Green; Junction Bangors Road South and Slough Road; Junctions of Church Road and Pinewood Road; Junction of Church Road and Bangors Road North. These areas will be impacted and stressed further as a result of the proposed development.

Applying the WHO recommendation, all sites on all occasions exceed the NO<sub>2</sub> level.



## 4.2 Results: sites with highest monthly readings



© Iver Heath Residents' Association

- 9 -

February 2020

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

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

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

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

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

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



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

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

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

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

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

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

#### Adequacy of consultation

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

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

#### Previous concerns raised by The Ivers Parish Council

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

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

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

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

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

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



Pinewood Green and Pinewood Road May 2021



Pinewood Green and Pinewood Road 22 November 2021 9.30am

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

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

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

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

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

The Ivers Parish Council objects to this application.

(18.11.20)

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

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

*(ONS April-June 2020 16-74yrs*

*UK employment 76.4% unemployment 3.9% inactivity 20.4%*

*SE employment 79.7% unemployment 3.3% inactivity 17.5%)*

#### 1. Green belt

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

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

Clause 133. .... The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Clause 134. Green Belt serves five purposes;

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

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

This application fails on;

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

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

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

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

## 2. Colne Valley Regional Park

The aims of the CVRP are:-

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

This application fails on;

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

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

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

## 3. Excessive traffic generation

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

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

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

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

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

- Traffic
- Poor air quality
- Light pollution
- Noise pollution
- Visual intrusion

5. Reduction in biodiversity

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

6. Design

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

7. Peace Path

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

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

8. Climate change

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

9. Impact on community and residents

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

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

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

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

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

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

10. Traffic Routing Condition

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

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

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

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

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

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

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

11. The development should include:-

Renewable energy provisions.

Electric shuttle buses .

Green roofs on buildings

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

S106 Asks

- Green belt mitigation

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

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

at significantly reduced rates.

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

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

## **Fulmer Parish Council**

(15.11.20)

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

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

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

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

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

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

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

**Wexham Parish Council**  
(26.10.20)

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

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

**Stoke Poges Parish Council**  
(27.10.20)

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



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

## Consultation Responses

### **Natural England**

(23.10.2020 and 23.11.21)

#### SUMMARY OF NATURAL ENGLAND'S ADVICE

#### NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would:

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

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

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

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

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

#### Further advice on mitigation

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

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

#### Other advice

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

### Biodiversity duty

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

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

### Local sites and priority habitats and species

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

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

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

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

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

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

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

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

Should the proposal change, please consult us again.

### **Environment Agency**

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

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

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

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

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

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

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

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

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

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

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

#### Groundwater and Contaminated Land

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

#### Advice to Applicant/LPA

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

In order to protect groundwater quality from further deterioration:

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

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

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

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

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

Further points to note in relation to DQRAs:

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

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

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

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

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

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

#### Deep Borehole Soakaways

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

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

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

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

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

#### G1 - Direct inputs into groundwater

The Environment Agency must take all necessary measures to:

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

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

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

Please refer to our Groundwater Protection webpages for further information.

#### Waste on-site

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

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

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

We recommend that developers should refer to:

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

#### Waste to be taken off-site

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

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

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

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

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

### Water Resources

#### Advice to Applicant

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

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

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

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

### Final comments

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

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

### **Forestry Commission**

27/10/20

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

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

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

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

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

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understory (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

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

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

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

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

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

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

## **BPA Pipelines**

(29.11.21)

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

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



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

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

The most important points are:

These Pipelines carry refined petroleum at extremely high pressure.

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

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

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

Nominal cover is only 0.9m (3').

Normal vertical clearance for new services is 600mm.

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

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

Tree planting is prohibited within the easement.

No buildings can be located within the pipeline easement.

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

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

Utility crossings may require a formal crossing consent

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

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

A confirmed or proposed programmed start date for the works

A detailed description of the proposed works

A plan of the work area,

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

### **Buckinghamshire Highways DM**

(06.07.21)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(23.12.20)

#### Site History

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

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

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

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

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

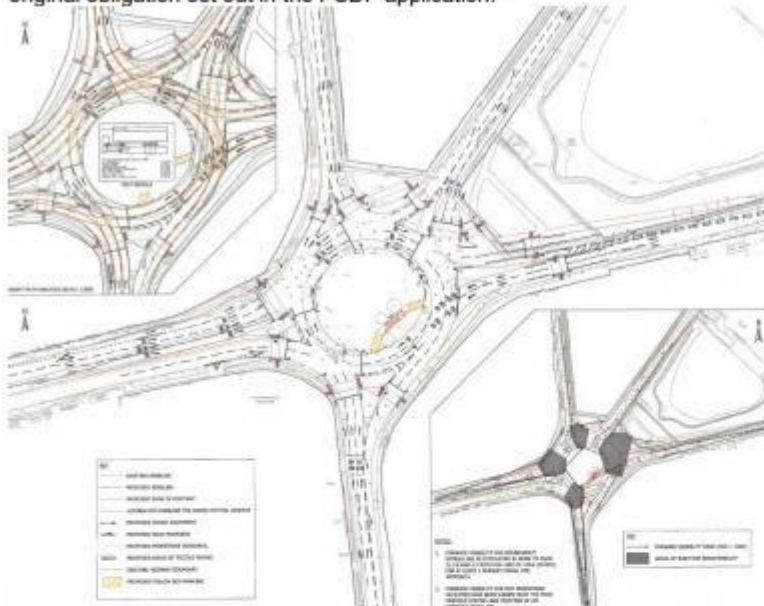


Figure 1. – The 2014 permitted FPR signalisation scheme.



Figure 2. – The 2019 Sevenhills Road improvement scheme.

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

### Current Application Context

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

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

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

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

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

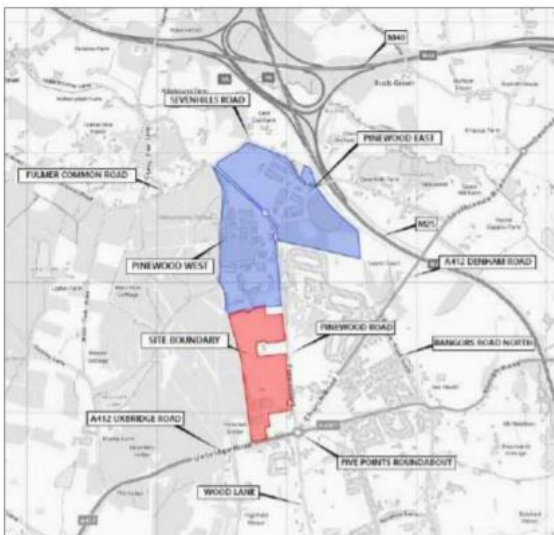


Figure 3 – Plan showing the site location (area in red)

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

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

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

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

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

#### Access Proposals

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

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

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

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



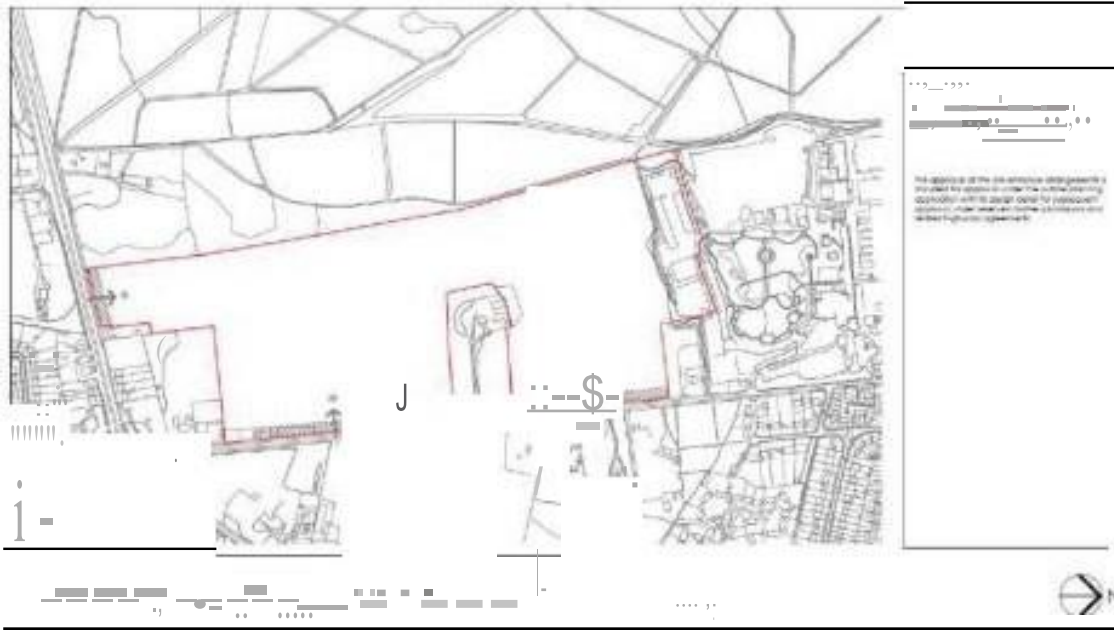


Figure4 - proposed access points.

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

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

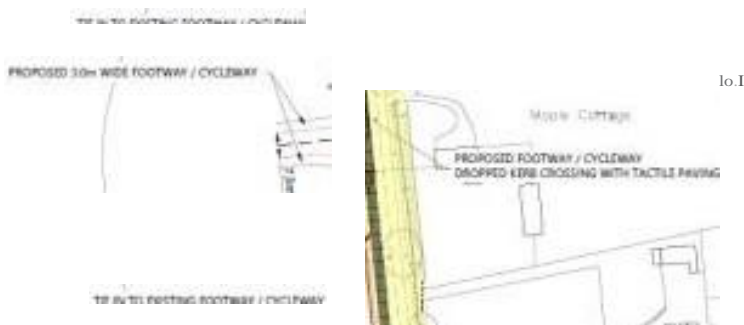


Figure5- Access arrangement as proposed for Pinewood Road.

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

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

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

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

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

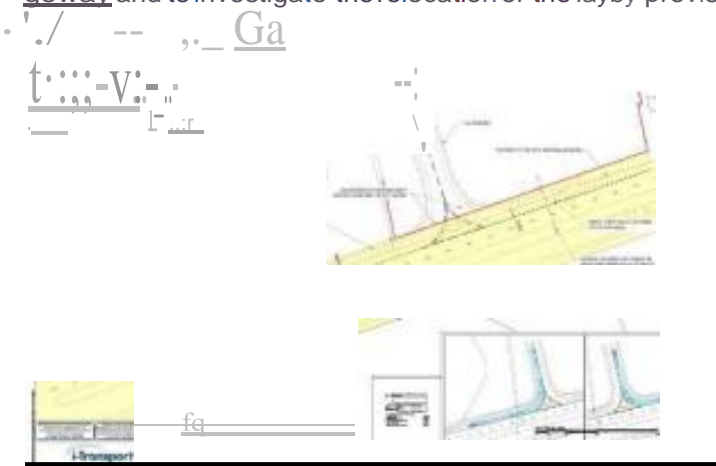


Figure 6-Access onto A412 Uxbridge Road, as initially proposed.

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

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

With respect to the concernraised in the RSA1 regarding the position of the existing layby, the Highway Authority is satisfied that a design should be submitted to re-provKSethe number of full spaces that are currently present by extensions to existing laybys. This shallbe secured by condition. In addition to this, surveys should be undertaken in the spring and ear1y summer of 2021 (subject to agreement with the HA) to determine if this provides adequate re-provision. The results of this survey shallbe presented to the Highway Authority and Planning Authority for assessment. Subject to this assessment a scheme shall be submitted and agreed to be implemented prior to the opening of the access. This shall be secured by condition.

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

#### Highway Network Assessment

Assessment of the existing networ1c conditions has relied upon guidance and agreement that took place for the Sevenhills Road application PU19/4430/FA. The Highway Authority had agreed with the applicants the study area and traffic survey data requirements for that application. Given the circumstances surrounding the COVI0-19 pandemic, the Highway Authority accepts that the studyarea submitted is sufficient. Outside of the study area the majority of traffic is dispersed along several key routes; the M40, M25 and the M4. An assessment of other junctions that would potentially be impacted as a result of theseproposals, is summarised below:

- Signal controlled junctions on the A412 at George Green on the Slough boundary have in recent years been subject to traffic signals refurbishment, and the Buckinghamshire Council ITS team have confmedthat there are no capacityconcerns at these junctions;
- The M40 Junction 1 at Denham forms part of the Highways England networ1c and any concerns relating to the operationof this junction would be expected to be addressed by Highways England; and
- Junctions along the A4007 Slough Road are shownin the distribution data to have low increases in vehicle numbers and so the impact would not be expected to be sufficient to require further work to thesejunctions.

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

#### Study Area

The study area that has been coveredby the TA covers the following junctK>ns:

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

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

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

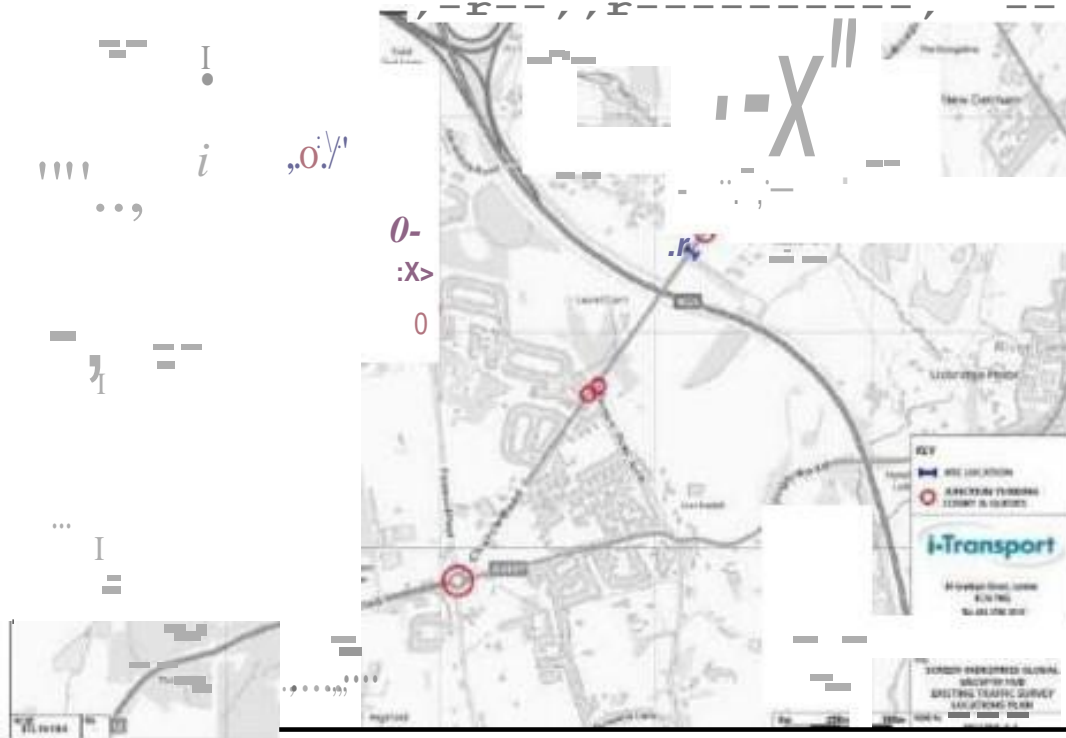


Figure 7 - Traffic survey area and survey locations.

**Baseline**

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

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

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

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

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

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

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

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

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

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

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

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



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

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

#### Trip Generation

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

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

The visitor attraction is expected to operate under three conditions;

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

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

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

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

Figure 9 overleaf shows the staff trip generation for the visitor attraction as set out in table 8.4 of the TA, whilst splitting it across different modes in accordance with the 2011 census data for journeys to work. This is considered robust given that Pinewood Studios have a successful shuttle bus service running and subject to maintenance and development of this, a modal split of at least this level is readily achievable. The table shows that in the busiest peak hour (0715-0815) for staff trips there will be 126 additional trips added to the net NO1.

TIME PERIOD	Trips by Mode					
	Driver	Passenger	Trade Oilier	School Oilier	Public Transport	Total
	20.0%	40.0%	15.0%	5.0%	20.0%	100.0%
	0	0	0	0	0	0
	0	0	0	0	0	0
AM Peak Hour 2 (0715-0815)	0	0	0	0	0	0
	0	0	0	0	0	0
PM Peak Hour 1 (1715-1815)	129	258	97	32	129	645
	129	258	97	32	129	645
PM Peak Hour 2 (1730-1830)	129	258	97	32	129	645
	129	258	97	32	129	645

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

	Staff Car Trips			Visitor Car Trips			TOTAL Car Trips		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
AM Peak Hour 1 (0715-0815)	87	0	87	0	0	0	87	0	87
AM Peak Hour 2 (0715-0815)	100	0	100	0	0	0	100	0	100
PM Peak Hour 1 (1715-1815)	0	19	19	0	129	129	0	148	148
PM Peak Hour 2 (1730-1830)	0	0	0	0	129	129	0	129	129

Figure 11 -Total visitor vehicle trip through the peak hours, taken from TN JGB/OF/ITL16184-0238 TN

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

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

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

Figure 9- Staff trips for the visitor attractK>n during low day peak hours.

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

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

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



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

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

TIME PERIOD		Trips by Mode from CensusData					Total
		Car Driver/ Motorcycle	Public Transport	Walking/ Cycling	Other		
		60.0%	13.3%	13.3%	3.3%	100.0%	
AM Peak Hour 1 (0700-0800)	An	6	1	1	0	10	
	Dep	0	0	0	0	1	
	Total	6	1	1	0	11	
AM Peak Hour 2 (0715-0815)	An	20	3	4	1	34	
	Dep	1	0	0	0	2	
	Total	21	3	5	1	36	
PM Peak Hour 1 (1715-1815)	An	11	2	3	0	19	
	Dep	16	3	4	1	27	
	Total	28	4	6	1	46	
PM Peak Hour 2 (1730-1830)	Arr	13	2	3	0	22	
	Dep	14	2	3	1	24	
	Total	28	4	6	1	46	

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

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

		Trips by Mode from Consus Datio					Total
TIME PERIOD		car Driver / Motorcycle	Passenger	Public Transport	Walking/ Cycling	oth-	
		79.2%	5.4%	8.0%	6.6%	0.8%	100.0%
AM Peak Hour 1 (0700-0800)	Arr	13					
	Total	2	0	0	0	0	2
		1		1		0	19
AM Peak Hour 2 (0715-0815)	Nr	27	2	3	2	0	34
	Dep	2	0	0	0	0	3
	Total	29	2	3	2	0	36
PM Peak Hour 1 (1715-1815)	Nr	4	0	0	0	0	5
	Dep	5	4	6	5		69
	Total	9	4	6	5		74
PM Peak Hour 2 (1730-1830)	Nr	2	0	0	0	0	3
	Dep	43	3	4	4	0	54
	Total	45	3	4	4	0	51

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

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

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

Figure 14 -Studio production spacetrip rates taken from TA table 8.14

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

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

Figure 15 – overall trip generation in the AM peak

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

Figure 16 – overall trip generation in the PM peak.

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

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

Sevenhills Road.

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

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

### **Traffic Impact**

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

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

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

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

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

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

well within practical capacity.

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

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

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

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

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

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

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

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

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



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

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

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

### Mitigation Discussion

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

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

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

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

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

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

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

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

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

#### Sustainability.

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

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

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

## Conclusions

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

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

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

## The Gardens Trust

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

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

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

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



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

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

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

### **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trusts BBOWT**

(26.11.21 most recent response, original comments received 15.12.20)

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

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

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

Baseline data unavailable

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

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

Mitigation within the lighting strategy is not appropriate

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

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

Inappropriate relocation of the Peace Path

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

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

## Severance of important bat commuting corridor

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

## Insufficient dark zone area

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

## Negative impacts on Black Park

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

## Light pollution

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

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

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

## Increased recreational disturbance

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

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

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

#### Errors and out of date BNG assessment

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

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

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

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

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

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

## **Buckinghamshire Strategic Access Officer**

(11.11.21 Most recent response below, original comments 10.11.20)

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

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

### 1. 'A New Peace Path'

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

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

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

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

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

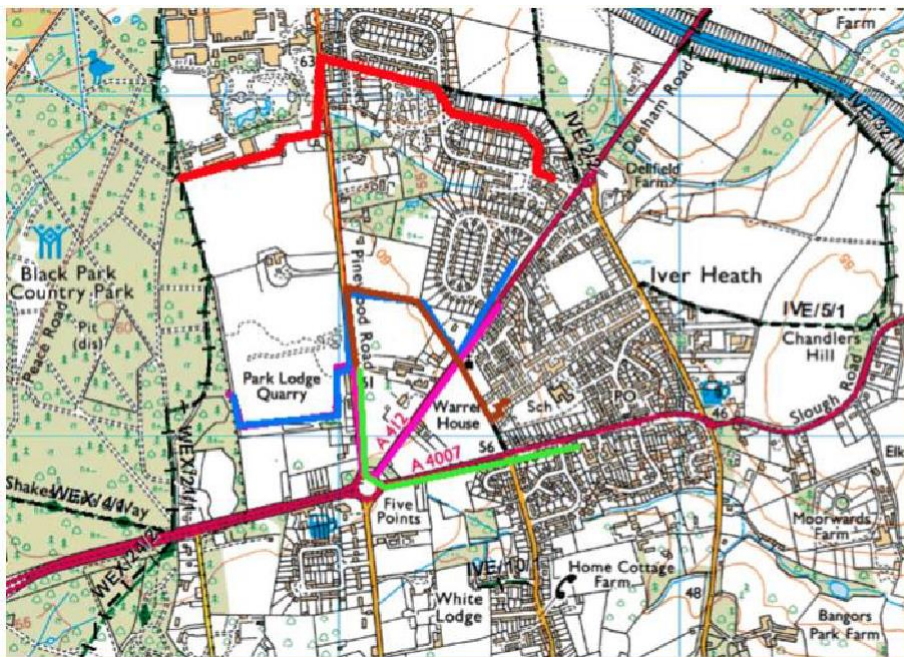
The study then goes on to illustrate the negative experiences along the existing Peace Path, to which I would add 'restricted opening times':

October to March 09.00 – 17.00 [not Christmas Day]  
April to September 08.00 – 21.00

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

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

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



Plan 1

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

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



Extract 1



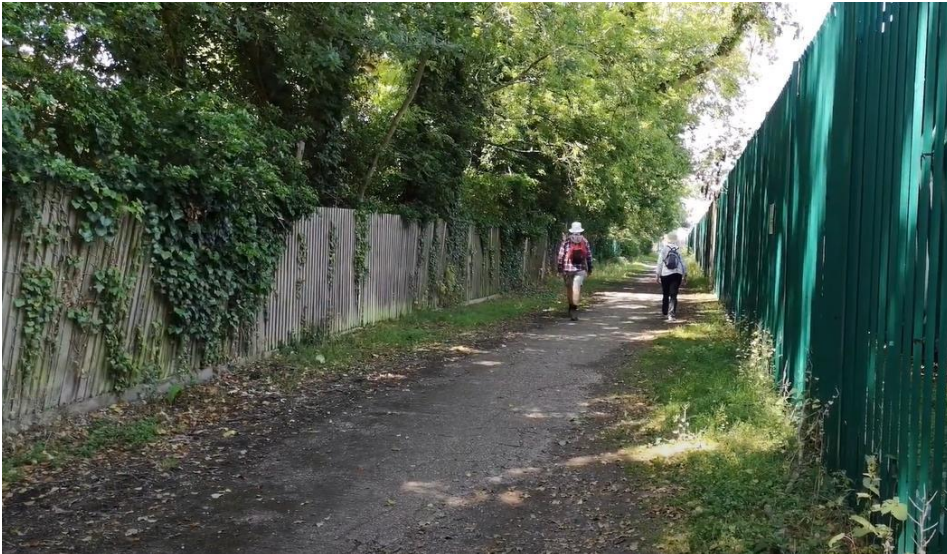


Photo 1

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

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

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

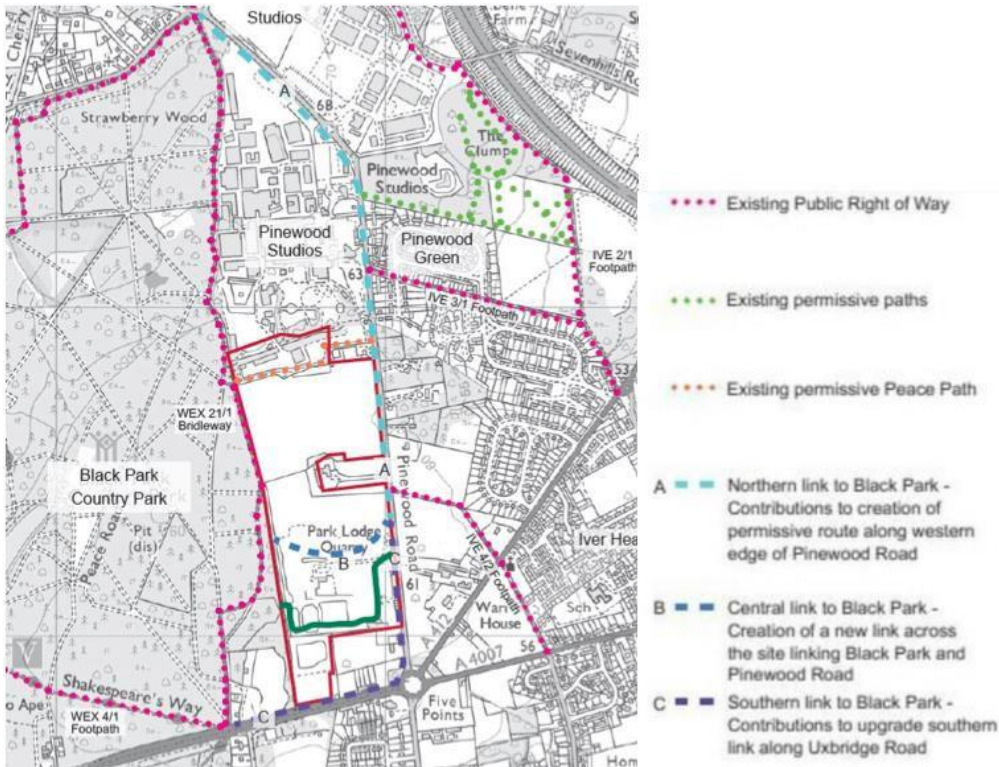
In addition, the southern half of Footpath IVE/4/2 linking Church Road and Pinewood Road is narrow, unlit, enclosed between fences and vegetation, and not overlooked, which reduces walkers confidence. I would therefore suggested a £40,000 s.106 contribution to be spent on improving the surface and width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

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

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

## 2. Car Parking & Peace Path Study

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



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

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

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

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

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



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

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

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

1. replaces the existing Peace Path connection to Black Park for residents in the vicinity of Pinewood Green inconvenienced by the shift south of the New Peace Path;

2. complements existing walking and cycling access [secured by Pinewood East s106 Schedule 6 and to be provided] emerging from just north of Pinewood Green [see my orange dashed lines below] from the direction of The Clump, emerging directly onto the existing Pinewood Road cycleway;



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

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

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

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

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



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

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



### Illustrative Peace Path replacement through Screen Hub site

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

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

(01.11.21)

Please refer to previous comments for reference.

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

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

(28.10.20)

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

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

Landscape Strategy (document 11)

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

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

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

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

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

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

Interestingly the following paragraphs in Appendix 1 of this document:

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

### General Observations

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

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

### **Economic Development**

(14.12.20)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Summary and Recommendations

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

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



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

**Buckinghamshire Environmental Health (Noise) Officer**

(20.1.2021)

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

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

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

(9.11.2020)

General

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

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

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

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

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

12.24 Night time operation at night should be assessed.

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

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

12.3 See 12.14

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

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

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

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

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

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

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

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

12.61 Would like to see this in the CEMP

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

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

12.98 Does this affect any other distant receptors?

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

If you have an questions please dont hesitate to contact me

### **Buckinghamshire Environmental Health (Contamination) Officer**

(05.11.2021)

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

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

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



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

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

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

The application requires the following condition(s)

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

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

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

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

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at [www.environment-agency.gov.uk](#)

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

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

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

### **Buckinghamshire Minerals and Waste**

(11.11.20)

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

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

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

‘Policy 25: Delivering High Quality Restoration and Aftercare

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

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

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

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

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

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

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

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

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

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

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

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

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

### **LLFA / Buckinghamshire Sustainable Drainage Officer**

(10.11.2020)

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

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

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

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

### Flood Risk

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

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

### Surface water drainage

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

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

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

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

#### Condition 1

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

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

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

#### Condition 2

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

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

### Condition 3

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

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

### Informative

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

### **Buckinghamshire Heritage Officer**

(06.11.20)

### Summary

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

### Heritage Assets

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

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

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

### Significance

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

### Little Coppice

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

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

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

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

### Heatherden Hall & Associated Structures

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

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

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

### St Margaret's Church

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

### Langley Park & Associated Listed Buildings

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

### Proposal

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

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

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

### Site Context

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

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

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

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

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



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

#### Indicative Masterplan and Layout – Design and landscaping

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

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

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

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

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

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

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

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

#### Heritage Impact

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

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

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

#### Little Coppice

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

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

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

#### Heatherden Hall

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

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

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

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

#### Heritage Policy Assessment

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

### NPPF

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

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

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

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

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

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

### Local Plan

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

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

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

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

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

### Conclusion

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

### **Buckinghamshire Archaeology Officer**

(15.11.21 response below, original comments 22.12.20)

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

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

#### Historic Environment Record (HER) information

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

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

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

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

#### Archaeological and related interests

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

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

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

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

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

## **Ecology**

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

### **Summary**

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

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

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

### **Documents Referenced**

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

### **Comments**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The necessary openspace and habitat could in theory be incorporated on to green roofs. A previous Pinewood Studios application included green roofs and this has been shown to be a great success and has provided good compensation for Skylarks. The documents below give more details about it:  
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The application is at outline stage and so there is still potential for green roofs to be incorporated into the design. However, it may also be possible for a suitable financial contribution to enable compensation to be provided off site, this has previously been secured as compensation on other sites within Buckinghamshire.

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

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

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

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

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

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

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

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

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

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

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

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



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

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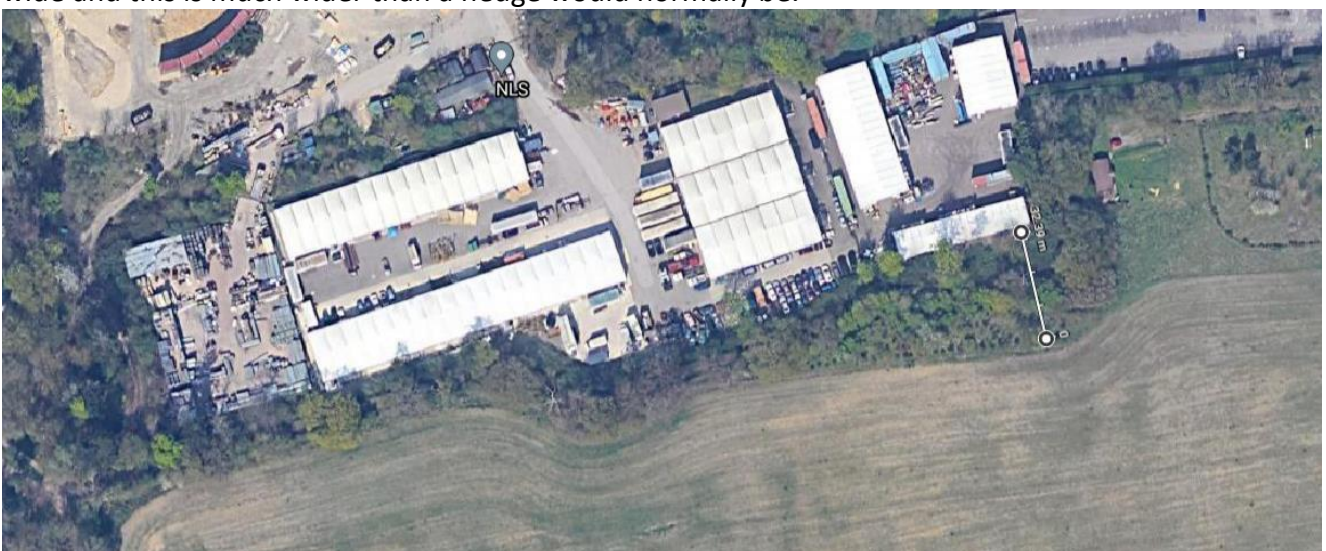


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this were to be the case then there is plenty of opportunity to increase the biodiversity value of the site, e.g. incorporation of green roofs.

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

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

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

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

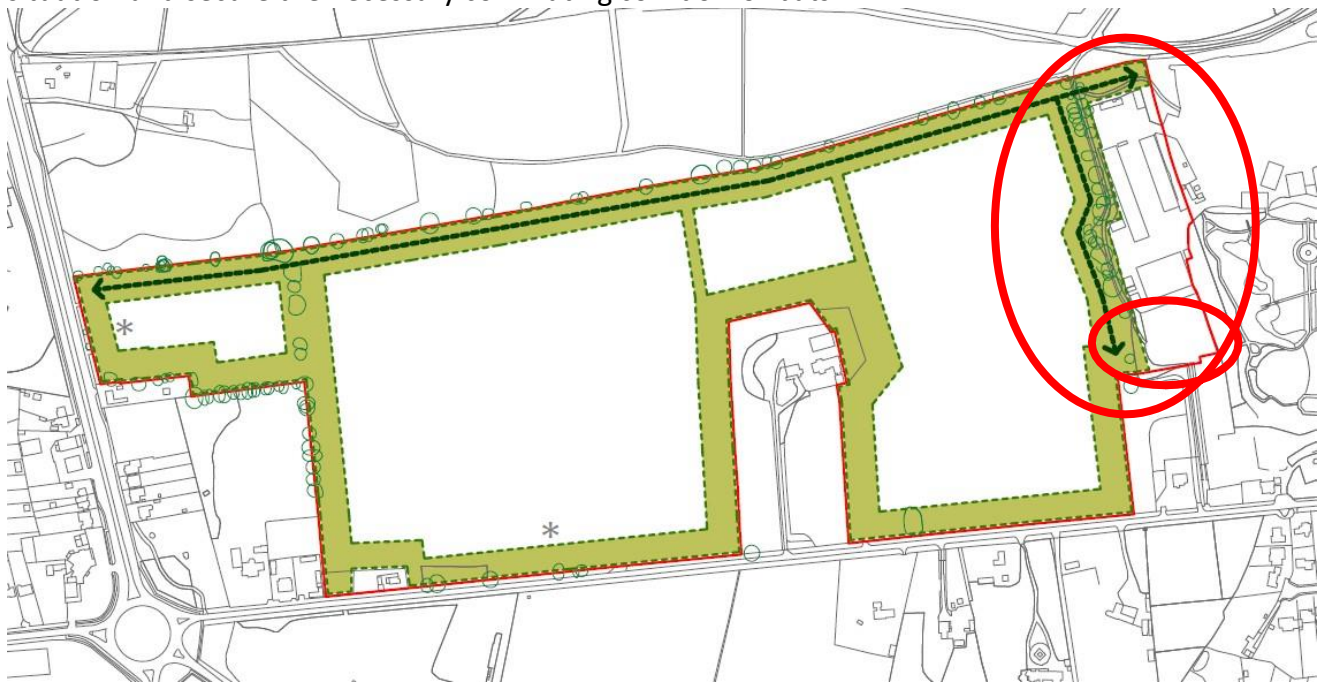


Figure 2. Image of PP4 – Green infrastructure plan (drawing reference: 3770-FB-SK-05-140920 Rev P3).

## Recommendations

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

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

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

Issues which will need to be addressed through conditions:

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

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

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

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

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

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

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

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



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

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

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

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

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

A detailed reptile mitigation strategy.

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

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

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

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

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

## **Conditions**

### **Updated baseline**

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

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

### **Minimum requirements**

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

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

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

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

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

### **Updated surveys**

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

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

### **Ecological design strategies**

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

The EDS shall include the following:

Purpose and conservation objectives for the proposed works.

Review of site potential and constraints.

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

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

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

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

Persons responsible for implementing the works.

Details of initial aftercare prior.

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

Details for disposal of any wastes arising from works.

Provision for wildlife corridors, linear features and habitat connectivity.

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

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

Soil handling, movement and management.

Creation, restoration and enhancement of semi-natural habitats.

Species rescue and translocation, reptiles.

Bat crossings for new roads.

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

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

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

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

### **Construction Environmental Management Plans (Biodiversity)**

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

Risk assessment of potentially damaging construction activities.

Identification of “biodiversity protection zones”.

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

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

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

Responsible persons and lines of communication.

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

Use of protective fences, exclusion barriers and warning signs.

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

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

### **Landscape and ecological management plans (LEMPs)**

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

Description and evaluation of features to be managed.

Ecological trends and constraints on site that might influence management.

Aims and objectives of management.

Appropriate management options for achieving aims and objectives.

Prescriptions for management actions.

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

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

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

Ongoing monitoring and remedial measures.

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

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

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

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

#### Lighting design strategy for light-sensitive biodiversity

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

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

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

Reason:

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

#### Lighting reduction on the wider site

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

Reason: to ensure that any harmful lighting to bats on the wider pinewood studios site is appropriately reduced to prevent negative impacts upon Bechstein’s bats.

#### **Bechstein’s monitoring**

Prior to commencement an annual monitoring plan, which has been produced by an expert in Bechstein’s bats, shall be submitted to and approved in writing by the Local Planning Authority. The Monitoring plan must set out clear objectives, methods, reporting or results and funding requirements (to be fulfilled by Pinewood Studios), which must include the monitoring of Bechstein’s bats in Black Park and how they use the areas adjacent to Pinewood studios.

Reason: to ensure that negative impacts upon Bechstein’s bats are avoided through the avoidance, mitigation and enhancement measures relating to the scheme.

## Country Parks, Communities Directorate

10.11.20

### Public Access

The existing Pinewood Link Path is an important link between Iver Heath and Black Park. The route has a nice feel to it with views out across the former quarry site and there are some notable trees that again add to the aesthetic quality of the route. It is well used and well established and it has been noticeable throughout the Covid-19 pandemic that usage levels have been significantly higher. It connects into the parks primary path network and this access point has been identified in the country parks spatial plan as a key access point and a location where the parks would want to further improve information and orientation for visitors.

The loss of this path will in our opinion have a significant impact on residents of Pinewood Green and more widely Iver Heath. They will lose a very direct route into Black Park that links in well with the existing network of footpaths and roadside pavements. The ability to easily walk to the park significantly increases the likelihood that people will walk and contributes, to the health and wellbeing of the local community and also reduces car use.

The indicative new route presents several issues, firstly due to its locations, connectivity with Pinewood Green and Iver Heath is not as good as the existing route although improvements to an adjacent Public footpath could help mitigate this. This is also a cross country route through a very narrow alleyway with no lighting or nearby residential occupation which may appear unsafe to some sectors of the community compared to the existing route through Pinewood Green. On reaching the county park the proposed new path will not link in to the parks primary path network in the same way that the existing link path does. (fig 1) The paths on the eastern side of Black Park are secondary routes and this is reflected in the type and quality of the surfacing of the paths. (fig 2)

To bring a new access route in at another point in Black Park will require the developer to carry out works to improve the internal path network in the park, both in terms of surface quality and also connectivity with the main path network. The developer will also need to provide information and orientation for visitors accessing the park from the proposed new route as it is a very different arrival point for the existing route.

Any proposal for a new route should be an improvement on what is already offered and the quality of the route and experience of walking it should be a key part of its design. Users must not feel hemmed in and the route needs to feel safe and open. Access improvements for cyclists and pushchairs and mobility buggies should be factored in especially when looking at the width of the path surface.

The proposed relocation of the Pinewood Link Path will increase visitor numbers in areas of the park that are quieter and also potentially change the ways in which trees need to be managed for public safety. Ecological survey work in the area where the path will be relocated to should be conducted as should tree condition surveys and a plan for any remedial works, where use levels will be increased in areas of Black Park by this development.

### Boundary, Fencing and Screening

The views out over the restored open ground from Black Park's eastern boundary adds significantly to the feel and quality of this part of the park. In the spring the path is lined with Bluebells and is enjoyed and appreciated by many visitors every year. The proposed development will significantly impact on this and even with a 30 metre buffer strip, the sense of space will be lost and the visual quality degraded. We are particularly concerned about the area nearest to Taylors Gate where the

perimeter path inside Black Park is directly adjacent to the fence. We would want a 30 metre plus 20 metre approach applied, where a buffer of 50 metres is achieved from the perimeter paths edge, up to 20 metres of this can be found within Black Park with a minimum of 30 metres on the proposed development side, but where there is less than 20 metres buffer available in Black Park this will need to be made up on the proposed development site to a maximum of 50 metres.

This will at least preserve some sense of openness and prevent the claustrophobic and unappealing feel of the perimeter path adjacent to the Pinewood Studios (fig 3) existing facilities.

Any security type fencing (fig 4) must not be adjacent to the parks boundary and should be at least 50 metres away from the adjacent path. Agricultural type fencing that is currently in use should be used to define the boundary between the park and development site. (Fig 5)

The use of soil bunds in landscaping also needs to be carefully considered as the current approach by Pinewood is both highly damaging to trees and incredibly ugly! (fig 6) Any soils that are imported on to the development site must be of a neutral or acidic pH value complementing the existing soils of the Country Park to encourage appropriate plant colonies. We appreciate there will be a need to fence and screening off the proposed development but its relationship with Black Park must be as much of a consideration as its function for the developer. Any bunds should be a minimum of 50 metres away from the Black Park boundary path.

#### Location of the proposed Backlot Area

We are very concerned about the proximity of the proposed backlot area to the Black Park boundary. The park already has two backlot areas immediately adjacent to it from the existing studio complex; these are often very messy and aesthetically (fig 7) look unpleasant when viewed from the park. They are also prone to produce litter that blows into the park through the fence and have been the source of several pollution incidents that have found their way into park watercourses, backlots can also create additional noise and light pollution.

Any proposed development should locate backlots away from the Black Park boundary for these reasons and to try to ensure that the view from the park towards the propose development is as aesthetically pleasing as possible.

#### Trees, Environment and Ecology

Black Park's eastern boundary is well established with some significant landscape and hedgerow trees. It is also an area where Bluebells can be found and rapidly spreading.

Recent thinning of adjacent woodland compartments has led to increases in diversity in the understorey and there are anecdotal records of more diverse wildlife in this area. It is worth noting that prior to this development proposal the adjacent quarry area was to be restored to agricultural land, this would have meant that disturbance to this area from adjacent activity would have been minimal. The development proposal will generate at least another three years of disturbance through the construction phase and then a permanent higher level of disturbance than would have been experienced if it had been retained as agricultural land. This must be considered and mitigated for in the development proposal.

Trees adjacent to the development site must have significant protection measure put in place, both through the development and against future operation of the site. Currently operating practices in Pinewood Studios is a concern with very little consideration given to root protection or other practices such as storing equipment under veteran trees. (fig 8)The development should not compromise management practices that benefit wildlife such as retaining deadwood in the crowns of trees.

Approx. 100 metres from the North West corner of the proposed development site a colony of Bechstein Bats has been found, further details of this will be provided, but this must be fully

considered and protected as part of this development. This is a recent and exciting discovery and aspiration for this development should be to protect and further understand its extent and opportunities the development may present to protect and enhance habitat for this rare species. Details of this colony have been provided in a separate submission by Daniel Whitby and directly to the developers ecology team..

Too the South Eastern corner of the proposed development is a thin strip of woodland within Black Park between Billet Field and the development site. This is one of the most undisturbed areas of the park and a real refuge area for wildlife. Badger activity has recently been picked up on camera traps Billet Woods Badger and a Bechstein Bat has been trapped close to this area. Further ecological investigation of this area is needed as it has high wildlife potential and this development will negatively impact on this.

If the proposed development goes ahead through increased disturbance of the area it will be of lesser value to wildlife, we would be looking for onsite mitigation to enhance other wildlife refuge areas within Black Park.

It should also be taken into consideration the proximity of the Black Park Lowland Heath SSSI, which has been identified by Natural England as the best example in the County. This development will have direct and indirect impacts on this sensitive site and its wildlife and we would expect a package of mitigation to be put in place to help offset these.

#### Commercial Relationship with Black Park

Pinewood Studios and Black Park have always had a close and good working relationship, Black Park benefits commercially from the proximity of Pinewood Studios and likewise Pinewood Studios offer to film productions is enhanced by Black Park. Opportunities exist with this development to build on this and also bring wider benefits to the UK film industry and park users.

The access route into Black Park from the studios through Taylors Gate should be improved so that film productions can move vehicles and equipment easily between the park and the studios. This will reduce the number of vehicle movements associated with filming on local roads and also reduce distances that vehicles have to travel internally in Black Park. We would also like the development to provide an access route into Black Park from the proposed junction with the A412, this would provide a much safer access route in to the park for commercial and filming access and also remove the need for a difficult turn in and turn out onto the A412 from our existing commercial entrances.

With the proposed development increasing vehicle use on the A412 this will also help with road safety issues and also allow Black Park to move vehicle activity away from busier visitor areas within the park.

#### Wider Impacts on Black Park as a visitor destination

Black Park is a regional visitor destination attracting in excess of 750,000 visitors a year; it facilitates the employment of approx. 125 people, predominantly from the local area and contributes over £1 million to the local economy annually. Langley Park which is adjacent to Black Park also attracts over 250.000 visitors a year and is a significant attraction in its own right too. It is very important that this is recognised and it is understood that the local road network is already serving to very well used and busy visitor destination. Visitor numbers to the Country Parks are also growing and look set to grow for a number of years.

The proposed development will add considerable pressure to the local road network and importantly peak times for visitors to the film themed experience will be the same peak times as visitors to Black



Park and Langley Park. The A412 is of particular concern as it is a fast and dangerous road, with accidents occurring regularly at the Black Park road junction.

There is also considerable use of the laybys adjacent to Black Park and Langley Park as parking areas by people not wanting to use the main car parks. The concern here is there are regularly cars slowing suddenly trying to find spaces, cars stopping and reverse parking against the traffic, parking on acceleration lanes and slip roads, parking on verges and pedestrian footways.

Increased volumes of traffic on this road due to the construction of and operation of the proposed development will increase the risk to all road users on the A412 and also create additional noise, disturbance and air quality issues for both Black Park and Langley Park. We would want road safety improvements on the A412 to be part of this development and a key consideration of the planning process. Issues with lay-bys and slip-road need addressing and with another junction being created on the A412 we would want the speed limit reduced to 40mph.

#### Impact on the visitor experience in Black Park

Black Park is not just a destination for recreation, it is very important to visitors from a health and wellbeing perspective too. Use of the park can improve visitor's mental wellbeing, physical health and contribute to other Govt. objectives such as tackling childhood obesity. The proposed development has the potential to devalue some of these benefits in several ways.

- Increased noise and light pollution through construction, the operation of the attraction and also filming activity adjacent to the park boundary.
- Degrading the visual quality of the eastern boundary of the park, research strongly indicates that the quality of a natural environment is linked to its value from a mental wellbeing perspective. The quality of the eastern area of Black Park will be degraded in this context and be of less value to visitors.
- The eastern boundary may become a less desirable area for visitors to walk and lead to additional pressures on other areas of the park; these in turn become more crowded and lose some of the benefit that they create.
- Many visitors strongly value opportunities to engage with nature, these opportunities may be impacted on in areas adjacent to the proposed development or visitors will be less likely to visit and use this area of the park due to its proximity to the proposed development.

#### Appendix 1 Images.

Fig 1. Existing path infrastructure in Black Park as you enter from the Pinewood Link Path. Fig 2. Path type and condition adjacent to the proposed replacement link path route.

#### Appendix 1 Images.

Fig 3. Fence and bund and set construction adjacent to the eastern boundary path.

Fig 4. Detail of visually unappealing security fence adjacent to the Black Park boundary. Appendix 1 Images.

Fig 5 Low visual impact agricultural style fencing is in keeping with Black Park.

Fig 6. Messy/unattractive bund with soil piled around the base of a declining mature tree. Appendix 1 Images.

Fig 7 Dumping and litter adjacent to the Black Park boundary in the Backlot area. Appendix 1 Images.

Fig 7. Trailers parked under a veteran tree.

Report



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PLANNING & SUSTAINABILITY.

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**Report for** – Buckinghamshire Council  
Screen Industries Global Growth Hub Partial ES, Compliance and Standalone  
Document Review  
Final Review Report 002

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**Document version control**

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Version	Date	Author	Reviewed by	Reviewed and approved by
1.0	25/02/2021	Various	Jessica Parnwell	James Sanders
1.1	26/02/2021	Various	Jessica Parnwell	Jessica Parnwell

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**Report for:** **Buckinghamshire Council**

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**Main contributors:** **Various**

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## **Contents**

1.0	Introduction to the Review	1
2.0	Review of Submitted Clarification and Potential Regulation 25 Requests	2
3.0	Summary of Mitigation Measures	8

## **Appendices**

Appendix A	– Interim Review Report	12
Appendix B	- Final Review Report 001	13

## 1.0 Introduction to the Review

- 1.1.1 The Temple Team carried out an independent review of Chapters 7, 10 and 11 of the Environmental Statement (ES) submitted in support of the planning application for Screen Industries Global Growth Hub (Application Reference: PL/20/3280/OA). The output of the review was an Interim Review Report (IRR) (**Appendix A**) submitted to Pinewood Group Limited (PGL), 'the Applicant' by Buckinghamshire Council.
- 1.1.2 In response to the IRR Turley, on behalf of the Applicant, submitted the 'Response to Temple Comment' document dated 11<sup>th</sup> December 2020. This was reviewed in January 2021; the Final Review Report 001 (**Appendix B**) contained the review of this response.
- 1.1.3 The Applicant submitted a further response to those clarification and potential Regulation 25 requests considered outstanding in the FRR001, in the 'Screen Industries FRR Response' document dated February 2021. A review of the specific responses to the individual IRR clarification and potential Regulation 25 requests is presented within **Chapter 2** of this FRR 002.

## **2.0 Review of Submitted Clarification and Potential Regulation 25 Requests**

- 2.1.1 The Applicant has responded to the remaining clarifications and potential Regulation 25 requests in the 'Screen Industries FRR Response' document dated February 2021.
- 2.1.2 **Table 2.1** below provides a review of the remaining requests for clarifications and potential 'further information' (under Regulation 25) in the January 2021 FRR.
- 2.1.3 Each clarification and potential 'further information' (under Regulation 25) request has been dealt with individually in **Table 2.1** and the Temple Team have stated whether the Applicant's response is deemed to be acceptable to close out the issue, or whether further clarification or information is required. If there are outstanding issues following the reassessment, a further round of review may be required.

**Table 2.1 Assessment of Response to FRR within the ‘Screen Industries FRR Response’ document, February 2021**

Chapter IRR Ref No.	Request Type	Comment / Request IRR	Comment / Request FRR	Review Commentary	Review Conclusion Responses considered to be <b>Acceptable (Green)</b> or <b>Unacceptable (Red)</b>
Chapter 7: Landscape and Visual Ref: 4	Clarification	Amendments to photomontages to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	The green infrastructure parameter plan (Figure 4.6) identifies the location of a peripheral belt of multi-functional green infrastructure (GI), including new/enhanced landscape and ecology and a strengthened landscape frontage to Pinewood Road. It does not specify the quantum or extent of tree/shrub planting within this GI corridor and does not commit to provision of the woodland belts that have been modelled. The assessment should not rely on the establishment of woodland belts, which may or may not be found to be feasible at reserved matters stage. It is accepted that the photomontages cannot accurately identify the potential access locations but a note in the photomontage footer to flag up the requirement for these access points would have helped avoid any misunderstanding by the general public that the hedgerow would be left intact.	The Applicant has offered a commitment to provide a 10-15 m depth of planting. This should be identified on the PP4: Green Infrastructure parameter plan to reflect the findings of the LVIA.	<b>Acceptable</b> This is considered acceptable on the basis that the Applicant's commitment is secured through an appropriately worded planning condition. This has been included to Table 3.1. below.
Chapter 7: Landscape and Visual	Clarification	Revisions to the landscape and visual impact assessment to (1) accurately reflect the	As noted in the Ref: 4 response above, the green infrastructure parameter (Figure 4.6) does not commit to the provision of	As noted in the Ref: 4 response above, provision of a 10-15 m depth of planting within the 30 m buffer to Black Park should be	<b>Acceptable</b> This is considered acceptable on the

Ref: 5		relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	woodland belts and hence there is no basis to assume a continuous 10-13m high woodland buffer in the Year 15 assessment. As per the response to IRR Ref 4, it would be useful if the Applicant could identify during the which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned. It is accepted that the Chapter 7 LVIA judgements include the assumption that accesses will be required. The reviewer is satisfied that the large magnitude of change identified for views from Pinewood Road at Year0 would 'accommodate' the 20m length of hedgerow loss associated with each of the proposed junctions off Pinewood Road.	identified on the PP4: Green Infrastructure parameter plan. The LVIA and photomontages are also based on provision of woodland belts along Pinewood Road.	<b>basis that the Applicant 's commitment is secured through an appropriately worded planning condition. This is included in Table 3.1 below.</b>
Chapter 7: Landscape and Visual  Ref: 8	Potential Regulation 25	Provide justification as to the level of the effect in Year 15 with specific reference to the effectiveness of the woodland buffer in winter.	The Applicant has stated that the LVIA judgements take into account the fact that views of buildings will not be completely screened from the section of bridleway closest to the Site. The illustrative masterplan (DAS Figure 6.10) indicates a line of intermittent trees/parade along the centre of this GI corridor/parallel to the western siteboundary. This small number of trees will provide some intermittentfiltering of views during the winter months at Year 15.	The Applicant has offered a commitment to provide a 10-15 m depth of woodland planting. This should be identified on the PP4: Green Infrastructure parameter plan to reflect the findings of the LVIA.	<b>Acceptable</b>  This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action required.
Chapter 7: Landscape and Visual  Ref: 9	Potential Regulation 25	The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of	The Applicant has stated that the reduction in effects is largely a consequence of the maturing vegetation; however, as previously	As noted in the Ref: 4 response above, provision of a 10-15 m depth of planting within the 30 m buffer to Black Park should be identified on the PP4: Green	<b>Acceptable</b>  <b>This is considered acceptable on the basis that the</b>



		significant effect falls from Year 0 to Year 15 should also be provided.	stated, it is not clear whether woodland planting is proposed.	Infrastructure parameter plan. The LVIA and photomontages are also based on provision of woodland belts along Pinewood Road.	<b>Applicant's commitment is secured through an appropriately worded planning condition. This has been included to Table 3.1. below.</b>
Chapter 10: Climate Change  Ref: 16	Potential Regulation 25	Provide an estimate of GHG emissions associated with the transportation of c. 2 million visitors and associated servicing of the scheme, and update overall residual effects accordingly.	<p>Excluding operational activities such mains water consumption, wastewater treatment, and the transport and treatment of waste is considered acceptable, as stated in the initial review.</p> <p>With regards to the emissions associated with transport, the Applicant states that this <i>"cannot be carried out accurately as there is no way of determining which of the potential c.2 million trips are new, i.e., they are additional to those already on the network"</i>, and points to Paragraph 10.90 of the chapter relating to increased use of electric vehicles and other low carbon initiatives for freight transport.</p> <p>Whilst the IEMA GHG assessment guidance acknowledges that qualitative assessments are acceptable where data is unavailable, it is considered that reasonable assumptions could be readily applied to give a reasonable worst-case assessment. The nature of the Proposed Scheme is such, that it is likely that trips are made specifically to visit it and a sensible trip origin and vehicle type</p>	<p>The Applicant has provided a detailed and reasoned response to this further request for information.</p> <p>Their response now includes a clear description of transport related mitigation embedded into the scheme and an explanation of the future baseline trends in decarbonising vehicular traffic, which weren't included in detail in the original ES chapter the review was based on.</p> <p>The Applicant's argument regarding how the IEMA guidance allows for qualitative assessment is accepted and clearly recognised. It is also understood that the Applicant has chosen to select a notional quantitative threshold against carbon budgets as a basis for assessing significance, and therein lies an inconsistency and reason for the Reviewer seeking some degree of quantification. If the significance thresholds are largely based upon a quantified proportion of a carbon budget and many of the construction and operational emissions have been</p>	<p><b>Acceptable</b></p> <p>This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action required.</p>

			<p>could be applied in the absence of anything more detailed from the Transport Assessment (which would be surprising if this is not available).</p> <p>Not being able to accurately estimate emissions is not the same as not including a very broad assessment with clearly stated assumptions. Therefore, it is considered that, notwithstanding the above points, a critical source of GHG emissions has been excluded from the magnitude set out in Tables 10.13-10.15 and the assessment is not acceptable.</p>	<p>quantified, then it follows that to then simply exclude a potentially large (if inherently uncertain) source of emissions from the assessment (e.g. in Table 10.16) without factoring in the qualitative aspect leads to questions over the approach.</p> <p>In essence, transport emissions may not be significant on their own, but combined with the other operational emissions they might be.</p> <p>That said, it is agreed that <i>“The mitigation measures [now clarified] would not change if an attempt were made to undertake a quantitative assessment.”</i></p> <p>Therefore, there is no further benefit to be gained by providing further quantification and this point is now agreed.</p>	
<p>Chapter 10: Climate Change</p> <p>Ref: 20</p>	<p>Potential Regulation 25</p>	<p>Update the NTS to reflect the comments and include all significant effects and a description of climate change adaptation/resilience.</p>	<p>The Applicant states that the NTS already concludes that effects would not be significant, taken from the assessment conclusion. In light of their responses, it is not considered the NTS required updating.</p> <p>The Reviewer is still concerned about the exclusion of a reasonable worst-case assessment of operational traffic, as set out in the review of Ref: 16. Inclusion of emissions from c. 2 million net additional annual trips from wherever they might arise is expected to lead to an increase in the overall emissions well above</p>	<p>Given the response provided by the Applicant and noting the Reviewer’s response to Ref: 16, this is agreed.</p>	<p><b>Acceptable</b></p> <p>This is considered acceptable and does not constitute ‘further information’ under Regulation 25 of the EIA Regulations. No further action required.</p>

			the 3% magnitude threshold identified in the assessment, and therefore trigger a significant effect which should be identified in the NTS.		
Chapter 11: Air Quality  Ref: 28	Clarification	Figure A11.1 needs to be updated to show distance bands to Pleasant Cottage Guest House, Pinewood Manor & Goosebarry Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings.	<p>The Applicant has advised that distance bands were generated from the boundary of the Site which provides a worst-case assessment and therefore no updates are required.</p> <p>Drawing distance bands from the site boundary for construction dust assessments is acceptable however the distance bands in Figure A11.1 have not been drawn correctly around the southern end of the site and need to be updated.</p>	<p>The Applicant has used the distance bands (represented in the revised buffer maps) to correctly identify the potential for fugitive dust from earthworks, construction and trackout activities to impact amenity/human health within Appendix 11.4 of the ES Chapter uploaded to the planning portal on 1st Oct 2020. The mitigation measures have been selected in accordance with the IAQM guidance for a high-risk site and the previous planning recommendations that have been made are appropriate, assuming the Applicant commits to putting the measures in Appendix 11.4 into the CEMP or Dust Management Plan.</p>	<p><b>Acceptable</b></p> <p>No further clarification required.</p>

### 3.0 Summary of Mitigation Measures

- 3.1.1 The table below provides a summary of all mitigation measures proposed by the Applicant across the topics that the Temple Team have been commissioned to review, both embedded and additional.
- 3.1.2 The mitigation measures proposed have not been updated as a result of the Applicant's response document, though we propose additional recommended measures as a result of this review, these are highlighted in **bold**.
- 3.1.3 Buckinghamshire Council should ensure they secure the delivery of these mitigation measures by means of an appropriate approval, obligation, agreement and/or condition.

**Table 3.1: Summary of Mitigation Measures**

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
LVIA	Pre-Construction	None	None
	Construction	<p>Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS5837:2005 Trees in relation to construction).</p> <p>Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS5837:2005 Trees in relation to construction).</p> <p>Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009);</p> <p>Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.</p>	None

	Operation	<p>Keeping building heights lower in proximity to visual receptors (residential receptors);</p> <p>Retaining all high and medium value trees with appropriate root protection buffers where possible, as identified by the Arboricultural Impact Assessment (see Appendix 7.2);</p> <p>Where vegetation losses are unavoidable (e.g. at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;</p> <p>Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;</p> <p>Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points;</p> <p>Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;</p> <p>Within the green infrastructure buffer, and adjacent to Black Park where the PRow is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;</p> <p>Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/year);</p> <p>Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties.</p>	<p>Consideration of the opportunity at Reserved Matters stage for creation/enhancement of an east-west pedestrian/cyclelink (as highlighted in the Colne and Crane Green Infrastructure Strategy) east-west across the site, ideally linking with existing public footpaths along the eastern edge of Pinewood Road.</p> <p>Preparation of detailed landscape proposals at Reserved Matters stage to provide a robust framework of vegetation for landscape and visual integration purposes.</p> <p>Careful consideration at Reserved Matters stage of the colours and textures of building materials.</p> <p>Careful consideration at Reserved Matters stage of the treatments of signage, security fencing, lighting columns and other free-standing features along the site periphery.</p>
Climate Change	Pre-Construction	None	None
	Construction	Site Waste Management Plan and Construction Environmental Management Plan	None
	Operation	“Fabric first” approach with building envelope performance beyond the	None

		minimum backstop requirements of the Building Regulations Part L 2013; 100% low energy (LED) lighting; High efficiency gas boilers or low carbon heat pumps where heating is required; 10% of the site's energy delivered through low carbon renewable energy.	
<b>Air Quality</b>	Pre-Construction	None	None
	Construction	None	Dust mitigation to be included in a Construction Environmental Management Plan (CEMP).
	Operation	None	None
<b>Additional Recommended Measures</b>			
<p><b><u>Compliance Review</u></b></p> <p>The Applicant should provide worst-case scenario parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.</p> <p>Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.</p> <p><b><u>Landscape and Visual Impact Assessment</u></b></p> <p>A Landscape and Ecological Management Plan should be prepared at the Reserved Matters stage.</p> <p><b>A commitment to provide a 10-15 m depth of planting should be secured through an appropriately worded planning condition and then this should be identified on the PP4: Green Infrastructure parameter plan.</b></p> <p><b><u>Climate Change</u></b></p> <p>Provide details of how mitigation measures can be further developed at later design stages, and monitored during construction and operation.</p> <p><b><u>Air Quality</u></b></p> <p>It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.</p> <p>It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.</p> <p><b><u>Sustainability Statement</u></b></p> <p>A planning condition should be raised to ensure the development provides 10% of its energy requirements from renewable or low carbon sources.</p> <p>A Materials and Waste Management Strategy is required to support the reserved matters application. It is recommended that the material use proposals within the whole life carbon assessment is considered as soon as possible to make the most meaningful impact.</p> <p>A construction stage water management strategy is required to support the reserved matters application. A</p> <p>Site Waste Management Plan is required to support the reserved matters application.</p> <p>A Drainage Strategy is required to support the reserved matters application.</p>			

An Energy Strategy is required to support the reserved matters application.

An Overheating Report is recommended to support the reserved matters application.

## **Appendix A – Interim Review Report**



**Report for** – Buckinghamshire Council  
Screen Industries Global Growth Hub Partial ES, Compliance and Standalone Document  
Review  
Interim Review Report Final



## Document Version Control

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Version	Date	Author	Reviewed by	Reviewed and Approved by
1.0	17/11/2020	Various	Jessica Parnwell	Spencer McGawley

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**Report for:** **Buckinghamshire Council**

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**Main Contributors:** **Various**

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## 1.0 INTRODUCTION TO THE REVIEW

### 1.1 Introduction

- 1.1.1 The Temple Team have been commissioned by Buckinghamshire Council to carry out an independent review of Chapters 7, 10 and 11 of the Environmental Statement (ES) submitted in support of the planning application for Screen Industries Global Growth Hub (Application Reference: PL/20/3280/OA). The review of these technical chapters is found in **Section 2** of this report.
- 1.1.2 In addition to the aforementioned technical chapter reviews, the Temple Team have also been commissioned to review regulatory compliance of the ES, and the Sustainability Statement and Landscape Strategy submitted in support of the planning application. The ES compliance review is found in **Section 3** and the review of the standalone documents is found in **Section 4** of this report.
- 1.1.3 Mitigation measures that the Applicant proposes and recommendations by the reviewer are included in **Section 5**.
- 1.1.4 This Initial Review Report (IRR) provides a review of the aforementioned documents prepared by Turley on behalf of Pinewood Group Limited (PGL), 'the Applicant'.

### 1.2 The Review Process

- 1.2.1 This report constitutes the IRR, which collates the findings of the review of the specific ES topic chapters and standalone reports commissioned by Buckinghamshire Council. For the chapter reviews, **Section 2** of the report provides a list of clarifications and potential Regulation 25 information requests required from the Applicant. Importantly, these are only potential Regulation 25s at this stage – this is to reflect the importance of these points, but also provides the Applicant with an opportunity to contest / respond.
- 1.2.2 For the review of the standalone reports, **Section 3** of the report provides a list of clarifications and action points requested from the Applicant.
- 1.2.3 Should the application proceed, the Applicant may respond to the IRR providing further information on the potential Regulation 25 requests, actions points and clarifications as necessary. These will then be considered by Buckinghamshire Council and Temple. A Regulation 25 request will be raised where it is considered that without the missing information the ES is deemed to be deficient in terms of the EIA Regulations and that inclusion of the information has the potential to alter the assessment of significant effects.
- 1.2.4 If it is deemed that information requested in the IRR remains outstanding the Applicant will be informed in writing. Without this information the ES is not considered to be complete. If the planning application were to be determined without this information, it could only be refused.
- 1.2.5 Mitigation measures are relied upon in the ES to limit or remove any significant adverse environmental effects. It is the Council's responsibility to ensure that any required mitigation is secured. To assist with this, the Temple Team have identified the mitigation measures relied upon in the chapters that Temple have reviewed in **Table 5.1** – this includes both mitigation that forms part of the scheme for approval, and that that needs to be secured e.g. via condition or planning obligation.

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## 2.0 ES CHAPTER REVIEWS

### 2.1 CHAPTER 7: LANDSCAPE AND VISUAL

#### *Policies, Guidance, Legislation and Standards*

- 2.1.1 The LVIA chapter does not reference relevant landscape-related planning policies at either national or district level. It also does not reference landscape strategies identified in published landscape character assessments and green infrastructure studies.
- 2.1.2 Paragraph 7.6 notes that the assessment is based on the Guidelines for Landscape and Visual Impact Assessment<sup>1</sup> (GLVIA3). The chapter should also refer to:
- Photography and Photomontage in Landscape and Visual Impact Assessment - Landscape Institute Advice Note 01/11 (March 2011); and
  - Visual representation of development proposals, Landscape Institute Technical Guidance Note (TGN) 02/17 (March 2017).
- 2.1.3 As noted in paragraph 7.6, there is no legislation covering landscape and visual impact assessment.

#### *Assessment Methodology and Significance Criteria*

- 2.1.4 The various stages for undertaking a landscape and visual impact assessment, as set out in the study methodology (paragraph 7.20 to 7.33), are broadly in accordance with best practice guidance in GLVIA 3.
- 2.1.5 The criteria used to define magnitude of landscape and visual change are not particularly detailed but adequately cover what is required.

#### *Baseline Conditions*

- 2.1.6 Night-time conditions are not described in the landscape baseline section (paragraph 7.34 to 7.38).
- 2.1.7 The identification of the eastern site boundary hedgerow as being in poor condition (paragraph 7.37) is not a fair judgement based on the overall findings of the Tree Survey and Arboricultural Impact Assessment.
- 2.1.8 Reference is made in paragraph 7.38 to the Colne and Crane Green Infrastructure Strategy. The objectives of this strategy should be set out.
- 2.1.9 Reference is made in paragraph 7.43 to the Colne Valley Regional Park. The objectives of this regional park should be identified.
- 2.1.10 The descriptions of landscape character, as extracted from the most relevant published landscape character assessments, are limited to landscape and visual sensitivities. Identification of 'key characteristics' and a description of each LCA would have provided the reader with a better understanding of the landscape resource and its value. The

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<sup>1</sup> Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA 3), by the Landscape Institute and Institute of Environmental Management and Assessment, (2013).

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vision, strategy and landscape guidelines for the character areas in the published landscape character assessments (Iver Heath Mixed Use Terrace LCA and Iver Heath Terrace LCA) should also be identified, as appropriate. The correct reference for the IverHeath Mixed Use Terrace LCA is LCA22.4, not LCA04.

- 2.1.11 The visual baseline section does not describe night-time views, nor does it assess the value attached to views.
- 2.1.12 Table 7.2: Representative Assessment Viewpoints is confusing in that it identifies 4 No. visual assessment viewpoints yet assessments are carried out for 10 No. visual receptors located across a wider area, as summarised in Table 7.3: Summary of Residual and Significant Effects.
- 2.1.13 The LVIA graphics are generally clear. However on Figure 7.1, the bridleway along the western site boundary has been masked out by the red line boundary, the 1km buffer should be marked as a 1km study area and the symbols for Public Rights of Way should be included in the legend. An annotated aerial photograph would be a useful additional graphic to allow the reader to more readily appreciate existing conditions.

## ***Assessment of Effects***

### **Construction**

- 2.1.14 Moderate adverse effects have been identified for a number of visual receptors during the construction phase but, unlike those identified in the operational phase, these have been assessed as non-significant due to their temporary nature.

### **Operation**

- 2.1.15 The assessment of landscape change has been correctly based on existing conditions that include mineral workings (paragraph 7.58). No assessment has been undertaken of likely effects based on the future baseline, with reference to the restoration plan for the minerals working site. **This is included as a potential Regulation 25 request in the summary table below.**
- 2.1.16 The magnitude of change assessment refers to the loss of vegetation types, the presence of new large-scale buildings, the increase in the built nature of the area, access points and road widening works. However, it does not assess the effects on any of the key landscape characteristics or landscape and visual sensitivities identified in the published landscape character assessments (e.g. *“long views over arable fields”*, *“undeveloped spaces/fields between areas of development which provide reminders of the former land use and origins of this landscape”*, and *“the hedgerow network, which provides visual unity and a wildlife corridor, connecting fragmented habitats”*). A finer-grain landscape assessment would enable fuller identification of effects at a local level. **This is included as a potential Regulation 25 request in the summary table below.**
- 2.1.17 The LVIA judgement for the Iver Heath Mixed Use Terrace LCA magnitude of change at Year 0 states that *“This LCA is typically settled and built development will not be out of place in this context”* (paragraph 7.58) needs to be justified in terms of the large-scale of the proposed buildings and the value of the existing fields. **This is included as a clarification in the summary table below.**

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- 2.1.18 GLVIA3 paragraph 6.31, p.113 notes that “*Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views.*” The high susceptibility of residents and recreational walkers to changes in their views is correctly identified in accordance with guidance set out in GLVIA3. However, the value of all views is identified as low in the LVIA (paragraph 7.66, 7.74, 7.82, 7.90, 7.99, 7.107, 7.115 etc). This value judgement has been made simply on the basis that the views are not designated or recognised in literature (see definition for low value view set out in LVIA Appendix 7.1, Table A7.1.2: Visual Sensitivity). However, low value views could be reasonably defined as those with elements that notably detract from the overall pleasantness of the view (e.g. degraded land, graffiti, or other discordant elements). Undistinguished or unremarkable views, which may not have any particularly distinctive components (either positive or negative) would still have intrinsic value and could be properly regarded as medium value views. This relatively low threshold of view value in the LVIA has resulted in relatively low findings for overall visual receptor sensitivity and this feeds into the significance of effect findings.
- 2.1.19 GLVIA3 paragraph 6.28 states that “*Consideration should be given to the seasonal differences in effects arising from the varying degree of screening and/or filtering of views by vegetation that will apply in summer and winter. Assessments may need to be provided for both the winter season, with least leaf cover and therefore minimum screening, and for fuller screening in summer conditions.*” The LVIA has not followed this best practice guidance and appears to have based the assessment on summer views. Paragraph 7.83 provides the only reference to how the views of the Proposed Scheme would differ during the winter months, stating that views would be obtained “*through the hedgerow in winter months*”. The magnitude of visual change judgements should all be based on ‘worst case’ winter views and are likely to result in higher magnitudes of change. **This is included as a clarification in the summary table below.**
- 2.1.20 The bridleway along the eastern edge of Black Park abuts a 480m section of site boundary and passes at a close distance to other sections as it veers southwest into the woodland. The bridleway is approximately 2.2km long from the A412 (Uxbridge Road) to Fulmer Common Road near the northern edge of Pinewood Studios. Approximately 1.1km of this north-south route through the woodland already abuts the tall security fence of Pinewood Studios with many open views of buildings to the rear. The Proposed Scheme will enclose views from the last remaining section of bridleway where there are eastward views from the woodland edge across open fields. It would result in an increase in the length of bridleway that is in close proximity to the security fence from approximately 1.1km to approximately 1.58km (71.8% of the route). The vertical and horizontal extent of the new built form would substantially enclose a high proportion of the existing view for those who appreciate the outward view from the woodland edge in the winter and summer of Year 1. Paragraph 7.67 describes this as “*a clearly perceptible change*” (which broadly aligns with the Table A7.1.4 definition for a medium level of visual change) rather than a “*large change in view, perhaps where a development is in close proximity to a direct line of vision, or affecting a substantial part of the view, or providing contrast with the existing view.*” (the Table A7.1.4 definition for a high level of visual change). It is likely that the proposed 10m wide (minimum) woodland buffer planting would not screen the ‘lower level elements’ of the Proposed Scheme in Year 15 winter views and that filtered views of the proposed buildings would be obtained. The LVIA is
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likely to be under-estimating the likely magnitude of visual change as a result. **This is included as a potential Regulation 25 request in the summary table below.**

- 2.1.21 The visual assessment for 'Users of Pinewood Road' states that it is likely that new entrances will be visible but this assessment does not take into account other urbanising features such as new road markings, lighting columns and signage, or the effects of hedgerow loss within vehicular sightlines at the proposed junctions. **This is included as a clarification in the summary table below.**
- 2.1.22 The visualisations prepared to inform the assessments of visual change have been based on the Green Infrastructure and Building Height Parameter Plan. It is surprising that the visualisations along Pinewood Road do not include the junctions required under the Access Parameter Plan. **This is included as a clarification in the summary table below.**
- 2.1.23 The LVIA has been based on the parameter plans and the information set out in Environmental Statement paragraph 4.20. The Green Infrastructure (GI) Parameter Plan states that the peripheral GI corridors will comprise boundary treatments and standoffs, protection of existing landscape features, provision of new/enhanced landscape and ecology with 10% minimum biodiversity net gain, and a strengthened landscape frontage along Pinewood Road. It specifies that a 15m depth of woodland planting will be provided adjacent to residential properties. Paragraph 7.52 identifies a proposed 10m minimum deep woodland alongside Black Park but this is not included in the LVIA assumptions (Paragraph 7.146) or the GI Parameter Plan. The photomontages do not reflect the GI Parameter Plan proposals and the visual impact mitigation shown on these photomontages cannot therefore be relied upon to inform the visual impact assessments. The LVIA can only take account of a very limited amount of woodland planting adjacent to residential properties as a robust visual enclosure mitigation measure. **This is included as a clarification in the summary table below.**

### ***Cumulative Effects***

- 2.1.24 The approach to assessing cumulative effects set out in Chapter 12 and Appendix 13.1 is considered appropriate.

### ***Mitigation and Monitoring***

#### **Construction**

- 2.1.25 Paragraph 7.51 states that standard good management practices will be adopted during the construction phase, and that these will be secured by a Construction Environmental Management Plan (CEMP), including:
- Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS827:2005 Trees in relation to construction);
  - Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS827:2005 Trees in relation to construction);



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- Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009); and
  - Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.

### Operation

2.1.26 Paragraph 7.52 states that the features of the Proposed Development that have been included with the specific purpose of minimising impacts on landscape and visual receptors (i.e. embedded design mitigation) include:

- Keeping building heights lower in proximity to visual receptors (and particularly residential receptors);
- Retaining all high and medium value trees with appropriate root protection buffers where possible, as identified by the Arboricultural Impact Assessment (see Appendix 7.2);
- Where vegetation losses are unavoidable (e.g. at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;
- Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;
- Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points will need punch through;
- Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;
- Within the green infrastructure buffer, and adjacent to Black Park where the PRoW is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;
- Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/ year);
- Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties. This is further detailed in Appendix 4.1 Outline Lighting Strategy.

- 2.1.27 It should be noted that building heights have not been kept lower in proximity to visual receptors using the bridleway alongside Black Park.
- 2.1.28 A Landscape and Ecological Management Plan should be prepared at Reserved Matters stage. This is included as an additional mitigation measure in **Table 5.1**.
- 2.1.29 There are no proposals for monitoring landscape and visual mitigation during the construction and operation of the Proposed Scheme, and none are considered appropriate.

### ***Residual Effects***

- 2.1.30 Residual short term significant effects are correctly summarised in LVIA 7.151 and are as follows:
- The inevitable landscape effect resulting from the change on Site from open fields to a developed area, within the Iver Heath Mixed Use Terrace LCA (moderate adverse at Year 0);
  - The visual effect on residents at Park Lodge Farm in the early years of operation before the planting mitigation matures to screen views (moderate-major adverse Year 0);
  - The visual effect on the local community to the east of Pinewood Road in the early years of operation before the planting mitigation matures to screen views (moderate adverse Year 0);
  - The visual effect on the residents at Royal Lodge/Park Lodge in the early years of operation before the planting mitigation matures to screen views (Moderate-major adverse at Year 0);
  - The visual effect on the local community to the west of Pinewood Road in the early years of operation before the planting mitigation matures to screen views (moderate adverse Year 0); and
  - The visual effect on users of Pinewood Road in the early years of operation before the planting mitigation matures to screen views (moderate adverse Year 0).
- 2.1.31 Residual long term significant effects are correctly summarised in paragraph 7.152 and are as follows:
- The inevitable landscape effect resulting from the change on Site from open fields to a developed area, within the Iver Heath Mixed Use Terrace LCA (moderate adverse at Year 15); and
  - The visual effect on the residents at Royal Lodge/Park Lodge as a result of being surrounded by new woodland belts beyond which are relatively large buildings potentially at a minimum of 50-80m away (Moderate adverse at Year 15 for layout PP3A, or moderate-major adverse at Year 15: for layout PP3B).

### ***Commentary on the Conclusions of the ES***

- 2.1.32 The landscape and visual impact assessment broadly follows the methodology set out in paragraphs 7.20 to 7.33.

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- 2.1.33 The landscape impact assessment does not tease out what is important in the local landscape, what sensitivities are affected and what key characteristics are lost. However, in spite of this lack of detail and transparency, this review agrees with the LVIA conclusion of a moderate adverse impact on the Iver Heath Mixed Use Terrace LCA at Year 15.
- 2.1.34 This review considers that the magnitude of visual change has been under-reported in many cases due to the use of a relatively low threshold for defining view value. The visual impact assessment does not fully identify the changes to existing views, particularly in the case of views from the Black Park bridleway and Pinewood Road as noted above.
- 2.1.35 The photomontages are based on an assumption that tree and shrub vegetation will be established across the length and depth of the GI corridors identified on the GI Parameter Plan. This assumption is incorrect as the GI Parameter Plan states, amongst other things, that the peripheral GI corridors will comprise boundary treatments and standoffs, protection of existing landscape features, provision of new/enhanced landscape and ecology with 10% minimum biodiversity net gain. The GI Parameter Plan only delivers a 15m depth of woodland planting adjacent to residential properties. The reference to a strengthened landscape frontage along Pinewood Road, whether it be an infilled hedgerow or a new tree/shrub belt, does not provide sufficient detail for any photomontage modelling or additional visual enclosure that could properly be taken into account in the visual impact assessment.

### ***Commentary on the Adequacy of NTS***

- 2.1.36 The landscape and visual section of the NTS clearly identifies all the significant effects identified in the LVIA chapter. The purpose of the peripheral belt of green infrastructure is not restricted to the delivery of vegetation for screening purposes and additional detail would be helpful so that it is more easily understood by the general public.
- 2.1.37 The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of significant effect falls from Year 0 to Year 15 should also be provided. **This is included as a potential Regulation 25 request in the summary table below.**

<b>Summary of Clarifications Required</b>
<ol style="list-style-type: none"> <li>1. Justify the magnitude of change at Year 0 in terms of the large-scale of the proposed buildings and the value of the existing fields.</li> <li>2. Identification of visual effects based on 'winter' views.</li> <li>3. Identification of hedgerow loss along Pinewood Road resulting from proposed junctions and vehicular sightlines.</li> <li>4. Amendments to photomontages to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.</li> <li>5. Revisions to the landscape and visual impact assessment to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.</li> </ol>
<b>Summary of Potential Regulation 25 Information Requests</b>
<ol style="list-style-type: none"> <li>6. Assess the likely effects based on the future baseline, with reference to the restoration plan for the minerals working site.</li> <li>7. Preparation of a local landscape character area to better inform identification of landscape effects.</li> <li>8. Provide justification as to the level of the effect in Year 15 with specific reference to the effectiveness of the woodland buffer in winter.</li> <li>9. The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of significant effect falls from Year 0 to Year 15 should also be provided.</li> </ol>

## 2.2 Chapter 10: Climate Change

### *Policies, Guidance, Legislation and Standards*

- 2.2.1 The chapter identifies the Climate Change Act 2008 (updated in 2019) as setting a legally-binding target for the UK to reduce its CO2 emissions. It notes that South Bucks District Council (SBDC) and Buckinghamshire County Council have both declared a climate emergency in September 2019, although it is not yet clear if and how this will translate into policy changes for the built environment.
- 2.2.2 The Council's adopted Core Strategy is cited as 'include(ing)' a number of policies which reference climate change, including Core Policy 8 and Core Policy 12. This implies that there are further policies or planning guidance relevant to climate change which have not been stated. **This is added as a clarification point in the table below.**
- 2.2.3 In terms of guidance, the Applicant has identified the IEMA Principles Series: Climate Change Mitigation and EIA, the IEMA EIA Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance and the IEMA EIA Guide to: Climate Change Resilience and Adaptation. It should be noted that the latter IEMA guidance has been superseded in June 2020, and this relates to a potential Regulation 25 request below.

### *Assessment Methodology and Significance Criteria*

- 2.2.4 The chapter covers both climate change mitigation (GHG reduction) and climate change adaptation and resilience (the sensitivity of the project to a changing climate). The scope of the assessment was not agreed through a formal EIA Scoping process, but some justification provided as to scoping out an assessment of climate adaptation and resilience has been provided.

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- 2.2.5 With respect to climate change adaptation/resilience, whilst the reviewer does not necessarily disagree with the justification of showing how extreme weather has been accounted for in the emerging scheme design, the assessment does not clearly follow the IEMA guidance identified in the chapter (which has been updated in June 2020). The correct guidance should be applied to the assessment, including providing a distinction between climate vulnerability and in-combination climate effects, as it is not clear whether the effects identified in other parts of the ES could become significant in the presence of UKCP18 projections. **This is provided as a potential Regulation 25 in the table below.**
- 2.2.6 With respect to climate change mitigation, this includes an assessment of GHG emissions associated with the construction and operation phases under 'scope 1, 2 and 3' of the GHG Protocol, compared against an existing and future baseline. This is considered appropriate and good practice, although there are some notable sources of emissions that have not been included, as described below.
- 2.2.7 The sensitivity of the receptor (the Earth's climatic system) is considered to be high, which is agreed. Criteria for the magnitude of change is set out in Table 10.4 which identifies thresholds for different categories of impact as being >5%; 3-5%; 1-3%; and <1%, relative to local / regional baseline emissions and future UK Carbon Budgets.
- 2.2.8 Major and moderate effects are considered significant, minor effects may be significant but subject to professional judgement and negligible effects are not significant.

### Construction

- 2.2.9 The construction phase emissions are assessed between 2022 and 2024, to reflect the proposed programme. GHG emissions associated with construction activities have been based on construction benchmark factors from the Royal Institute of Chartered Surveyors (RICS) embodied carbon guidance (1,400 kgCO<sub>2</sub>e per £100k project value).
- 2.2.10 GHG emissions associated with embodied carbon in building materials are based on benchmarked emissions per unit of development area, in accordance with RICS 2014 Embodied Carbon methodology. Estimates of construction waste emissions have been calculated based on benchmarks provided by BRE's 2012 Waste Benchmark Data. This is considered acceptable.

### Operation

- 2.2.11 The operational assessment is made against the year 2022, which reflects a worst-case assessment due to grid and transport related emissions being considered to reduce over the lifetime of the development.
- 2.2.12 It is agreed that GHG emissions generated as a result of mains water consumption, wastewater treatment, are likely to be small compared to emissions from energy consumption and can be excluded from the assessment, although RICS guidance is available to help quantify this. However, there is no evidence to justify the exclusion of emissions from the transport and treatment of waste, given that the scheme will attract 2 million visitors annually, many of whom would be expected to drive. It is requested that the Applicant takes this into account and estimates emissions associated with the operational servicing activities and traffic related emissions from the c. 2 million annual visitors. **This is provided as a potential Regulation 25 in the table below.**
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- 2.2.13 Paragraph 10.67 states that “An estimate of the annual energy demands for the Proposed Scheme has been prepared based on benchmark figures from similar schemes”. Clarification is required as to why indicative operational emissions have not been based upon the supporting Energy Strategy for the Proposed Development. **This is added as a clarification point in the table below.**

### **Baseline Conditions**

- 2.2.14 Paragraphs 10.39 to 10.41 describes the baseline emissions from the site (34.4ha of mainly arable land) and have assumed them to be zero. This is considered acceptable, as it provides a reasonable worst-case position against which to consider the net change in emissions.
- 2.2.15 Table 10.6 shows the Local Authority emissions for 2018, against which the Proposed Development’s emissions would be contextualised. Table 10.7 describes the various UK Carbon Budgets, used to show how much budget the UK has allowed for under the operational and construction phases. Paragraphs 10.47 to 10.49 describe the future baseline appropriately.

### **Assessment of Effects**

- 2.2.16 The assessment of effects is made following the adoption of primary mitigation described below and is based on an estimate GHG emissions resulting from the construction and operation of the Proposed Development and to evaluate these emissions within the context of GHG emissions at a range of geographical scales including recent emissions from the local area (SBDC administrative area), the region (South Buckinghamshire) and to future carbon budgets for the UK as a whole.

### **Construction**

- 2.2.17 Paragraphs 10.51 to 10.53 describes the primary mitigation associated with the construction phase, that will be set out in the Site Waste Management Plan and Construction Environmental Management Plan, although at this stage, the effectiveness of these measures cannot reasonably be quantified.
- 2.2.18 Following the RICS guidance, Table 10.8 shows that the estimated construction site emissions would be approximately 5,600 tCO<sub>2</sub>e. Table 10.9 shows that estimated embodied carbon would be approximately 39,739 tCO<sub>2</sub>e. Table 10.10 estimates emissions associated with transportation of waste generated as being 74 tCO<sub>2</sub>e. Table 10.11 shows the total construction phase emissions to therefore be 46,113 tCO<sub>2</sub>e.
- 2.2.19 Table 10.12 refers back to the categories of impact magnitude, and the percentages of construction phase emissions in the context of the UK Carbon budget, Buckinghamshire and South Bucks emissions. In this context, the Proposed Development will clearly be very small against the whole UK carbon budget, but largest against the context of the most local levels in SBDC. This is the most appropriate context against which to compare the impacts, and it is shown this will be above 3% (3.07%) of that, which falls into the medium magnitude category shown in Table 10.4. The assessment states this magnitude (paragraph 10.63) as small, and therefore seems to be understating the effect as minor and arguing a not-significant effect. It is considered that the IEMA guidance and the methodology both point to the fact that a significant effect is expected, and therefore this



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either needs to be updated, or clarification provided as to why there seems to be an anomaly. **This is provided as a potential Regulation 25 in the table below.**

### Operation

- 2.2.20 The Proposed Development will incorporate the following primary mitigation for operational energy efficiency and carbon reduction:
- A “fabric first” approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2013;
  - 100% low energy (LED) lighting;
  - High efficiency gas boilers or low carbon heat pumps where heating is required; and
  - 10% of the site’s energy delivered through low carbon renewable energy.
- 2.2.21 Table 10.13 identifies year 1 to year 30 operational emissions reducing over time to reflect the decarbonisation of the grid, which is considered acceptable. It provides a cumulative 30 year (2022-2050) GHG emissions as being 31,296 tCO<sub>2</sub>e. It should be clarified whether this actually accounts for 28 years, given the stated timescales, and what the assumed operational life is for the scheme. **This is added as a clarification point in the table below.**
- 2.2.22 This operational GHG emission is included in Table 10.14, alongside ‘process GHG emissions’, although clarification is required to explain what this includes and how it is calculated. **This is added as a clarification point in the table below.**
- 2.2.23 Table 10.15 identifies the combined operational emissions against the local total emissions and UK budgets. This identifies that operational emissions would in all cases be less than 1% and therefore lead to a negligible effect.

### **Cumulative Effects**

- 2.2.24 Paragraphs 13.26-13.26 briefly describe the cumulative effects of the Proposed Development with other identified third-party schemes. The assessment appears to have considered the emissions associated with other schemes as part of projections of future emissions and carbon budgets at a local and national scale and considers in-combination effects as being accounted for within these targets and the individual project assessment. Whilst it is understood that there is a limitation to being able to quantify the emissions associated with the identified cumulative schemes, it is considered that the appropriate method should be to consider the net change in emissions compared to the baseline for the Proposed Development plus the cumulative schemes, against the same set of significance criteria as used in the rest of the assessment and using broad and clear assumptions. The significance of the cumulative effects should also be stated. **This is included as a potential Regulation 25 information request in the table below.**
- 2.2.25 Furthermore, with respect to the earlier comments on climate change adaptation, the June 2020 IEMA Guidance requires the consideration of in-combination effects of how the other EIA impacts could be altered by a changing climate. This is already included as a potential Regulation 25 information request in paragraph 2.2.5 above.

## ***Mitigation and Monitoring***

### **Construction**

- 2.2.26 No further mitigation is proposed beyond what is outlined as primary mitigation. Whilst it is acknowledged that limited details are available at this stage, more details are required as to how carbon will be reduced and monitored in later design and construction stages. **This is added as a clarification point in the table below.**

### **Operation**

- 2.2.27 No further mitigation is proposed in relation to operational GHG emissions. The Applicant states “*while additional mitigation could be applied and reduce emissions this would be unlikely to result in an overall beneficial effect*”. In order for this statement to be valid, the Applicant should demonstrate zero emissions baseline and then any reduction in GHG emissions would justify further mitigation and should be included within the ES. **This is included as a potential Regulation 25 information request in the table below.**
- 2.2.28 Information is required as to how operational traffic and servicing emissions can be mitigated, and how the development of other energy reduction measures will be implemented in future design stages. This is included as part of the potential Regulation 25 described above, and not repeated here.

### ***Residual Effects***

- 2.2.29 The Applicant identifies a minor adverse effect from construction phase emissions and a negligible effect from operational emissions. Due to the points raised above in this review, it is considered that the effects are understated, and should be updated. This is not therefore raised as a separate clarification/Regulation 25 request, but inherent in some of those above.

### ***Commentary on the Conclusions of the ES***

- 2.2.30 As above, the conclusions appear to understate the effects, and therefore avoid identifying potentially significant effects. The stated assumptions and limitations are acknowledged, given the design stage currently, but the Applicant has further opportunities for further mitigation and this should be clarified in the conclusions. This is not therefore raised as a separate clarification/Regulation 25 request, but inherent in some of those above.



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## **Commentary on the Adequacy of NTS**

- 2.2.31 The NTS should be updated considering the points raised above. It should also explain the assessment of climate change adaptation and resilience. **This is provided as a potential Regulation 25 in the table below.**

<b>Summary of Clarifications Required</b>
<ol style="list-style-type: none"><li>1. Clarify if there are any other local policies relevant to climate change.</li><li>2. Have the operational energy figures been obtained from benchmarked data from other schemes or from the scheme's Energy Strategy?</li><li>3. Clarify the proposed operational design life for the scheme and clarify whether the assessment is of 28 or 30 years.</li><li>4. Clarify what data the process emissions are based on.</li><li>5. Provide more details as to how carbon will be reduced and monitored in later design and construction stages.</li></ol>
<b>Summary of Potential Regulation 25 Information Requests</b>
<ol style="list-style-type: none"><li>6. Provide a more systematic assessment of climate change adaptation and resilience impacts, in alignment with the June 2020 IEMA Guidance.</li><li>7. Provide an estimate of GHG emissions associated with the transportation of c. 2 million visitors and associated servicing of the scheme, and update overall residual effects accordingly.</li><li>8. The residual construction phase effect is greater than the threshold for medium magnitude impact at the SBDC scale, which is inconsistent with the low category stated and avoids stating a significant effect.</li><li>9. State the significance of the cumulative effects.</li><li>10. The Applicant should further justify why operational mitigation measures are not proposed.</li><li>11. Update the NTS to reflect the comments and include all significant effects and a description of climate change adaptation/resilience.</li></ol>

## **2.3 CHAPTER 11: Air Quality**

### ***Policies, Guidance, Legislation and Standards***

- 2.3.1 Air quality legislation, guidance and standards used to inform the assessment are appropriate although there is no reference to the National Planning Policy Framework and Planning Practice Guidance which should both be included within the Chapter. **This is included as a clarification in the table below.**

### ***Assessment Methodology and Significance Criteria***

- 2.3.2 Information is not provided on consultation with South Bucks District Council or Slough Borough Council regarding the scope and methodology for the assessment. In addition, Scoping Opinion comments are not provided. The Applicant should clarify whether consultation on the scope and methodology of the assessment was undertaken and include this information (including how comments were addressed) within the Chapter. **This is included as a clarification in the table below.**
- 2.3.3 Two study areas have been assessed - Pinewood where the Proposed Development is located and Slough which is over two miles away. It is not clear why roads in Slough were assessed – presumably because they are affected by the Proposed Development. An explanation should be provided within the assessment as to why Slough has been assessed and clarification is required as to whether roads between the two study areas are affected (i.e. meet the EPUK/IAQM screening criteria). If these roads are affected and there is

relevant public exposure, then they should be included within the assessment. **This is included as a clarification in the table below.**

### Construction

- 2.3.4 The methodology and significance criteria used to assess construction dust risk are acceptable.
- 2.3.5 Paragraphs 11.8 and 11.9 outline effects which are not significant – these effects are normally scoped out of the EIA. Paragraph 11.10 states that the *'effects of dust and particulate matter emissions on nearby residential receptors are unlikely to be considered significant and will not be considered within the ES'* and then states that a construction dust assessment is included in Appendix 11.2. The effects of construction dust have therefore been considered within the ES and Paragraph 11.10 should be amended accordingly to avoid confusion. **This is included as a clarification in the table below.**
- 2.3.6 The significance criteria used to assess vehicle exhaust emissions associated with the construction phase are acceptable. The methodology used is largely appropriate however further information is required in relation to roads included within the assessment, model verification, and treatment of roundabouts and junctions within the dispersion model. These also apply to the Operational Phase assessment and are outlined in paragraphs 2.3.9 to 2.3.14 below.

### Operation

- 2.3.7 The methodology and significance criteria used to assess air quality impacts on designated nature conservation sites are acceptable.
- 2.3.8 The significance criteria used to assess vehicle exhaust emissions associated with the operational phase are acceptable. The methodology used is largely appropriate however further information is required as outlined below.
- 2.3.9 Within both study areas sensitive receptors were included within the dispersion model which are within 200 m of roads that have not been included within the model. Predicted pollutant concentrations at these receptor locations are therefore unlikely to be correct. This applies to the following receptors:
- E18, E19 and E29: Bangors Road South and Slough Road East of the roundabout are not included in the model;
  - E9 and E32 (and possibly E10): The M25 is not included in the model;
  - E38 and E39: The A4 east of the roundabout is not included in the model;
  - E42: William Street is not included in the model;
  - E46, E47, E48 and E50: Farnmham Road is not included in the model; and
  - E52 and E53: Church Street and Cippenham Lane are not included in the model.
- 2.3.10 The dispersion model should be updated to include all roads likely to affect pollutant concentrations within 200 m of sensitive receptors. The model should be rerun, and pollutant concentrations reassessed. **This is included as a potential Regulation 25 information request in the table below.**

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- 2.3.11 Model verification for the Pinewood study area is acceptable however verification for the Slough study area is not acceptable as it used monitoring sites within 200 m of roads that have not been included in the model, and also kerbside monitoring sites (Turns Lane, Windmill, and Wellington Street) which are not recommended for the adjustment of road traffic modelling.
- 2.3.12 The Applicant should redo model verification for the Slough study area to only include monitoring sites where all roads likely to affect pollutant concentrations within 200m of the site are modelled, and to exclude kerbside monitoring sites (unless kerbside sites are relevant for exposure). **This is included as a potential Regulation 25 information request in the table below.**
- 2.3.13 Paragraph 11.21 states that *'receptors have been chosen to represent worst case public exposure at locations adjacent to roads that will see a change in traffic flow as a result of the Proposed Scheme'*. However, receptors E38 and E39 are not representative of worst-case exposure as there are sensitive receptors closer to the roundabout. The Applicant should review all sensitive receptors modelled to ensure that they are representative of worst-case public exposure and model pollutant concentrations at additional receptors if worst case exposure has not been assessed. **This is included as a potential Regulation 25 information request in the table below.**
- 2.3.14 Within the Slough study area some roundabouts appear to have been modelled as junctions. In addition, not all road links (and slip roads) at roundabouts and junctions have been included in the model. This will affect predicted pollutant concentrations at receptors located close to these roundabouts and junctions. The Applicant should review all junctions and roundabouts modelled to ensure that all road links (and slip roads) at roundabouts and junctions are included in the model and that roundabout and junction layouts within the model are correct. The model should be rerun, and pollutant concentrations reassessed. **This is included as a potential Regulation 25 information request in the table below.**

### **Baseline Conditions**

- 2.3.15 Paragraph 11.46 reports that PM<sub>10</sub> objectives were achieved at all automatic monitoring stations in Slough in the last five years, however monitoring results are not reported. The Applicant should include PM<sub>10</sub> monitored concentrations within the baseline assessment. **This is included as a clarification in the table below.**
- 2.3.16 Clarification is required as to whether PM<sub>2.5</sub> is monitored by Slough Borough Council. The Applicant should include PM<sub>2.5</sub> monitored concentrations within the baseline assessment if data are available. **This is included as a clarification in the table below.**
- 2.3.17 Information is not provided on how Defra background maps compare to monitored background concentrations within Buckinghamshire Council and Slough Borough Council and therefore whether the Defra background concentrations used in the assessment are representative. However, this is unlikely to alter the assessment conclusions.

### **Assessment of Effects**

#### **Construction**

- 2.3.18 The dust risk assessment of earthworks, construction, and trackout activities during the construction phase is acceptable.

- 2.3.19 Clarification is required as to whether the building onsite adjacent to Pinewood Road will be demolished as demolition activities are not included in the dust risk assessment. If demolition activities are planned the dust risk assessment will need to be revised. **This is included as a clarification in the table below.**
- 2.3.20 Figure A11.1 shows distance bands from the site boundary, however distances between the site boundary and the following sensitive receptors are not shown: Pleasant Cottage Guest House, Pinewood Manor & Goosebarry Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings. This will not alter the dust risk assessment conclusions as the sensitivity of the area is likely to remain the same (Table A11.9), however Figure A11.1 needs to be updated. **This is included as a clarification in the table below.**
- 2.3.21 Paragraph 11.77 reports that '*the construction phase of the Proposed Scheme results in an overall decrease in traffic flows on some road links within the Study Areas*'. Clarification is required within the assessment as to which roads experience a decrease in traffic flows during the construction phase and why. **This is included as a clarification in the table below.**

#### Operation

- 2.3.22 The assessment of air quality impacts on Kingcup Meadows and Oldhouse Wood SSSI is acceptable.
- 2.3.23 Full results from the 'Further Assessment' Do Minimum +SHR scenario outlined in paragraph 11.100 are not provided and should be included within Appendix 11. **This is included as a clarification in the table below.**
- 2.3.24 Paragraph 11.120 mentions '*the magnitude of change*' in relation to the exposure of future users of the Proposed Scheme to pollutant concentrations exceeding the relevant air quality objectives. However, as the assessment only considers pollutant concentrations for the opening year 'magnitude of change' is not relevant. Paragraph 11.120 should be amended to remove 'magnitude of change' which is not relevant to the assessment. **This is included as a clarification in the table below.**

#### **Cumulative Effects**

- 2.3.25 The operational phase assessment does not account for changes in traffic flows resulting from any committed and allocated developments within the Local Plan. However, a cumulative assessment was undertaken in Chapter 13: Assessment of cumulative effects.
- 2.3.26 The cumulative effects assessment predicts the annual mean NO<sub>2</sub> impact at ground floor as being negligible at 51 receptors, slight adverse at four receptors, moderate adverse at one receptor and substantial at one receptor.
- 2.3.27 The operational phase assessment predicts the annual mean NO<sub>2</sub> impact at ground floor as being negligible at 53 receptors, slight adverse at one receptor, moderate adverse at one receptor, moderate beneficial at one receptor and substantial beneficial at one receptor.

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## ***Mitigation and Monitoring***

### **Construction**

- 2.3.28 Mitigation of construction dust is proposed through implementation of mitigation measures through a Dust Management Plan as part of a Construction Environmental Management Plan. The proposed construction dust mitigation measures outlined in Appendix 11.2 are adequate, however they need to be cross referenced in the 'Secondary Mitigation or Enhancement' section of Chapter 11. **This is included as a clarification in the table below.**
- 2.3.29 It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.
- 2.3.30 It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.

### **Operation**

- 2.3.31 Supplementary mitigation for the operational phase is not proposed. Mitigation may be required during the operational phase pending the outcome of information requests in the table below.

### ***Residual Effects***

- 2.3.32 Residual effects are discussed in paragraphs 11.88 to 11.90, however as no mitigation is proposed this text should be amended to avoid confusion and readers should be referred to the conclusions in paragraph 11.85. **This is included as a clarification in the table below.**

### ***Commentary on the Conclusions of the ES***

- 2.3.33 Clarifications are required in line with the comments above to determine whether the conclusions of the ES are appropriate.

### ***Commentary on the Adequacy of NTS***

- 2.3.34 The NTS does not include the results of the construction dust assessment. The NTS should include these results. **This is included as a clarification in the table below.**

#### **Summary of Clarifications Required**

12. There is no reference to the National Planning Policy Framework and Planning Practice Guidance which should both be included within the Chapter.
13. Clarify whether consultation on the scope and methodology of the assessment was undertaken and if it was this information should be included within the Chapter.
14. Paragraph 11.10 states that the '*effects of dust and particulate matter emissions on nearby residential receptors are unlikely to be considered significant and will not be considered within the ES*' and then states that a construction dust assessment is included in Appendix 11.2. The effects of construction dust have therefore been considered within the ES and Paragraph 11.10 should be amended accordingly to avoid confusion.
15. An explanation should be provided within the assessment as to why Slough has been assessed and clarification is required as to whether roads between the two study areas are affected (i.e. meet the EPUK/IAQM screening criteria). If these roads are affected and there is relevant public exposure, then they should be included within the assessment.
16. The Applicant should include PM10 monitored concentrations within the baseline assessment.
17. Clarification is required as to whether PM2.5 is monitored by Slough Borough Council. The Applicant should include PM2.5 monitored concentrations within the baseline assessment if data are available.
18. Clarification is required as to whether the building onsite adjacent to Pinewood Road will be demolished as demolition activities are not included in the dust risk assessment. If demolition activities are planned the dust risk assessment will need to be revised.
19. Figure A11.1 needs to be updated to show distance bands to Pleasant Cottage Guest House, Pinewood Manor & Goosebary Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings.
20. Clarification is required within the assessment as to which roads experience a decrease in traffic flows during the construction phase and why.
21. Full results from the 'Further Assessment' Do Minimum +SHR scenario outlined in paragraph 11.100 are not provided and should be included within Appendix 11.
22. Paragraph 11.120 should be amended to remove 'magnitude of change' which is not relevant to the assessment.
23. Residual effects are discussed in paragraphs 11.88 to 11.90, however as no mitigation is proposed this text should be amended to avoid confusion and readers should be referred to the conclusions in paragraph 11.85.
24. The proposed construction dust mitigation measures outlined in Appendix 11.2 are adequate, however they need to be cross referenced in the 'Secondary Mitigation or Enhancement' section of Chapter 11.
25. The NTS should include result of the construction dust assessment.

#### **Summary of Potential Regulation 25 Information Requests**

26. The dispersion model should be updated to include all roads likely to affect pollutant concentrations within 200 m of sensitive receptors. The model should be rerun, and pollutant concentrations reassessed.
27. The Applicant should redo model verification for the Slough study area to only include monitoring sites where all roads likely to affect pollutant concentrations within 200m of the site are modelled, and to exclude kerbside monitoring sites (unless kerbside sites are relevant for exposure).
28. The Applicant should review all sensitive receptors modelled to ensure that they are representative of worst-case public exposure and model pollutant concentrations at additional receptors if worst case exposure has not been assessed.
29. The Applicant should review all junctions and roundabouts modelled to ensure that all road links (and slip roads) at roundabouts and junctions are included in the model and that roundabout and junction layouts within the model are correct. The model should be rerun, and pollutant concentrations reassessed.

## 3.0 ES COMPLIANCE REVIEW

3.1.1 This compliance review has considered the performance of the ES against the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Regulations are supported by case law and developed through judicial review. The reviewer is cognisant that the ES accompanies an Outline Planning Application with all matters reserved. Compliance is considered purely against the regulatory requirements; however commentary and ratings also reflect consideration of established good practice for outline applications and what information could reasonably be expected at this stage. Where the reviewer has raised concerns in the below table, the Applicant should consider the further details and respond to these.

**Table 3.1 Compliance with the EIA Regulations**

Specified Information	Compliance (Yes / Partial / No)	Further Details	Rating (Acceptable/ Concerns/ Unacceptable)
<p><b>Regulation 18.3(a) and Schedule 4(1)</b>                      Does the ES contain a description of the proposed development comprising information on:</p> <ul style="list-style-type: none"> <li>- The site;</li> <li>- Location;</li> <li>- Design;</li> <li>- Size parameters;</li> <li>- Physical characteristics, including land use</li> <li>- Demolition and construction activities;</li> <li>- Operational phase characteristics, such as energy demand and usage, natural and quantity of materials and natural resources (including water, land, soil and biodiversity) used;</li> <li>- Estimate of expected residue emissions such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste.</li> </ul>	<p>Partial</p>	<p>The ES accompanies an Outline Application with all matters reserved. Chapter 3 (Description of the Site and Surrounding Area) presents summary information on the site location with further detail in technical chapters. Supporting maps and illustrations are provided (including red line boundary extending to include Five Points Roundabout), as well as information on previous and current land use and proximity of designated sites.</p> <p>Chapter 4 (The Proposed Scheme) presents outline information on the proposals with maximum parameters stated for floorspace area for a visitor attraction, production studio and education and business hubs, number of parking spaces for car, coach and cycle and minimum area of green infrastructure (Table 4.1 and Figure 4.10). In addition, estimated operational visitor numbers are stated as 2 million per annum. No further information is presented at outline stage as to what form the visitor attraction or associated facilities will take.</p>	<p>Concerns</p>

		<p>The following issues were noted:</p> <ul style="list-style-type: none"> <li>• Figure 4.10 (PP7 Development numbers and yield) specifies area of the site as 32.6ha and specifies maximum area covered by parameter elements. However there is no figure by hectare provided for Education and Business Hubs. It is unclear if this is within the parameters of the production studio or additional, as the land uses do not sum to the figures of 32.6ha. Clarification is required as to the area (hectares) of the Education and Business Hubs in addition to floorspace stated.</li> <li>• Green Infrastructure parameter is stated as “no less than 9.8ha” (Table 4.1). However, Figure 4.10 specifies Green Infrastructure as 10.3ha. Further information is required to confirm correct parameters for green infrastructure.</li> <li>• In addition, Biodiversity Net Gain of “at least 10%” is specified. It should be noted that in terms of Biodiversity Net Gain it is more complex than simple area coverage of green infrastructure, with connectivity, nature and quality of habitat of primary importance to achieving percentage.</li> <li>• Whilst the notes in Figure 4.10 specify Black Park Buffer and Amenity Buffer ‘up to 30m wide’ no minimum parameter width is stated in the parameter table. Reference is made within paragraph 4.20 to a 25m buffer and “<i>along points of access, the green infrastructure boundary will be narrowed</i>” The parameter plans should make clear the minimum buffer width as well as the maximum to highlight the range.</li> <li>• Reference is made to minimum and maximum numbers of buildings within the visitor attraction and education and business hubs; however no figure is provided for the production studios. Clarification is required as to whether minimum/maximum number of buildings are fixed as a parameter as not specified on plans/figures submitted.</li> <li>• The ES states that the construction programme and phasing is not known at this time but “<i>could be built out over approximately 2 years...it may occur over a greater number of years, earliest practicable completion has been used within the EIA to establish a basis for assessments</i>”</li> </ul>	
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		<p><i>and sensible/worst case</i>" (paragraph 4.37) It should be noted that for some assessments a shorter timeframe results in less significant 'temporary' construction effects. The assessments should reflect the uncertainty as to the programme and phasing and reflect the worst-case scenarios if these are based on a longer than 2-year construction timeframe.</p> <ul style="list-style-type: none"> <li>The Applicant has scoped out consideration of waste as unlikely to have significant effects, however Schedule 4(1) of the EIA Regulations require that the ES should provide within the description of the proposals an estimate of the anticipated waste generated for both construction and operation phases. Whilst accepted that this is an outline application, and a waste strategy will be prepared at Reserved Matters stage; the Applicant should provide worst case parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.</li> </ul>	
<p><b>Regulation 18.3(b) and Schedule 4(4)</b> Does the ES contain a description of the likely significant effects of the proposed development on the environment from the construction, demolition and operational phases?</p>	<p>Yes</p>	<p>Within each of the technical chapters the predicted significance of effects are clearly stated in bold with equal prominence afforded to adverse and beneficial effects e.g. Table 7.3. Where scoped into the assessment this considers both construction and operational phases. No demolition works are anticipated.</p>	<p>Acceptable</p>
<p><b>Regulation 18.3(c) and Schedule 4(7)</b> Does the ES contain a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment in the construction and operational phases? This should include the extent to which they are avoided, prevented, reduced or offset.</p>	<p>Yes</p>	<p>The approach to mitigation within the assessments is outlined in Chapter 2 (paragraph 2.26). Within technical chapters mitigation measures are identified to avoid, reduce or offset the scale of impact and significance of effect. The measures are stated prior to determination of residual effects.</p> <p>Table 14.3 within Chapter 14 (Summary of ES and Schedule of Mitigation) presents a summary of various mitigation measures proposed in technical chapters, and by nature of the mitigation. The ES redacts information on secondary mitigation in the table. It is assumed this is in relation to protected species and is therefore appropriate.</p>	<p>Acceptable</p>

<p><b>Regulation 18.3(d) and Schedule 4(2)</b> Does the ES contain a description of the reasonable alternatives studied by the developer (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for the option chosen, including a comparison of the environmental effects?</p>	Yes	<p>Chapter 5 provides a brief summary of the alternatives considered by the applicant which are limited to 2 design options for the layout of the visitor attraction (Figure 4.4 and 4.5). The ES asserts that the alternative layouts only have implications for landscape and visual receptors with effects for each layout reported in Chapter 7. It is not clear from the ES whether a preferred layout option has been determined at this stage, however further detail on design iterations and related comparison of environmental effects would be required at reserved matters stage.</p> <p>Rationale for not considering alternative sites is stated and is appropriate. The future baseline development “do nothing alternative” is presented within the technical chapters.</p>	Acceptable
<p><b>Regulation 18.4(a)</b> Is the ES based on the most recent scoping opinion?</p>	N/A	<p>The Applicant undertook an internal scoping process, without provision of a scoping report or a request for a Scoping Opinion from the LPA. The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the scoping out of topics from further consideration. Sub topic issues scoped out are identified in the relevant technical chapter (e.g. Chapter 6 Socio-Economics and Human Health, paragraph 6.7). Whilst there is no requirement within the EIA Regulations for an applicant to have to consult at an early stage or request a Scoping Opinion it is the intention of the EIA Directive and established good practice that this is done.</p> <p>Concerns have been raised elsewhere in this compliance review as to the scope of the EIA.</p>	N/A
<p><b>Regulation 18.4(b)</b> Does the ES include reasonable data/information required to reach a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment?</p>	Yes	<p>Within technical chapters, and supported by appendices, survey data is presented that has been used to inform the assessments. The assessments use appropriate good practice methodologies, guidance and thresholds where appropriate to interpret the data and determine significance of effect e.g. Chapter 8 (Biodiversity) and Appendix 8.1.</p>	Acceptable
<p><b>Regulation 18.4(c)</b> Has the ES taken into account the results of any relevant UK environmental assessment, which are</p>	No	<p>Reference is made within the ES to a lapsed planning consent for 5 Ways Roundabout however no reference is made to any statutory or non-statutory environmental assessments previously undertaken for this application. No reference is</p>	Acceptable

<p>reasonably available, with a view to avoiding duplication of assessment?</p>		<p>made to any previous environmental assessment undertaken for ongoing remediation of minerals workings on site. However given the nature and location of the proposals, and the time lapse since completion of any other assessments the assessment would be unlikely to be duplicating work.</p>	
<p><b>Regulation 18.5.</b> Has a statement of competency been provided by the developer confirming that the ES has been prepared by competent experts and outlining their relevant expertise?</p>	<p>Yes</p>	<p>A Statement of Competency is provided within Appendix 1.2 that lists relevant qualifications and experience of both ES co-ordinators and topic specialists. All have appropriate professional qualifications for technical chapters authored.</p>	<p>Acceptable</p>
<p><b>Schedule 4(3)</b> Does the ES describe the current state of the environment and outline the likely evolution thereof without the proposed development on the basis of availability of environmental information and scientific knowledge?</p>	<p>Yes</p>	<p>Each technical chapter outlines both the current baseline and how the baseline would be anticipated to develop in the absence of the proposals. This is done through collation and interpretation of survey data using established good practice methodologies e.g. Chapter 9 (Transport) Table 9.4 and Appendix 9.3, and paragraph 9.49.</p>	<p>Acceptable</p>
<p><b>Schedule 4(4)</b> Has the ES identified factors likely to be significantly affected by the proposed development, including:  <ul style="list-style-type: none"> <li>- Population;</li> <li>- Human Health;</li> <li>- Land;</li> <li>- Soil;</li> <li>- Water;</li> <li>- Biodiversity (fauna and flora);</li> <li>- Air;</li> <li>- Climate;</li> <li>- Material assets;</li> <li>- Cultural Heritage; and</li> <li>- Landscape.</li> </ul> </p>	<p>Yes</p>	<p>The Applicant undertook an internal scoping process with topics scoped into the assessment as likely to be significantly affected clearly identified within the ES.</p> <p>The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the scoping out from further consideration within the EIA process the following topics:</p> <ul style="list-style-type: none"> <li>• Agricultural land (soils)</li> <li>• Archaeology (cultural heritage)</li> <li>• Built heritage (cultural heritage)</li> <li>• Water resources, Flood Risk and Drainage (water)</li> <li>• Lighting (population, human health and biodiversity)</li> <li>• Risk or Major Accidents and/or disasters</li> <li>• Materials and Waste</li> <li>• Ground conditions and contamination (soil)</li> </ul> <p>The rationale for scoping out of agricultural land, references previous soil quality on the site prior to mineral extraction activities, with no assessment of soil quality on the site (still</p>	<p>Concerns</p>

		<p>under restoration) provided. Buckinghamshire Council may have additional information on the quality or importance of agricultural soils on the site following the required restoration of the quarry activities to agricultural use. However, in principle the rationale appears sound.</p> <p>In relation to material assets no reference is made within the ES to the potential for further mineral reserves on or in proximity to the site. Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.</p>	
<p><b>Schedule 4(5)</b> Does the ES include a description of the likely significant effects from the proposed development resulting from</p> <ul style="list-style-type: none"> <li>- Construction and demolition activities;</li> <li>- Use of natural resources (land, soil, water, biodiversity);</li> <li>- Air pollution;</li> <li>- Noise;</li> <li>- Vibration;</li> <li>- Light;</li> <li>- Heat and radiation;</li> <li>- Nuisances;</li> <li>- Waste;</li> <li>- Cumulation of effects with other existing and approved developments;</li> </ul>	Partial	<p>The assessments of significance within technical chapters consider, where appropriate the different phases of the proposals and the direct and in-direct effects. The assessment has been tightly scoped with some elements identified as unlikely to be significant with implementation of standard mitigation for inclusion at reserved matters stage e.g. lighting strategy, waste strategy, CEMP etc. This approach is acceptable for outline applications and where relate to standard mitigation measures.</p> <p>Cumulative effects have been considered separately within Chapter 13 (Cumulative Effects Assessment) and consider both multiple effects of the proposals upon a receptor and effects of the proposals with other proposed/consented developments.</p>	Acceptable
<p><b>Schedule 4(6)</b> Does the ES contain a description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack</p>	Yes	<p>Limitations in the data or survey methods and any assumptions made in the assessments are highlighted within technical chapters e.g. Chapter 11 (Air Quality) Paragraph 11.124.</p>	Acceptable

of knowledge) encountered compiling the required information and the main uncertainties involved			
<p><b>Schedule 4(8)</b> Does the ES contain a description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU(3) of the European Parliament and of the Council or Council Directive 2009/71/Euratom(4) or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies</p>	Yes	The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the scoping out from further consideration within the EIA process of vulnerability of the development to risks of major accidents and/or disasters.	Acceptable
<p><b>Schedule 4(9)</b> Does the ES contain a non-technical summary (NTS) of the information provided under paragraphs 1 to 8.</p>	Yes	A stand-alone NTS has been provided under separate cover to facilitate consultation. It's presentation and content have given due consideration to the anticipated audience and reflect the contents of the main ES.	Acceptable
<p><b>Schedule 4(10)</b> Does the ES contain a reference list detailing the sources used for the descriptions and assessments included in the environmental statement.</p>	Yes	The ES provides references to all reports/studies/surveys/data sources used in the assessments presented within the ES using footnotes (e.g. Chapter 6 Socio-Economics and Health - References).	Acceptable

## **4.0 STANDALONE REPORTS REVIEW**

### **4.1 Sustainability Statement Review**

#### ***Scope of Review***

4.1.1 This review:

- Highlights the key national planning policies and Buckinghamshire Council local planning policies relating to sustainability.
- Reviews the Screen Industries Global Growth Hub Sustainability Statement against the key sustainability planning policies, taking into consideration the outline nature of the application.

4.1.2 This review has included a review of the following sections of the Sustainability Statement:

- Sustainable design
- Mitigating and adapting to climate change.

#### ***National Planning Policy***

4.1.3 The National Planning Policy Framework (NPPF) provides three overarching goals relating to economic, social and environmental objectives. They provide a framework by which local policies can achieve sustainable development.

#### ***Local Planning Policy***

4.1.4 As part of the validation requirements a Sustainability Statement is required to support planning applications, including Outline Applications. As a minimum the statement should cover the following aspects:

- set out the energy efficiency of the proposed development, covering both operational energy and CO<sub>2</sub> issues, and consideration of options for renewable energy;
- set out the environmental implications of the use of the building materials (and use of recycled materials) proposed in the development;
- show how use of sustainable drainage systems and water efficiency will be incorporated;
- show consideration for brownfield sites;
- show consideration for water manage, promoting resource efficiency;
- show how features of the site (e.g. topography and orientation) have informed sustainable design principles;
- show the predicted energy demand of the proposed development and the degree to which the development meets current energy standards; and
- where appropriate, include a Building Research Establishment Environmental Assessment Method (BREEAM) rating.

4.1.5 These requirements are supported by various local planning policies.

**South Bucks Local Development Framework, Core Strategy, Development Plan Document, Adopted February 2011**

4.1.6 Core Policy 7: Accessibility and Transport – This policy is expected to be addressed by the Transport Statement and as such has not been reviewed as part of this report.

4.1.7 Core Policy 12: Sustainable energy – 10% of the development's energy is to be secured from decentralised and renewable or low-carbon sources. Further guidance on how this be achieved is provided in the Sustainable Construction and Renewable Energy SPD.

4.1.8 Core Policy 14: Environmental and Resource Management – new development must be water efficient and include Sustainable Urban Drainage Systems, protect and enhance water quality, seek improvement in air quality and minimise noise impacts.

**Chiltern District Council Sustainable Construction and Renewable Energy Supplementary Planning Document, Adopted February 2015**

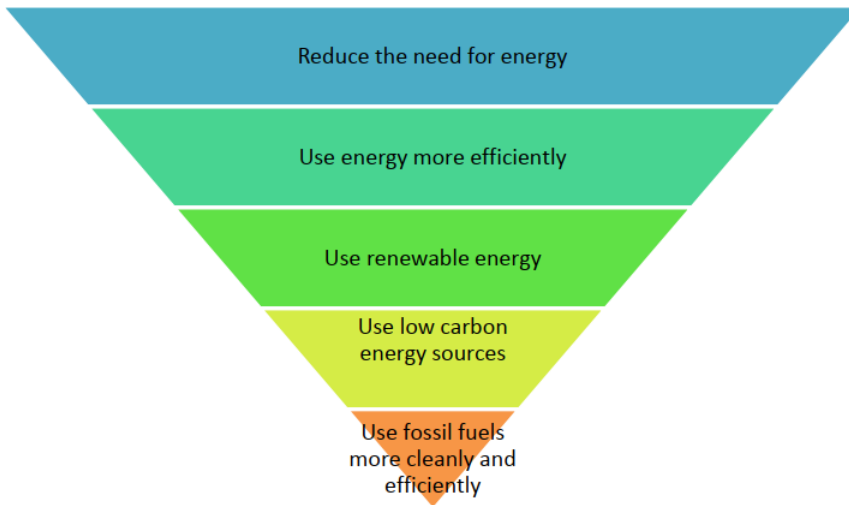
4.1.9 Applications made after 1st April 2020 should use the information on the planning validation webpage which includes the Chiltern Sustainable Construction SPD. The SPD summarises the policies which are relevant from the Core Strategy for Chiltern District, Local Development Framework, Adopted November 2011. The applicant has not referred to either the Sustainable Construction SPD or the Chiltern Core Strategy in their Sustainability Statement.

4.1.10 Policy CS4: ensuring that development is sustainable - To ensure long-term sustainability of development and help contribute towards national targets to reduce overall CO<sub>2</sub> emissions, the Council will expect all new developments to have regard to the sustainable development principles. Examples are provided in an appended table within the SPD and includes energy consumption, renewable and low carbon energy sources, water consumption and quality, flood risk and SuDS, air quality, noise, biodiversity and waste. This policy is broader and more robust than the policies sited in the South Bucks Core Strategy.

4.1.11 Policy CS5: Encouraging renewable schemes - 10% of a major development's energy requirements are to be delivered from decentralised and renewable or low carbon sources. The Council will also encourage the incorporation of combined heat and power schemes. requirements are to be sourced from decentralised and renewable or low-carbon sources. This policy is broadly aligned with Core Policy 14 of the South Bucks Core Strategy.

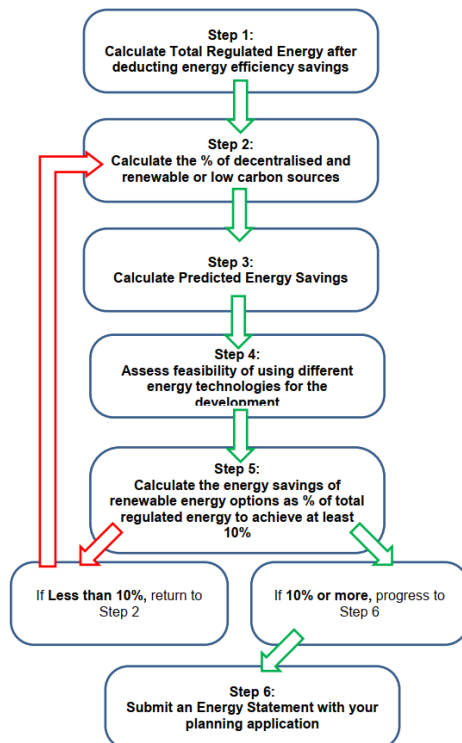
4.1.12 Although there is reference to BREEAM there is no formal requirement for an assessment to be undertaken.

4.1.13 The SPD encourages developments to follow the energy hierarchy in order to reduce its energy demand and achieve a low carbon development.



4.1.14 CS5 requires an Energy Statement to be produced for major developments. Given the application is an Outline Application the Energy Statement will need to show how the proposed development will achieve the requirements of Policy CS5 of the Core Strategy. Best estimates of energy use at outline application stage is acceptable.

4.1.15 The following flow chart summarises the content requirements for the Energy Statement.



4.1.16 There is no standalone energy statement provided to support the application but the energy efficiency proposals are captured within the Sustainability Statement.



**Draft Chiltern and South Bucks Local Plan 2036, June 2019**

- 4.1.17 The emerging Local Plan has not yet been adopted and has therefore got limited weight. However, it does show the council’s commitment to sustainable design and low carbon developments.
- 4.1.18 Policy DM DP5: Climate Responsive Development requires developments to demonstrate how they will respond to climate change and proposes the adoption of BREEAM certification (although not mandatory).
- 4.1.19 Policy DM DP6 Low Carbon Development requires 20% of regulated and unregulated energy needs to be provided from on-site renewable or low-carbon technologies.

***Responding to Current Planning Policy***

- 4.1.20 The applicant has demonstrated a commitment to providing sustainable development through the adoption of their internal PGL Sustainability Handbook. In addition, the Sustainability Statement provides a summary of how the development intends to respond to current planning policy.
- 4.1.21 The following table shows how the Applicant has responded to the Core Policies within their Sustainability Statement.

**Table 4.1 Summary of Response to Core Policies**

<b>Requirements of Planning Current Policy</b>	<b>Included in Sustainability Statement?</b>
South Bucks Core Policy 12: Sustainable energy	The is addressed in the Sustainability Statement: This is achieved by fulfilling the validation requirements for a Sustainability Statement, see Table 4.3.
South Bucks Core Policy 14: Environmental and Resource Management	The is addressed in the Sustainability Statement: This is achieved by fulfilling the validation requirements for a Sustainability Statement, see Table 4.3. However, air quality and noise impacts are not discussed in the Sustainability Statement as these are addressed within the ES.
Chiltern Policy CS4	See Table 4.2.
Chiltern Policy CS5	The is addressed in the Sustainability Statement: The Applicant has committed to providing 10% the development’s operational energy demand via low carbon sources.

- 4.1.22 The following table shows how the Applicant has responded to Core Policy CS4 of the Chiltern Core Strategy.

**Table 4.2 Summary of Response to Chiltern Policy CS4**

<b>Summary of Sustainability Principles of Policy CS4</b>	<b>Included in Sustainability Statement?</b>
a. Locations which are easily accessible by public transport, walking and cycling and which are provided with fast broadband services to reduce reliance on the car;	Not included in the Sustainability Statement; however, this is covered in Chapter 9 of the ES.

b. Maximum use of previously developed land, achieving higher densities in accessible locations, making the best use of existing transport infrastructure and services;	Not included in the Sustainability Statement, however, this is covered in Chapter 9 of the ES.
c. Safer access for all types of transport and pedestrians;	Refer to Sustainable Transport Strategy.
d. Minimal disruption in terms of water, noise and light pollution in the wider environment;	Proposals for limiting water consumption are included in the Sustainability Statement. Impact on noise and light pollution is not included in the Sustainability Statement; however noise is covered in Chapter 12 and the lighting strategy is included in paragraphs 4.25 to 4.27 of the ES.
e. Minimal impact on designated local Air Quality Management Areas (AQMA);	Not included in the Sustainability Statement, but covered in the Air Quality chapter of the ES.
f. Waste management and resource efficiency, being located within existing recycling service networks or providing new recycling and waste management facilities within the development;	The Sustainability Statement commits to facilitating waste management in operation and during construction. A Materials and Waste Management Strategy is required to support the reserved matters application.
g. Use of renewable energy technology sources wherever required under Policy CS5;	See Table 4.1.
h. Use of water efficiency measures during construction projects and as part of new development to reduce consumption and ensure no detrimental impact on water quality;	The Sustainability Statement provides a range of water management strategies. At detailed design the use of rainwater harvesting will be considered. During construction there is a commitment to minimising potable water use and protecting nearby water systems. Additional detail of how this is achieved should be provided at reserved matters stage.
i. Maximum re-use of construction and demolition materials and the use of locally produced building materials wherever possible;	The Sustainability Statement commits to preparing a Site Waste Management Plan. This should be submitted alongside the reserved matters application.
j. Assessment of surface water drainage impacts and the inclusion of Sustainable Drainage Systems (SUDS) which consider all SUDS options and ground conditions, under advice set out in national policy. The design and consideration of SUDS in the Critical Drainage Areas should be given particular attention so that it will not increase the risk of flooding within the site and to adjoining land/ properties;	The applicant has committed to providing a Drainage Strategy at detailed design stage, which will consider a range of SuDS methods. This should be submitted alongside the reserved matters application.
k. Reduced risk of flooding in appropriate circumstances as a result of the new development; Preservation and enhancement of nature conservation interests and important features of the natural environment such as rivers, streams, river corridors, flood plains, trees, hedgerows, ensuring there is a net gain in the District's biodiversity resources by meeting the targets in the national and local Biodiversity Action Plans as required under Policy CS24 of this Strategy	Refer to Flood Risk Assessment

l. Protection and enhancement of the historic and cultural heritage of the District including significant assets of the historic environment such as archaeological sites, historic buildings and settlements, designated landscapes, commons, ancient woodlands and hedgerows.	Not included in the Sustainability Statement. These topics were scoped out of the ES and justification is provided in Volume 2 of the ES..
m. Remediation of contaminated land, including treatment of contaminated material in line with national policy advice;	Not included in the Sustainability Statement. Ground Conditions and Contamination was scoped out of the ES and justification is provided in Volume 2 of the ES.
n. Incorporation of cycle and vehicle parking appropriate to the needs of the site;	Not included in the Sustainability Statement, however, this is provided in Chapter 4 and Chapter 9 of the ES.
o. Travel plans for any residential development of over eighty dwellings and for other development as defined by the local transport authority in its published document (including updates) "Travel Plan Guidance for Developers"	Not included in the Sustainability Statement; however is covered in Chapter 9 of the ES and Volume 2..
p. Efficient and sustainable use of soils including taking account of the presence of the best and most versatile agricultural land when siting new development. Soil function should be maintained as far as practicable through sustainable urban drainage systems, including amongst other things, the use of water-permeable treatments for hard surfaces, thus avoiding unnecessary soil compaction and paving over soil;	Not included in the Sustainability Statement.
q. The creation of safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;	Not included in the Sustainability Statement; however is included in Chapter 6 of the ES..
r. Active contribution to the national targets for reducing CO2 emissions set out in paragraph 8.3	Paragraph 8.3 refers to domestic carbon emissions and is not relevant to this non-domestic application.

4.1.23 The following table shows how the Applicant has responded to the validation requirements for a Sustainability Statement. In summary, all aspects of the Sustainability Statement are addressed in adequate detail for an outline application, with the exception of the consideration of the use of brownfield land.

**Table 4.3 Summary of Response to Validation Requirements**

Requirements of SPD	Included in Sustainability Statement?
Set out the energy efficiency of the proposed development, covering both operational energy and CO <sub>2</sub> issues, and consideration of options for renewable energy	The Sustainability Statement covers a Be Lean, Be Clean and Be Green approach to energy efficiency. It sets out considerations for renewable and low carbon technologies which are to be fully considered at detailed design stage. The connection to a heat network is considered and discounted as not feasible. The energy strategy summary considers both energy demand and carbon emissions, and there is a commitment to develop the strategy further at detailed design stage.  It is recommended that an Energy Strategy supplements the detailed planning application. The Energy Strategy should fulfil the requirements as set out in the Sustainable Construction SPD and set out how relevant planning policies from both the SPD and the Core Strategy will be fully achieved.
Set out the environmental implications of the use of the	The applicant will provide a Materials and Waste Management Strategy at detailed design stage which will measure to reduce

building materials (and use of recycled materials) proposed in the development	material use and waste. It will include a whole life carbon study to study the environmental impact of proposed materials. The applicant has not suggested early design considerations which are currently being reviewed or implemented. It is recommended that material use is considered as soon as possible to make the most meaningful impact.
Show how use of sustainable drainage systems and water efficiency will be incorporated	The applicant has committed to providing a Drainage Strategy at detailed design stage, which will consider a range of SuDS methods.  The proposed development will target the mandatory number of water consumption credits required for an 'Excellent' rating, as a minimum achieving a 25% reduction in water consumption for new buildings in accordance with the BREEAM Wat01 criteria. Outline suggestions of how this target may be achieved are provided.
Show consideration for brownfield sites	The applicant has made no consideration of brownfield sites in the Sustainability Statement.
Show consideration for water manage, promoting resource efficiency	The Sustainability Statement provides a range of water management strategies. At detailed design the use of rainwater harvesting will be considered.
Show how features of the site (eg topography and orientation) have informed sustainable design principles	At the Be Lean stage of the energy hierarchy passive design features should be incorporated. Although there is a strong focus on a fabric-first approach the applicant has not discussed how site features have been used to reduce energy demand.  The applicant has committed to providing an overheating assessment at detailed design stage. It is recommended that this is undertaken to CIBSE TM52 as a minimum and includes climate change scenarios. The proposals include using the cooling hierarchy and promoting the use of passive design to reduce active cooling measures.  It is expected that the applicant will use site features to maximise passive design measures.
Show the predicted energy demand of the proposed development and the degree to which the development meets current energy standards	The applicant has set out estimated energy demand and carbon emissions. Although it appears to achieve a 10% reduction in both energy demand and carbon emissions through the use of low carbon or renewable technologies this is not made clear in Table 4.2, providing absolute values only. Should the estimated energy demand change the low carbon reduction should also increase to continue delivering 10% of the development's estimated energy demand, as committed to elsewhere in the Sustainability Statement. The 10% energy requirement target should be a planning condition.
Where appropriate, include a Building Research Establishment Environmental Assessment Method (BREEAM) rating.	There is no policy requirement to achieve a BREEAM rating but the applicant is committing to achieving BREEAM Very Good.

- 4.1.24 At reserved matters further detail shall be required to demonstrate how the proposed development achieves the relevant local planning policies.
- 4.1.25 The applicant has committed to providing 100% of the electricity to the site using Renewable Energy Guarantees of Origin (REGO) tariffs. Although the electricity purchased is from renewable energy it is not considered to meet the planning policy target of at least 10% of energy requirements to be from renewable or low carbon technologies as the technologies are not provided as part of the proposed development. However, the

REGO tariffs are a welcome additional measure to further reduce the proposed development’s impact on the environment.

**Commentary on the Conclusions of the Assessment**

4.1.26 As this is an outline application it is felt that the Sustainability Statement provides sufficient detail to demonstrate a commitment to meeting relevant planning policy at reserved matters stage. However, further detail will be required to support a reserved matters application.

4.1.27 Clarifications are provided below and additional recommendations are made in **Table 5.1**.

Summary of Clarifications Required
30. Clarify whether the Sustainable Construction SPD or the Chiltern Core Strategy have been considered in the development of the Sustainability Statement.
31. The consideration of the use of brownfield land has not been reviewed in the Sustainability Statement.
32. Air quality and noise impacts are not discussed in the Sustainability Statement. Confirm that these are addressed in other supporting documents to the application.
33. Transport impacts are not reviewed in this report and should be reviewed alongside CS4.
34. It is expected that the applicant will use site features to maximise passive design measures. This should be explicitly detailed.

**4.2 Landscape Strategy Review**

**Landscape Design Approach**

4.2.1 The landscape design approach set out in paragraph 1.0.2 should include landscape and visual integration as a key driver. **This is included as a clarification in the table below.**

**Existing Landscape**

4.2.2 Figure 1.1 should identify existing Public Rights of Way. **This is included as a clarification in the table below.**

**Landscape Strategy**

4.2.3 Section 1.2: Landscape Strategy refers to the Colne Valley Regional Park Action Plan. It should also refer to the objectives and opportunities identified in the Colne and Crane Green Infrastructure Strategy. **This is included as a clarification in the table below.**

4.2.4 The vision, strategy and landscape guidelines for the character areas in the published landscape character assessments (Iver Heath Mixed Use Terrace LCA and Iver Heath Terrace LCA) should also be identified, as appropriate.

4.2.5 Figure 1.3: Landscape Strategy Plan – more information should be provided on the constraints associated with the underground pipeline. **This is included as a clarification in the summary table below.**

4.2.6 Paragraph 1.2.3 identifies the key aims and objectives of the landscape strategy. The three key strands that are proposed to help deliver the strategy and to reflect the Colne Valley Regional Park Action Plan are identified in paragraph 1.2.4.

## **Illustrative Masterplans**

- 4.2.7 The Illustrative Masterplans (Options 1 and 2) have been designed to help deliver the strategy but the Key Strand No. 1: 'An Enhanced Woodland Framework' has not been fully accommodated as woodland is quite limited in provision. Most of what is identified as woodland on the Illustrative Masterplans may be more properly regarded as lines of trees or narrow tree belts (typically only 10m wide). The northern and southern tree belts (Pages 9 and 12) would be dissected by roads. The northern tree belt is sandwiched between buildings, which will constrain tree growth in terms of shading and space for growth of large-scale trees.
- 4.2.8 The objectives for the new east-west green corridor across the centre of the site will be of limited effectiveness due to the narrow width of its western section and dissection of the corridor by a connecting road (Figure 1.18).
- 4.2.9 It would be more appropriate for the new alignment of the permissive footpath to be located within either the central or northern east-west green corridors so a connection may be made directly to the Black Park bridleway, rather than the footpath terminating at the site boundary. The proposed alignment of the permissive footpath through a car park would be relatively unattractive for those people who value walking through countryside.
- 4.2.10 The trees proposed on the 10m wide earth bund in the Black Park Green Link (Figure 1.11) are shown as having 2-3m wide canopies (Figure 1.31 and Figure 1.32) and would be small in scale. As such they would not be effective in enclosing views of the proposed 21.5m high buildings. The stated objective of screening views from the Public Right of Way within Black Park (paragraph 1.4.6) will be fulfilled to only a very limited degree).
- 4.2.11 There is sufficient space, subject to SUDS requirements, within the Pinewood Road Green Link to incorporate the 10m (minimum) belt of new tree/shrub planting. This would filter views of the proposed car parks and built form from Pinewood Road as intended, particularly during the winter months. The degree of hedgerow loss associated with the three proposed vehicular access points off Pinewood Road needs clarification. **This is included as a clarification in the table below.**
- 4.2.12 The landscape proposals for the Arrivals Area, Visitor Attraction Area, Car Parking Areas, and Green/Blue Infrastructure are all considered appropriate.

<b>Summary of Clarifications Required</b>
35. The Applicant should clarify whether the landscape design approach includes landscape and visual integration as a key driver.
36. Clarify whether Figure 1.1 includes Public Right of Way.
37. The Landscape Strategy should also refer to the objectives and opportunities identified in the Colne and Crane Green Infrastructure Strategy.
38. The Applicant should clarify the constraints associated with the underground pipeline.
39. The degree of hedgerow loss associated with the three proposed vehicular access points off Pinewood Road needs clarification.

## 5.0 SUMMARY OF MITIGATION MEASURES

- 5.1.1 The table below provides a comprehensive summary of all mitigation measures proposed by the Applicant across the topics that the Temple Team have been commissioned to review, both embedded and additional.
- 5.1.2 Buckinghamshire Council should ensure they secure the delivery of these mitigation measures by means of an appropriate approval, obligation, agreement and or condition.

**Table 5.1 Summary of Mitigation Measures**

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
LVIA	Pre-Construction	None	None
	Construction	<p>Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS5837:2005 Trees in relation to construction).</p> <p>Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS5837:2005 Trees in relation to construction).</p> <p>Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009);</p> <p>Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.</p>	None
	Operation	<p>Keeping building heights lower in proximity to visual receptors (residential receptors);</p> <p>Retaining all high and medium value trees with appropriate</p>	Consideration of the opportunity at Reserved Matters stage for creation/enhancement of an east-west pedestrian/cyclelink (as highlighted in the Colne and Crane Green Infrastructure Strategy)

		<p>root protection buffers where possible, as identified by the Arboricultural Impact Assessment (see Appendix 7.2);</p> <p>Where vegetation losses are unavoidable (e.g. at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;</p> <p>Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;</p> <p>Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points;</p> <p>Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;</p> <p>Within the green infrastructure buffer, and adjacent to Black Park where the PRoW is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;</p> <p>Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/year);</p> <p>Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties.</p>	<p>east-west across the site, ideally linking with existing public footpaths along the eastern edge of Pinewood Road.</p> <p>Preparation of detailed landscape proposals at Reserved Matters stage to provide a robust framework of vegetation for landscape and visual integration purposes.</p> <p>Careful consideration at Reserved Matters stage of the colours and textures of building materials.</p> <p>Careful consideration at Reserved Matters stage of the treatments of signage, security fencing, lighting columns and other free-standing features along the site periphery.</p>
<b>Climate Change</b>	Pre-Construction	None	None



	Construction	Site Waste Management Plan and Construction Environmental Management Plan	None
	Operation	"Fabric first" approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2013; 100% low energy (LED) lighting; High efficiency gas boilers or low carbon heat pumps where heating is required; 10% of the site's energy delivered through low carbon renewable energy.	None
<b>Air Quality</b>	Pre-Construction	None	None
	Construction	None	Dust mitigation to be included in a Construction Environmental Management Plan (CEMP).
	Operation	None	None

**Additional Recommended Measures**

**Compliance Review**  
 The Applicant should provide worst-case scenario parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.

Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.

**Landscape and Visual Impact Assessment**  
 A Landscape and Ecological Management Plan should be prepared at the Reserved Matters stage.

**Climate Change**  
 Provide details of how mitigation measures can be further developed at later design stages, and monitored during construction and operation.

**Air Quality**  
 It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.

It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.

**Sustainability Statement**  
 A planning condition should be raised to ensure the development provides 10% of its energy requirements from renewable or low carbon sources.

A Materials and Waste Management Strategy is required to support the reserved matters application. It is recommended that the material use proposals within the whole life carbon assessment is considered as soon as possible to make the most meaningful impact.

A construction stage water management strategy is required to support the reserved matters application.

A Site Waste Management Plan is required to support the reserved matters application.A

Drainage Strategy is required to support the reserved matters application.

An Energy Strategy is required to support the reserved matters application.

An Overheating Report is recommended to support the reserved matters application.

## Appendix B Final Review Report 001



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**Report for** – Buckinghamshire Council  
Screen Industries Global Growth Hub Partial ES, Compliance and Standalone  
Document Review  
Final Review Report 001Final

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**Document version control**

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Version	Date	Author	Reviewed by	Reviewed and approved by
1.0	20/01/2020	Various	Jessica Parnwell	Spencer McGawley

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**Report for:** **Buckinghamshire Council**

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**Main contributors:** **Various**

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## **Contents**

1.0	Introduction to the ES Addendum Review	1
2.0	Review of Submitted Potential Regulation 25 Requests	2
3.0	Summary of Mitigation Measures	19

## **Appendices**

Appendix A	– Interim Review Report	24
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## 1.0 Introduction to the ES Addendum Review

- 1.1.1 The Temple Team carried out an independent review of Chapters 7, 10 and 11 of the Environmental Statement (ES) submitted in support of the planning application for Screen Industries Global Growth Hub (Application Reference: PL/20/3280/OA). The output of the review was an Interim Review Report (IRR) (**Appendix A**) submitted to Pinewood Group Limited (PGL), 'the Applicant' by Buckinghamshire Council.
- 1.1.2 In response to the IRR Turley, on behalf of the Applicant, submitted the 'Response to Temple Comment' document dated 11<sup>th</sup> December 2020.
- 1.1.3 A review of the specific responses to the individual IRR and potential Regulation 25 requests is presented within **Chapter 2** of this FRR.

## **2.0 Review of Submitted Potential Regulation 25 Requests**

- 2.1.1 **Table 2.1** below provides a review of the response document submission in response to the request for potential 'further information' (under Regulation 25) in the November 2020 IRR.
- 2.1.2 Each potential 'further information' (under Regulation 25) request has been dealt with individually in **Table 2.1** and the Temple Team have stated whether the Applicant's response is deemed to be acceptable to close out the issue, or whether further clarification or information is required. If there are outstanding issues following the reassessment, a further round of review may be required.



**Table 2.1 Assessment of Response to IRR within the 'Response to Temple Comment' document dated 11<sup>th</sup> December 2020.**

Chapter IRR Ref No.	Request Type	Comment / Request IRR	Review Commentary	Review Conclusion Responses considered to be <b>Acceptable (Green)</b> or <b>Unacceptable (Red)</b>
Chapter 7: Landscape and Visual Ref: 1	Clarification	Justify the magnitude of change at Year 0 in terms of the large-scale of the proposed buildings and the value of the existing fields.	The open fields of the site are described in LVIA Para. 7.58 as “ <i>devoid of diversity or visual interest</i> ”. However, the “ <i>undeveloped spaces/fields between areas of development</i> ” are identified in the Colne Valley Landscape Character Assessment (Iver Heath Terrace LCA) as being sensitive to change. The medium magnitude of change identified in the LVIA is considered appropriate, but the loss of openness should have been identified as a contributory factor in the assessment, though no further action is required.	<b>Acceptable</b> No further clarification is required.
Chapter 7: Landscape and Visual Ref: 2	Clarification	Identification of visual effects based on 'winter' views.	The worst-case winter views are relevant to all viewpoints assessments. There is only one reference to winter months/views visibility in the text (Para. 7.83). The difference in effect between winter and summer views should have been described in the LVIA, however, as the Applicant has confirmed that the magnitudes of change are applicable for the maximum case, no further action is required.	<b>Acceptable</b> No further clarification is required.
Chapter 7: Landscape and Visual Ref: 3	Clarification	Identification of hedgerow loss along Pinewood Road resulting from proposed junctions and vehicular sightlines.	The Applicant's response refers to three potential access locations as shown on the parameter plan (Figure 4.7) and has assumed that each access would result in the loss of no more than 20 m of hedgerow. This hedgerow loss for these three access locations (and an unknown number of additional service access points identified on the Figure 4.7 notes) should have been identified in the 'Assumptions' section at Para. 7.146. The visual assessment section at Paras. 7.116 to 7.117 refers to how car- parking/buildings would be seen through the new entrances, but reference should have been made to this wider loss of hedgerow and the resultant greater visibility of buildings. However, as the Applicant has identified the hedgerow loss, no further action is required.	<b>Acceptable</b> No further clarification is required.

Chapter 7: Landscape and Visual  Ref: 4	Clarification	Amendments to photomontages to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	The green infrastructure parameter plan (Figure 4.6) identifies the location of a peripheral belt of multi-functional green infrastructure (GI), including new/enhanced landscape and ecology and a strengthened landscape frontage to Pinewood Road. It does not specify the quantum or extent of tree/shrub planting within this GI corridor and does not commit to provision of the woodland belts that have been modelled. The assessment should not rely on the establishment of woodland belts, which may or may not be found to be feasible at reserved matters stage. It is accepted that the photomontages cannot accurately identify the potential access locations but a note in the photomontage footer to flag up the requirement for these access points would have helped avoid any misunderstanding by the general public that the hedgerow would be left intact.	<b>Unacceptable</b>  The Applicant should identify which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned.
Chapter 7: Landscape and Visual  Ref: 5	Clarification	Revisions to the landscape and visual impact assessment to (1) accurately reflect the relatively limited amount of tree/shrub mitigation planting that is proposed on the GI Parameter Plan; and (2) Identify the proposed junctions and hedgerow loss along Pinewood Road.	As noted in the Ref: 4 response above, the green infrastructure parameter (Figure 4.6) does not commit to the provision of woodland belts and hence there is no basis to assume a continuous 10-13m high woodland buffer in the Year 15 assessment. As per the response to IRR Ref 4, it would be useful if the Applicant could identify during the which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned. It is accepted that the Chapter 7 LVIA judgements include the assumption that accesses will be required. The reviewer is satisfied that the large magnitude of change identified for views from Pinewood Road at Year 0 would 'accommodate' the 20m length of hedgerow loss associated with each of the proposed junctions off Pinewood Road.	<b>Unacceptable</b>  The Applicant should identify which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned.
Chapter 7: Landscape and Visual  Ref: 6	Potential Regulation 25	Assess the likely effects based on the future baseline, with reference to the restoration plan for the minerals working site.	The Applicant states that the baseline has assumed the site is an area recently worked for minerals and is in the process with being restored which is consistent with the rest of the EIA. Consistency with the rest of the EIA is noted but it would have been helpful to have an additional assessment based on future baseline conditions (i.e., with the mineral workings fully restored/no longer a degraded landscape). However, no further action is required as the reviewer is satisfied that this will not alter the magnitude of visual change or significance of effect.	<b>Acceptable</b>  This is acceptable and is not considered further information under the EIA Regulations.

Chapter 7: Landscape and Visual  Ref: 7	Potential Regulation 25	Preparation of a local landscape character area to better inform identification of landscape effects.	The Applicant has provided a list of the key characteristic and sensitivities in the response document. The list is noted. Preparation of a local landscape character assessment is good practice and would have been helpful for the LVIA, however, as the Applicant has now provided this list, no further action is required.	<b>Acceptable</b>  This is acceptable and is not considered further information under the EIA Regulations.
Chapter 7: Landscape and Visual  Ref: 8	Potential Regulation 25	Provide justification as to the level of the effect in Year 15 with specific reference to the effectiveness of the woodland buffer in winter.	The Applicant has stated that the LVIA judgements take into account the fact that views of buildings will not be completely screened from the section of bridleway closest to the Site. The illustrative masterplan (DAS Figure 6.10) indicates a line of intermittent trees passing along the centre of this GI corridor/parallel to the western site boundary. This small number of trees will provide some intermittent filtering of views during the winter months at Year 15.	<b>Unacceptable</b>  The Applicant should commit to providing a sufficiently wide woodland belt parallel to the western site boundary to ensure that there is a reduced level of visual effect in the winter of Year 15.
Chapter 7: Landscape and Visual  Ref: 9	Potential Regulation 25	The level of significant residual effect at Year 15 and its nature should be identified. An explanation of why the level of significant effect falls from Year 0 to Year 15 should also be provided.	The Applicant has stated that the reduction in effects is largely a consequence of the maturing vegetation; however, as previously stated, it is not clear whether woodland planting is proposed.	<b>Unacceptable</b>  The Applicant should identify which parts of the peripheral GI corridor would be suitable for woodland planting so that this can be conditioned and to ensure effects are reduced.
Chapter 10: Climate Change  Ref: 10	Clarification	Clarify if there are any other local policies relevant to climate change.	The Applicant confirms that there are other Policies, however this was not intended as an exhaustive list and the aim was to provide a short review of relevant climate change related Policies to provide an element of context insofar as they have informed the assessment.  This is acceptable, although it is important to understand the relevant local policy requirements as this can have a bearing on the acceptability of particular impacts.	<b>Acceptable</b>  No further clarification is required.
Chapter 10: Climate Change  Ref: 11	Clarification	Have the operational energy figures been obtained from benchmarked data from other schemes or from the scheme's Energy Strategy?	The Applicant confirms that benchmark figures used in the preparation of the Sustainability Statement and the chapter are the same, but the chapter utilises long term emissions factors to provide a more accurate long-term view of the development's emissions. It is agreed that the use of long-term emissions factors is considered appropriate.	<b>Acceptable</b>  No further clarification is required.

Chapter 10: Climate Change  Ref: 12	Clarification	Clarify the proposed operational design life for the scheme and clarify whether the assessment is of 28 or 30 years.	The assessment has been carried out over the period from 2022 – 2050, the noted cumulative 30-year period is therefore incorrect, and it is 28 years. The assessment period of 2022- 2050 has been used to reflect the UKs zero carbon target. This does not have a bearing on the conclusions of the assessment.	<b>Acceptable</b> No further clarification is required.
Chapter 10: Climate Change  Ref: 13	Clarification	Clarify what data the process emissions are based on.	The Applicant confirms that Process Emissions are “ <i>the use of fuel or purchased electricity in a process (e.g., the manufacture of materials used in construction)</i> ”, taken from the RICS factors on embodied carbon.	<b>Acceptable</b> No further clarification is required.
Chapter 10: Climate Change  Ref: 14	Clarification	Provide more details as to how carbon will be reduced and monitored in later design and construction stages.	The Applicant confirms that during the design phase an assessment will be carried out of the embodied carbon of new buildings to identified potential materials and measures to reduce the embodied carbon of the Proposed Scheme (para 10.51), which is expected to be required by a suitable Planning Condition.	<b>Acceptable</b> No further clarification is required, subject to the inclusion of the planning condition.
Chapter 10: Climate Change  Ref: 15	Potential Regulation 25	Provide a more systematic assessment of climate change adaptation and resilience impacts, in alignment with the June 2020 IEMA Guidance.	The Applicant states that IEMA Climate Change Resilience and Adaptation guidance is referenced and was used in the preparation of the ES chapter. Having discussed with the Applicant, it is agreed that the assessment should be proportionate to the risks from climate change, and consideration has been appropriately given to how climate change may potentially impact cumulatively with effects in other chapters as part of the design stage discussions. The cross-cutting mitigation set out in the chapter provides evidence of measures incorporated into the design of the Proposed Scheme to demonstrate its resilience. Although the Reviewer is comfortable that the key climate resilience and in-combination risks have been considered within the design, for future reference it would have been helpful to clearly set out all of the steps taken from the guidance, including how future climate risks would be monitored and managed. No further action is required.	<b>Acceptable</b> This is acceptable and is not considered further information under the EIA Regulations.
Chapter 10: Climate Change  Ref: 16	Potential Regulation 25	Provide an estimate of GHG emissions associated with the transportation of c. 2 million visitors and associated servicing of the	Excluding operational activities such as mains water consumption, wastewater treatment, and the transport and treatment of waste is considered acceptable, as stated in the initial review. With regards to the emissions associated with transport, the Applicant states that this “ <i>cannot be carried out accurately as</i>	<b>Unacceptable</b> The nature of the scheme is such that the visitors are likely to make specific trips and thus cause net

		<p>scheme, and update overall residual effects accordingly.</p>	<p><i>there is no way of determining which of the potential c.2 million trips are new, i.e., they are additional to those already on the network</i>", and points to Paragraph 10.90 of the chapter relating to increased use of electric vehicles and other low carbon initiatives for freight transport.</p> <p>Whilst the IEMA GHG assessment guidance acknowledges that qualitative assessments are acceptable where data is unavailable, it is considered that reasonable assumptions could be readily applied to give a reasonable worst-case assessment. The nature of the Proposed Scheme is such, that it is likely that trips are made specifically to visit it and a sensible trip origin and vehicle type could be applied in the absence of anything more detailed from the Transport Assessment (which would be surprising if this is not available).</p> <p>Not being able to accurately estimate emissions is not the same as not including a very broad assessment with clearly stated assumptions. Therefore, it is considered that, notwithstanding the above points, a critical source of GHG emissions has been excluded from the magnitude set out in Tables 10.13-10.15 and the assessment is not acceptable.</p>	<p>additional trips. Broad assumptions can be made to provide a reasonable worst-case assessment.</p>
<p>Chapter 10: Climate Change  Ref: 17</p>	<p>Potential Regulation 25</p>	<p>The residual construction phase effect is greater than the threshold for medium magnitude impact at the SBDC scale, which is inconsistent with the low category stated and avoids stating a significant effect.</p>	<p>The Applicant reiterates that Paragraph 10.33 states there are no published criteria to determine impact magnitude, and it is agreed that the IEMA Guidance also supports the use of professional judgement.</p> <p>However, the thresholds provided must be for a reason to allow transparency of the assessment, so that the reader has a point of reference to understand the determination of the results.</p> <p>It is recognised that the benchmarked RICS factors used in the embodied carbon assessment are often demonstrated by LCA to be overstated and therefore this is considered as suitable justification as to why being only 0.07% (not 0.7% as the Applicant states in their response) beyond the threshold in this case can apply a lower magnitude.</p> <p>That said, the combined emissions in Table 10.16, whilst excluding a reasonable worst-case inclusion of operational traffic, still comes to 3.31%, and in conjunction with the comments in Ref:16, is likely to be an even higher percentage above the threshold and therefore avoids stating a significant effect. This is accounted</p>	<p><b>Acceptable</b>  This is acceptable and is not considered further information under the EIA Regulations.</p>

			for under the Reviewer's response to Ref: 16, and the acceptability of this response only relates to the construction phase.	
Chapter 10: Climate Change  Ref: 18	Potential Regulation 25	State the significance of the cumulative effects.	The Applicant notes that GHG emissions are inherently cumulative as they contribute to a global impact and the assessment of cumulative schemes would require a GHG assessment for each cumulative scheme which is not considered proportionate or practical, and the Applicant has no control over emissions outside of the Proposed Scheme. This is considered acceptable.	<b>Acceptable</b>  This is acceptable and is not considered further information under the EIA Regulations.
Chapter 10: Climate Change  Ref: 19	Potential Regulation 25	The Applicant should further justify why operational mitigation measures are not proposed.	The Applicant states that as there is no significant effect concluded from operational emissions, no further measures are proposed to ameliorate a significant effect. Although in response to Ref: 16, operational traffic is inappropriately excluded from the emissions inventory, and may trigger a significant effect, this Potential Regulation 25 point relates to non-transport operational mitigation.  It is clarified that additional detail on operational carbon reduction measures will be considered as part of future Reserved Matters Applications, and these are included in the Sustainability Statement which accompanies the Application. This is considered acceptable.	<b>Acceptable</b>  This is acceptable and is not considered further information under the EIA Regulations.
Chapter 10: Climate Change  Ref: 20	Potential Regulation 25	Update the NTS to reflect the comments and include all significant effects and a description of climate change adaptation/resilience.	The Applicant states that the NTS already concludes that effects would not be significant, taken from the assessment conclusion. In light of their responses, it is not considered the NTS required updating.  The Reviewer is still concerned about the exclusion of a reasonable worst-case assessment of operational traffic, as set out in the review of Ref: 16. Inclusion of emissions from c. 2 million net additional annual trips from wherever they might arise is expected to lead to an increase in the overall emissions well above the 3% magnitude threshold identified in the assessment, and therefore trigger a significant effect which should be identified in the NTS.	<b>Unacceptable</b>  The inclusion of a reasonable emissions from operational traffic is likely to exceed the thresholds for a significant effect.
Chapter 11: Air Quality  Ref: 21	Clarification	There is no reference to the National Planning Policy Framework and Planning Practice	The Applicant has advised that although the NPPF and PPG were not referenced within the Chapter they were followed, and their omission would not alter the conclusions of the assessment.	<b>Acceptable</b>  No further clarification is required.

		Guidance which should both be included within the Chapter.		
Chapter 11: Air Quality Ref: 22	Clarification	Clarify whether consultation on the scope and methodology of the assessment was undertaken and if it was this information should be included within the Chapter.	The Applicant has clarified that consultation was not undertaken and therefore no updates are required.	<b>Acceptable</b> No further clarification is required.
Chapter 11: Air Quality Ref: 23	Clarification	Paragraph 11.10 states that the <i>'effects of dust and particulate matter emissions on nearby residential receptors are unlikely to be considered significant and will not be considered within the ES'</i> and then states that a construction dust assessment is included in Appendix 11.2. The effects of construction dust have therefore been considered within the ES and Paragraph 11.10 should be amended accordingly to avoid confusion.	The Applicant acknowledges that this could be worded better however the conclusions of the construction dust assessment would remain the same. Whilst this approach may confuse the readers, the outcome of the assessment remains the same.	<b>Acceptable</b> No further clarification is required.
Chapter 11: Air Quality Ref: 24	Clarification	An explanation should be provided within the assessment as to why Slough has been assessed and clarification is required as to whether roads between the two study areas are affected (i.e., meet the EPUK/IAQM screening criteria). If these roads are affected and there is relevant public exposure, then they should be included within the assessment.	Clarification has been provided that roads between the two study areas were not assessed as they are not affected by the Proposed Development i.e., traffic generated by the Development does not meet the EPUK/IAQM screening criteria requiring a detailed assessment.  Updates to the assessment text to include this clarification are not proposed.	<b>Acceptable</b> This information should have been provided within the assessment however no further clarification is required.
Chapter 11: Air Quality Ref: 25	Clarification	The Applicant should include PM10 monitored concentrations within the baseline assessment.	PM10 concentrations have been included in the baseline assessment for Slough, however PM10 and PM2.5 are not monitored in South Bucks.	<b>Acceptable</b> No further clarification is required.



Chapter 11: Air Quality Ref: 26	Clarification	Clarification is required as to whether PM2.5 is monitored by Slough Borough Council. The Applicant should include PM2.5 monitored concentrations within the baseline assessment if data are available.	Clarification has been provided that PM2.5 monitoring is not undertaken South Bucks. It is monitored in Slough but data from these sites has not been included as the monitoring sites were not deemed to be representative of the Development Site. PM2.5 concentrations are low at all three monitoring sites. Inclusion of data would not alter the conclusions of the baseline section.	<b>Acceptable</b> This information should have been provided within the assessment however no further clarification is required.
Chapter 11: Air Quality Ref: 27	Clarification	Clarification is required as to whether the building onsite adjacent to Pinewood Road will be demolished as demolition activities are not included in the dust risk assessment. If demolition activities are planned the dust risk assessment will need to be revised.	Clarification has been provided that no demolition activities will occur onsite therefore no updates are required.	<b>Acceptable</b> No further clarification is required.
Chapter 11: Air Quality Ref: 28	Clarification	Figure A11.1 needs to be updated to show distance bands to Pleasant Cottage Guest House, Pinewood Manor & Goosebarry Hill residential dwellings and Sino Ornata, Wookey, Fairlawn and Villandry residential dwellings.	The Applicant has advised that distance bands were generated from the boundary of the Site which provides a worst-case assessment and therefore no updates are required.  Drawing distance bands from the site boundary for construction dust assessments is acceptable however the distance bands in Figure A11.1 have not been drawn correctly around the southern end of the site and need to be updated.	<b>Unacceptable</b> Figure A11.1 needs to be updated so that distance bands around the southern end of the site are correct.
Chapter 11: Air Quality Ref: 29	Clarification	Clarification is required within the assessment as to which roads experience a decrease in traffic flows during the construction phase and why.	Clarification is provided that the Sevenhills roundabout development leads to the reduction in flow for a small number of links as traffic is rerouted to/from the Site. The decrease occurs on: <ul style="list-style-type: none"> <li>• Small section of Pinewood Road between Pinewood West and Pinewood Green.</li> <li>• Pinewood Green</li> <li>• Church road</li> <li>• Denham road</li> </ul>	<b>Acceptable</b> This information should have been provided within the assessment however no further clarification is required.
Chapter 11: Air Quality	Clarification	Full results from the 'Further Assessment' Do Minimum +SHR scenario outlined in paragraph	Results have been provided in 'Appendix 1' of the Applicant's response document.	<b>Acceptable</b> This information should have been provided within the assessment however no



Ref: 30		11.100 are not provided and should be included within Appendix 11.		further clarification is required.
Chapter 11: Air Quality Ref: 31	Clarification	Paragraph 11.120 should be amended to remove 'magnitude of change' which is not relevant to the assessment.	The Applicant has advised that ' <i>this change of wording would not alter the conclusions of the assessment as such this change is note required</i> '	<b>Acceptable</b> No further clarification is required.
Chapter 11: Air Quality Ref: 32	Clarification	Residual effects are discussed in paragraphs 11.88 to 11.90, however as no mitigation is proposed this text should be amended to avoid confusion and readers should be referred to the conclusions in paragraph 11.85.	The Applicant has advised that ' <i>This follows the requirements of ES assessment, and would not alter the conclusion of the assessment, as such this change is not required</i> '.	<b>Acceptable</b> Although paragraphs 11.88 and 11.90 may cause confusion the outcome of the assessment is not affected, and no further clarification is required.
Chapter 11: Air Quality Ref: 33	Clarification	The proposed construction dust mitigation measures outlined in Appendix 11.2 are adequate, however they need to be crossed referenced in the 'Secondary Mitigation or Enhancement' section of Chapter 11.	The Applicant has advised that ' <i>This change of wording would not alter the conclusions of the assessment as such this change is not required.</i> '	<b>Acceptable</b> Paragraph 11.65 states that construction dust mitigation measures outlined in Table 11.11 in Appendix 11.2 are tertiary mitigation measures.
Chapter 11: Air Quality Ref: 34	Clarification	The NTS should include result of the construction dust assessment.	The Applicant has advised that construction dust mitigation measures which are an integral part of the Proposed Scheme would ensure that there is no significant effect from construction dust and therefore it was not assessed within the ES and this change is not required to the ES chapter or NTS.	<b>Acceptable</b> It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.
Chapter 11: Air Quality Ref: 35	Potential Regulation 25	The dispersion model should be updated to include all roads likely to affect pollutant concentrations within 200 m of sensitive receptors. The model should be rerun, and pollutant concentrations reassessed.	The Applicant has advised that ' <i>air quality modelling was constrained by data availability and COVID-19 resulting in no further traffic surveys from those completed in 2019, as detailed in the chapters limitation. The receptors were placed as far as possible from the missing links to ensure that the effects were limited as it is understood that concentrations decrease with distance from road source. This could lead to a slight reduction in</i>	<b>Acceptable</b> This information should have been provided within the assessment. This is acceptable and is not considered further

			<p><i>the possible total concentrations, however by using worst case backgrounds from 2020 with no future improve it is considered that the assessment is reliable, and the conclusion could remain as determined by the assessment.'</i></p> <p>Further information was provided on how missing road links may affect predicted concentrations at specific receptor locations (around Pinewood, Wellington Street Roundabout, William Street Junction, Farnham Road Junction and Church Street Junction) with reference to receptor distance from the missing link/s, the Defra NO<sub>2</sub> fall off with distance calculator and IAQM/EPUK guidance. It was found that impacts predicted in the ES at some receptor locations (E42, E46, E47, E48 and E50) are slightly under worst case however this would not alter the conclusion of the chapter.</p>	information under the EIA Regulations.
Chapter 11: Air Quality Ref: 36	Potential Regulation 25	The Applicant should redo model verification for the Slough study area to only include monitoring sites where all roads likely to affect pollutant concentrations within 200m of the site are modelled, and to exclude kerbside monitoring sites (unless kerbside sites are relevant for exposure).	Clarification was provided that three diffusion tubes were included in the verification that are classified as kerbside, however distances between the kerbside and the monitoring sites were provided which indicate that they are representative of roadside rather than kerbside locations (they are all > 1 m from the road). Therefore, updates to the assessment are not required.	<b>Acceptable</b> This is acceptable and is not considered further information under the EIA Regulations.
Chapter 11: Air Quality Ref: 37	Potential Regulation 25	The Applicant should review all sensitive receptors modelled to ensure that they are representative of worst-case public exposure and model pollutant concentrations at additional receptors if worst case exposure has not been assessed.	The Applicant reviewed all modelled sensitive receptors and confirmed that in Pinewood worst case sensitive receptors were considered. In Slough, the model is limited by traffic data availability as detailed in response to Ref 35. However, the headroom in concentrations predicted at those receptors already included in the model suggests that the conclusions of the assessment would remain the same. As such it is not considered that further receptors need to be included.	<b>Acceptable</b> This is acceptable and is not considered further information under the EIA Regulations.
Chapter 11: Air Quality	Potential Regulation 25	The Applicant should review all junctions and roundabouts modelled to ensure that all road links (and slip roads) at	The Applicant cross referenced the response to Ref 35.	<b>Acceptable</b> This is acceptable and is not considered further

Ref: 38		roundabouts and junctions are included in the model and that roundabout and junction layouts within the model are correct. The model should be rerun, and pollutant concentrations reassessed.		information under the EIA Regulations.
ES Compliance Ref: 39	Clarification (Concerns)	Figure 4.10 (PP7 Development numbers and yield) specifies area of the site as 32.6ha and specifies maximum area covered by parameter elements. However, there is no figure by hectare provided for Education and Business Hubs. It is unclear if this is within the parameters of the production studio or additional, as the land uses do not sum to the figures of 32.6ha. Clarification is required as to the area (hectares) of the Education and Business Hubs in addition to floorspace stated	The Applicant confirms that the education and business hubs are not defined by size in hectares as this is dependent upon 'other design considerations such as the number of floors. It is accepted by this FRR that the maximum parameters for education and business floorspace as a whole are identified (both qualitatively and on supporting illustrations the location of where the 2 options for land use sits within the site) and whilst further information beyond the 'jelly mould' parameter would be helpful the basis for the assessments are nonetheless sound.  The concerns regarding sum of area are explained by rounding of decimal places with further explanation provided with regard to area of 'secondary green infrastructure' not included within the PP4 Green Infrastructure or building zone figures. As the assessment has considered the worst-case parameter without these secondary green infrastructure the assessment is sound.	<b>Acceptable</b> No further clarification is required.
ES Compliance Ref: 40	Clarification (Concerns)	Green Infrastructure parameter s stated as "no less than 9.8ha" (Table 4.1). However, Figure 4.10 specifies Green Infrastructure as 10.3ha. Further information is required to confirm correct parameters for green infrastructure.	The Applicant confirms that the lower figure is the basis for minimum parameters for the assessment of biodiversity net gain, whilst the higher figure represents the intended total figure for green infrastructure including splays at point of access. This FRR concurs that the use of the lower figure within the assessments for BNG represents a worst-case scenario.	<b>Acceptable</b> No further clarification is required.
ES Compliance Ref: 41	Clarification (Concerns)	In addition, Biodiversity Net Gain of "at least 10%" is specified. It should be noted that in terms of Biodiversity Net Gain it is more complex than simple area coverage of green infrastructure, with connectivity, nature, and quality of habitat of primary	The Applicant confirms agreement with this statement and reiterates this is acknowledged within the ES.	<b>Acceptable</b> No further clarification is required.

		importance to achieving percentage.		
ES Compliance Ref: 42	Clarification (Concerns)	Whilst the notes in Figure 4.10 specify Black Park Buffer and Amenity Buffer 'up to 30m wide' no minimum parameter width is stated in the parameter table. Reference is made within paragraph 4.20 to a 25m buffer and " <i>along points of access, the green infrastructure boundary will be narrowed</i> " The parameter plans should make clear the minimum buffer width as well as the maximum to highlight the range.	The IRR response confirms that any reduction to the buffer width below 25m would be limited to accommodate visibility at access point splays. This FRR concurs that parameter plans specify 25m and 30m buffers.	<b>Acceptable</b> No further clarification is required.
ES Compliance Ref: 43	Clarification (Concerns)	Reference is made to minimum and maximum numbers of buildings within the visitor attraction and education and business hubs; however, no figure is provided for the production studios. Clarification is required as to whether minimum/maximum number of buildings are fixed as a parameter as not specified on plans/figures submitted.	The IRR response confirms that no figure is provided for production studio building number, and that as a reserved matter will be determined in agreement with the LPA at reserved matters stage. This FRR agrees that the outline maximum parameters in terms of building height and massing have been assessed by the 'jelly mould', presenting a worst case. The provision of Appendix 2 to present the DAS illustrative layout is useful and no further information is sought.	<b>Acceptable</b> No further clarification is required.
ES Compliance Ref: 44	Clarification (Concerns)	The ES states that the construction programme and phasing is not known at this time but " <i>could be built out over approximately 2 years...it may occur over a greater number of years, earliest practicable completion has been used within the EIA to establish a basis for assessments and sensible/worst case</i> " (paragraph 4.37) It should be noted that for some assessments a shorter	The Applicant provides clarification of the approach to the construction timescale, confirming the assessment is based upon peak construction period and that the timescale is a reasonable scenario.	<b>Acceptable</b> This FRR accepts the clarification however BC should ensure through conditions at detailed planning that any material changes to the construction timescale are considered for impacts upon the assessments conducted in the ES.

		timeframe results in less significant 'temporary' construction effects. The assessments should reflect the uncertainty as to the programme and phasing and reflect the worst-case scenarios if these are based on a longer than 2-year construction timeframe.		
ES Compliance Ref: 45	Clarification (Concerns)	The Applicant has scoped out consideration of waste as unlikely to have significant effects, however Schedule 4(1) of the EIA Regulations require that the ES should provide within the description of the proposals an estimate of the anticipated waste generated for both construction and operation phases. Whilst accepted that this is an outline application, and a waste strategy will be prepared at Reserved Matters stage; the Applicant should provide worst case parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.	The Applicant has provided additional information as Appendix 3 to the IRR Response including a reasonable estimate of volume of construction waste by element of proposed outline scheme (Table 1) and estimated indication of volume/weight of operational waste based on Pinewood West and East waste arisings (Appendix 3 paragraph 12 and 13).	<b>Acceptable</b>  This is acceptable and is not considered further information under the EIA Regulations.
ES Compliance Ref: 46	Clarification (Concerns)	<b>Schedule 4(4)</b> The Applicant undertook an internal scoping process with topics scoped into the assessment as likely to be significantly affected clearly identified within the ES. The ES appendices (Appendix 2.1) provide qualitative rationale, based on professional judgement, for the	The Applicant provides additional information on the extent of the remaining mineral reserves confirming mineral extraction has been undertaken to its maximum extent at the site.	<b>Acceptable</b>  No further clarification is required.

		<p>scoping out from further consideration within the EIA process the following topics:</p> <ul style="list-style-type: none"> <li>• Agricultural land (soils)</li> <li>• Archaeology (cultural heritage)</li> <li>• Built heritage (cultural heritage)</li> <li>• Water resources, Flood Risk and Drainage (water)</li> <li>• Lighting (population, human health and biodiversity)</li> <li>• Risk or Major Accidents and/or disasters</li> <li>• Materials and Waste</li> <li>• Ground conditions and contamination (soil)</li> </ul> <p>The rationale for scoping out of agricultural land, references previous soil quality on the site prior to mineral extraction activities, with no assessment of soil quality on the site (still under restoration) provided. Buckinghamshire Council may have additional information on the quality or importance of agricultural soils on the site following the required restoration of the quarry activities to agricultural use. However, in principle the rationale appears sound.</p> <p>In relation to material assets no reference is made within the ES to the potential for further mineral reserves on or in proximity to the site. Buckinghamshire Council should satisfy themselves that any development does not lead to</p>		
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		sterilisation of unworked mineral reserves within the site boundary or in close proximity.		
Sustainability Statement Ref: 47	Clarification	Clarify whether the Sustainable Construction SPD or the Chiltern Core Strategy have been considered in the development of the Sustainability Statement.	The Applicant has acknowledged that the Sustainable Construction SPD or the Chiltern Core Strategy have not been included in their review but have addressed the issues raised in both documents. The one outstanding issue relating to brownfieldland is discussed in Ref 48.	<b>Acceptable</b> No further clarification is required.
Sustainability Statement Ref: 48	Clarification	The consideration of the use of brownfield land has not been reviewed in the Sustainability Statement.	The previous site use has been clarified as brownfield land.	<b>Acceptable</b> No further clarification is required.
Sustainability Statement Ref: 49	Clarification	Air quality and noise impacts are not discussed in the Sustainability Statement. Confirm that these are addressed in other supporting documents to the application.	Air quality and noise impacts have been reviewed separately by specialists.	<b>Acceptable</b> No further clarification is required.
Sustainability Statement Ref: 50	Clarification	Transport impacts are not reviewed in this report and should be reviewed alongside CS4.	Transport impacts have been reviewed separately by specialists and the summary included in the Sustainability Statement.	<b>Acceptable</b> No further clarification is required.
Sustainability Statement Ref: 51	Clarification	It is expected that the applicant will use site features to maximise passive design measures. This should be explicitly detailed.	Acknowledging that this is an outline application, the applicant has made reference to their intention to implement passive design features. It is expected that this will be explicitly detailed at reserved matters stage.	<b>Acceptable</b> No further clarification is required.
Landscape Strategy Ref: 52	Clarification	The Applicant should clarify whether the landscape design approach includes landscape and visual integration as a key driver.	The Applicant has highlighted that the Landscape Strategy been informed by separate landscape and visual and ecological appraisals (Para 1.2.1) and that the creation of an appropriate setting and framing of the new buildings is a key driver (para 1.0.2).	<b>Acceptable</b> No further clarification is required.
Landscape Strategy Ref: 53	Clarification	Clarify whether Figure 1.1 includes Public Right of Way.	The Applicant notes that Figure 1.1 does not include the Public Right of Way; however, as this is shown on Figure 1.3, no further action is required.	<b>Acceptable</b> No further clarification is required.

Landscape Strategy Ref: 54	Clarification	The Landscape Strategy should also refer to the objectives and opportunities identified in the Colne and Crane Green Infrastructure Strategy.	The Applicant states that these are provided in the Planning Statement. The reviewer is content that this has been adequately addressed.	<b>Acceptable</b> No further clarification is required.
Landscape Strategy Ref: 55	Clarification	The Applicant should clarify the constraints associated with the underground pipeline.	The Applicant has identified the easements of the pipeline in their response and states that appropriate approvals will be sought at the appropriate juncture. Whilst this would have been helpful to include within the ES, no further action is required.	<b>Acceptable</b> No further clarification is required.
Landscape Strategy Ref: 56	Clarification	The degree of hedgerow loss associated with the three proposed vehicular access points off Pinewood Road needs clarification.	The Applicant has identified that each access would result in loss of no more than 20m of hedgerow, as advised by the highways consultants. This is considered acceptable.	<b>Acceptable</b> No further clarification is required.



### 3.0 Summary of Mitigation Measures

3.1.1 **Table 3.1** below provides a summary of mitigation measures proposed by the Applicant across, the topics that the Temple Team have been commissioned to review, both embedded and additional as captured in the IRR.

**Table 3.1: Summary of Mitigation Measures**

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
LVIA	Pre-Construction	None	None
	Construction	<p>Avoiding damage to landscape features selected for retention including all A and B grade trees and their root protection zones (in accordance with best practice guidance including BS5837:2005 Trees in relation to construction).</p> <p>Avoiding soil compaction due to construction activity in areas to be planted through the preparation of a construction exclusion zone and/or ground protection (in accordance with BS5837:2005 Trees in relation to construction).</p> <p>Appropriate handling and storage of soil (in accordance with best practice guidance including the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2009).</p> <p>Sensitive design and use of temporary lighting after dark to ensure light spillage is kept to a minimum (particularly in proximity to adjacent residential properties), views of light sources are avoided, and temporary light buffers are used where necessary. Lighting will be designed by the appointed contractor in accordance with the appropriate British Standards and guidance to minimise light spill beyond the Site and protect amenity of adjacent properties.</p>	None
	Operation	<p>Keeping building heights lower in proximity to visual receptors (residential receptors).</p> <p>Retaining all high and medium value trees with appropriate root protection buffers where possible, as identified by the Arboricultural Impact</p>	<p>Consideration of the opportunity at Reserved Matters stage for creation/enhancement of an east-west pedestrian/cyclelink (as highlighted in the Colne and Crane Green Infrastructure Strategy) east-west across the site, ideally linking with existing public</p>

		<p>Assessment (see Appendix 7.2);</p> <p>Where vegetation losses are unavoidable (e.g., at access points and to enable widening at Five Points Roundabout), providing more replacement trees and shrubs than the numbers that will be lost;</p> <p>Managing existing trees and hedgerows to improve their condition and ensure their long-term survival;</p> <p>Creating a green infrastructure buffer of 25-30m depth around the majority of the Site (as shown on Figure 4.6: PP4 – Green Infrastructure), except for where access points;</p> <p>Within the green infrastructure buffer, and adjacent to residents, providing a minimum 15m deep woodland belt comprising native trees and shrubs to minimise visibility of the Proposed Scheme from outside the Site and provide a buffer for local residents;</p> <p>Within the green infrastructure buffer, and adjacent to Black Park where the PRoW is located along the site boundary, providing a minimum 10m deep woodland belt to provide additional filtering for views from this footpath;</p> <p>Planting the woodland belts as a mixture of whips, featured trees and standards) to provide between 0.6 and 3.5m height on planting to achieve a height of 10-13m after 15 years (based on an average growth rate of 650mm/year);</p> <p>Designing lighting in accordance with best practice including the appropriate British Standards to minimise light spill beyond the Site, limit views of the light sources and protect amenity of adjacent properties.</p>	<p>footpaths along the eastern edge of Pinewood Road.</p> <p>Preparation of detailed landscape proposals at Reserved Matters stage to provide a robust framework of vegetation for landscape and visual integration purposes.</p> <p>Careful consideration at Reserved Matters stage of the colours and textures of building materials.</p> <p>Careful consideration at Reserved Matters stage of the treatments of signage, security fencing, lighting columns and other free-standing features along the site periphery.</p>
<b>Climate Change</b>	Pre-Construction	None	None
	Construction	Site Waste Management Plan and Construction Environmental Management Plan	None

	Operation	<p>“Fabric first” approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2013;</p> <p>100% low energy (LED) lighting;</p> <p>High efficiency gas boilers or low carbon heat pumps where heating is required;</p> <p>10% of the site’s energy delivered through low carbon renewable energy.</p>	None
<b>Air Quality</b>	Pre-Construction	None	None
	Construction	None	Dust mitigation to be included in a Construction Environmental Management Plan (CEMP).
	Operation	None	None

**Additional Recommended Measures**

**Compliance Review**

The Applicant should provide worst-case scenario parameters for construction and operational waste based on quantum of development and anticipated visitor numbers, which are substantial, to inform the LPAs understanding of the proposals.

Buckinghamshire Council should satisfy themselves that any development does not lead to sterilisation of unworked mineral reserves within the site boundary or in close proximity.

**Landscape and Visual Impact Assessment**

A Landscape and Ecological Management Plan should be prepared at the Reserved Matters stage.

**Climate Change**

Provide details of how mitigation measures can be further developed at later design stages and monitored during construction and operation.

**Air Quality**

It is recommended that the Local Planning Authority agree appropriate monitoring requirements by condition.

It is recommended that the Local Planning Authority require a Dust Management Plan to be included in a Construction Environmental Management Plan by condition.

**Sustainability Statement**

A planning condition should be raised to ensure the development provides 10% of its energy requirements from renewable or low carbon sources.

A Materials and Waste Management Strategy is required to support the reserved matters application. It is recommended that the material use proposals within the whole life carbon assessment is considered as soon as possible to make the most meaningful impact.

A construction stage water management strategy is required to support the reserved matters application. A

Site Waste Management Plan is required to support the reserved matters application.

A Drainage Strategy is required to support the reserved matters application.

An Energy Strategy is required to support the reserved matters application.

An Overheating Report is recommended to support the reserved matters application.

### **Additional Recommended Measures**

Require appropriate monitoring to demonstrate that the CLP is ensuring that effects from construction traffic are negligible.

Electric Charging Points should be provided in line with parking policy.

### **Noise and Vibration**

Consideration of the acoustic impacts of overheating mitigation strategy for summer cooling.

### **Greenhouse Gases and Climate Change**

GHGs to be more accurately quantified to allow appropriate targets to be set and monitored throughout the construction phase. A commitment to monitor GHG's emissions during the construction period should be included.

Production and periodic review of a Climate Change Adaptation Plan to formally account for the risks identified in the assessment.

### **Wind**

Subject to clarification by the Applicant, additional shelter for location 232 on the Block A roof terrace on two adjacent sides of the seating area. The shelter could be composed of dense planting or hedge at least 1.5m in height or hard screening at least 1.5m in height and no more than 50% porosity.

## **Amenity Societies/Residents Associations**

### **Iver Heath Residents Association**

(24.11.21)

Firstly, we note that the revised description does not now specify the split between "education" and "business." Previously this was 50/50 between the two in terms of the area of 50,000 sq.ft. We, therefore, question the rationale for and significance of this change and would wish to point out that all consultation and 3rd party representations to date have been based on the former.

Turning now to the Environmental Statement Addendum and associated documents (ESAs) we note that these run to some 23 documents. Otherwise, the applicant has submitted a summary of and responses to representations – a further 9-10 documents – for better 'lay' understanding which the applicant advises "do not change any of the applicant's proposals".

Notwithstanding these general observations, we consider the requirement to submit responses by 26<sup>th</sup> November (recently extended, we believe, to 30<sup>th</sup>) unrealistic to enable IHRA and other stakeholders with legitimate interest to evaluate the new technical substance of the information, once separated from the applicant's commentary upon it.

That said, in terms of the technical content of the ESAs, we note that further evaluation by Temple Consultants (TC) has not been uploaded. TC has previously raised "concerns" regarding the technical content of the application. These included the methodology adopted for modelling air quality impacts. For example, amongst other Regulation 25 requests for information (items 26-29, P20 in their report). In fact, in that report TC advised that the AQ modelling should be re-done. As such:

a. Has it been re-done?

b. Does it overcome TC's concerns?

It is a legitimate interest of our members and the wider community to understand at this stage and prior to preparation of your report, that the R25 was fulfilled and that such critical and fundamental technical flaws, as identified, have been addressed in each instance.

Pending further notification of the submission of such amended reports and documentation, we assert that the objections and concerns as previously set out by our letters dated 29 October 2020 and, on our behalf, by Bell Cornwell, have not been addressed by the ESAs and associated reports of which we have been notified.

Otherwise, we would additionally wish to associate ourselves closely with the comments made by The Gardens Trust – particularly in respect of the absence of a Heritage Impact Statement – dated 12 November 2021, as well as those made by The Ivers Parish Council and Colne Valley Regional Park.

In conclusion, we also wish to reiterate here our objection to this application whilst we acknowledge the social, economic, and historic contribution made by Pinewood Studios in South Bucks.

In the simplest terms, this proposal is not suited to this location and the case for “very special circumstances” cannot be fairly applied; that critical transport management, highways, environmental and ecological matters “of concern” raised by Buckinghamshire Council’s (BC) appointed consultants have not, yet, been addressed even at this late stage in the process.

These are not, therefore, matters that should be reserved for further applications or applied conditions.

As such we urge that this application should either be refused because of the identified technical shortcomings or withdrawn by the applicant.

IHRA for its part would welcome the opportunity to participate in a wider master planning exercise for Iver Heath led by Buckinghamshire Council, The Ivers Parish Council and Pinewood Studios Group as well as other local landowners with full and meaningful engagement of residents, the wider community and stakeholders delivered via a series of co-designed site-specific Development Briefs and a Neighbourhood Development Order.

Finally, in terms of “mitigation” should BC be minded to approve this application we acknowledge, with reservations, the measures tabled via the Wexham and Ivers Community Board to which we would wish to add the following:

Local Wildlife Recovery – contribution towards a 10-year project to preserve and enhance the remaining natural landscape and eco-system services in Iver Heath and the wider Colne Valley.

Creation of a fund, to be administered by a newly created Community Land Trust, for purposes of the co-design and delivery of a project providing in parallel to ecological recovery and new ‘green infrastructure’: long term local education, training, recreational, health and economic benefits from that project. We envisage a contribution not less than £1m per annum over that 10-year period. Otherwise, in terms of planning conditions, we consider it essential that the highways works

to Five Points Roundabout (FPR) and Sevenhills Road (SHR) be required via S106 and S278 undertakings and the subject of pre-commencement conditions. The reason for this being that extent and duration of the works as envisaged by this application could not be delivered with minimised environmental and health impacts upon the day-to-day lives of residents without their prior construction.

(22.12.2020)

On behalf of our client, Iver Heath Residents Association, we write to set out our objections to the current application at Pinewood Studios (application reference PL/20/3280/OA). This is an outline planning application with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq. ft (70,000 sq. m) comprising:

- A visitor attraction of 350,000 sq. ft comprising a series of buildings
- 350,000 sq. ft of film production buildings (including sound stages, workshops, offices and an external film backlot)
- An education hub (25,000 sq. ft)
- A business growth hub (25,000 sq. ft)
- Together with associated parking and servicing plus Green Infrastructure

Our objection covers a number of categories and we have had regard to the technical information which accompanies the application. This includes the Planning Statement, the Transport Assessment, the Environmental Statement and the Development Framework Design and Access Statement.

#### Planning Policy

The applicant's assessment of the legislative basis for the determination of the planning application is incomplete. They state, at para 7.1 of the planning statement that:

"The legislative basis for decision making is Section 70(2) of the Town and Country Planning Act 1990 which requires a local planning authority in determining a planning application to have regard to the development plan insofar as it is relevant and other considerations that are material and Section 38(6) of the Act".

However, they do not quote Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise". (emphasis added).

The NPPF summarises this at the beginning of the document stating, in para 2 that

"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise."

The applicant seeks to diminish the importance of the development plan as the starting point for decision making. The development plan for the area, particularly with regard to the Green Belt, remains consistent with national policy and should therefore be given full weight. Overall Impact of the Proposal on Local Residents

We start by making an overarching and general objection – which is the overall impact of such a considerable proposal on local residents. The starting point is that the development is contrary to policy

– it is outside any settlement and therefore lies in the countryside. The site is also within the Green Belt. We have not provided a technical response on every issue but have restricted ourselves to the key planning issues – however, it is evident that an application of this scale will have impacts such as noise, air pollution, traffic generation, increased activity levels which will fundamentally impact on residential amenity and quality of life in the vicinity of this proposal. The construction of the site would continue for a number of years – resulting in additional disturbance to residents. Green Belt Impact

The NPPF (2019) para 133 confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Para 143 sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

A number of Green Belt assessments were carried out to support the preparation of the Chiltern and South Bucks Local Plan (which was withdrawn earlier in 2020). The Strategic Level Green Belt study from 2018 describes the existing Pinewood Studio Development as being a ‘contained employment use’. The extent of the Green Belt in this general location is seen as having a strong role in preventing the merging of settlements. None of the independent Green Belt studies (which were all carried out in recent years and should therefore be considered up to date in terms of accurately reflecting the position on the ground) recommend this area for release from the Green Belt.

Developing here can only be described as urban sprawl which would result in the merging of the existing Pinewood studios site with the residential development to the south of the Uxbridge Road. Additionally, Pinewood Road was seen as a defensible boundary to the Green Belt in this location through the Chiltern and South Bucks Local Plan.

The proposal would conflict with the first three purposes of the Green Belt. There is a difference between the independent assessments carried out to inform the Chiltern and South Bucks Local Plan and the applicant’s assessment.

a) To check the unrestricted sprawl of large built-up areas;

The applicant does not consider that this application would result in ‘sprawl’ despite the proposal covering 32 hectares of the Green Belt.

The argument is confused, stating, at para 8.12 of the planning statement that as the proposal is justified by exception it will not represent unrestricted sprawl. However – this is not the correct assessment which is the contribution that the site makes to the five purposes of the Green Belt. Very special circumstances are not relevant to this assessment.

Our assessment is that the proposal would (in any considered assessment) clearly result in a sprawl of development which would fill in what is effectively a gap between the existing



extent of the Pinewood studios site and the Uxbridge Road, with residential development to the south of this.

b) To prevent neighbouring towns from merging into one another

The applicant's assessment is that the proposed development will not result 'in the merging of towns in any physical sense'. However, it will certainly be a significant development covering 32 hectares of what are basically fields. The proposal would diminish the gap between existing development.

c) To assist in safeguarding the countryside from encroachment

The development of 32 hectares of Green Belt would have a significant impact in terms of physical encroachment into the Green Belt. The applicant accepts that there is harm to this Green Belt purpose.

Para 144 of the NPPF states that local planning authorities should ensure that 'substantial weight' is given to any harm to the Green Belt when determining planning applications. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal, is clearly outweighed by other considerations. This is the key planning judgement when considering this application in terms of the Green Belt assessment. Para 145 of the NPPF explains that the construction of new buildings is inappropriate in the Green Belt – setting out a number of exceptions (which are not relevant to this application).

Therefore, the development is correctly defined as inappropriate development in the Green Belt which would be harmful (this is accepted by the applicant within the planning statement) therefore the judgement is whether or not the applicant has demonstrated very special circumstances that would justify this inappropriate development.

The applicant also provides an analysis of the use of land within the Green Belt, as part of their justification for the proposal. This focuses on para 141 of the NPPF which states that: "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land". (emphasis added).

This is clearly envisaged as a planning role for a local authority to pursue – this would be taken forward through a Local Plan. This is confirmed by the Planning Practice Guidance which accompanies the NPPF.

It is incongruous for the applicant to seek to justify (as set out in para 8.38 of the planning statement) that this scale of development with the consequent impact on openness would assist a local authority in implementing this part of national policy by providing green infrastructure and net biodiversity gains.

## Very Special Circumstances

The applicant analyses very special circumstances within section 8 of their planning statement, setting out a number of matters which they consider constitute the very special circumstances to outweigh the presumption in national and development plan policy against inappropriate development in the Green Belt.

Very special circumstances have to be carefully considered on a case by case basis. The assessment of these is a planning judgement by the decision maker.

Firstly, we do not consider that there is a locationally specific justification – there are other Pinewood Studios and ‘Screen Hub UK’ could be located elsewhere as co-location is unnecessary. A location could easily be chosen which is not in a sensitive Green Belt location. We understand that at a recent meeting Pinewood declared that there would be no access to the Studio facilities from the ScreenHub and vice versa. This supports the case that there is no requirement at all to build the Screen Hub on this particular piece of adjacent land - it can in fact be built anywhere.

We note the comments regarding the implementation of the Government/LEP approved Industrial Strategy, however, do not see any specific reference to Pinewood Studios within the Government documentation. The references in the Buckinghamshire specific LEP strategy refer to the current businesses and approved expansion plans at Pinewood.

We do not accept that these strategies constitute very special circumstances which justify inappropriate development in the Green Belt. There is no reference within them of a requirement for further expansion into the Green Belt in the area of Pinewood. These are strategies rather than policy – and any land use implications of them should be taken forward, if necessary and appropriate, through the development plan rather than via speculative planning applications. This would allow any proposed allocation to be properly justified through the plan-led process, which is underpinned by evidence and subject to public consultation and independent Examination by an Inspector.

Any identified requirement for the Pinewood site to be expanded further should therefore be considered through the future Buckinghamshire Local Plan – which is the correct mechanism to consider any changes to the Green Belt boundaries in this location.

Whilst we accept that there would be economic benefits arising from the proposal – this does not justify the development in this sensitive Green Belt location. We note that Buckinghamshire Council has previously referred to the Green Belt as a justification for opposing speculative development (Council meeting October 2020) with regard to the withdrawal of the Chiltern and South Bucks Local Plan). The decisions of the Council must be made on a consistent basis. If the Green Belt is to be cited as a justification for not meeting the housing needs of the Chiltern and South Bucks area of the County then it would be inconsistent to not apply this assessment to this application.

The applicant also sets out that there will be considerable environmental benefits of the proposal, largely resulting from additional planting. Whilst these may be benefits of the proposal – they cannot be seen as outweighing the harm to the Green Belt – or the harm from other elements of the proposal such as traffic, which we discuss below.

## Traffic

We also wish to object to the application due to the additional traffic that would be generated by the proposal. The proposed development will add considerable pressure to the local road network through trip generation which is assumed as between 5,000 and 8,500 visitors per day and 3,500 employees. The network in the vicinity of the site is already congested. The Transport Assessment (TA) that has been submitted with the application shows that a number of the key junctions in proximity to the site are already operating over their maximum capacity.

The applicant proposes to implement a 'robust sustainable transport strategy' but we consider that the assumptions made regarding sustainable travel are unrealistic. The expectation is that only 50% of visitors will be arriving by car within five years. This is highly unlikely and does cast doubt on the assumptions within the TA. It remains probable that the majority of visitors will choose to travel to the site by car. Whilst the TA states that there are a number of railway stations close to the site, none of these are within easy walking distance and would require additional bus trips to get to the site.

Additionally, it is considered highly improbable that anyone would even try to reach the site on foot from any of the surrounding train stations because they are some miles away, the roads from those stations to the site do not all have pedestrian pathways and there would be no realistic and safe way to do this journey other than in a vehicle.

Car parking is a reserved matter but we note that the spaces which are currently proposed within the TA do not seem sufficient for the forecast visitor/staff numbers which will inevitably lead to pressure to park on local roads.

Traffic policy as set out in the NPPF (para 109) states that

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual impacts on the road network would be severe".

We assume that the highways authority will be making a thorough assessment of the highways implications and whether or not the assumptions within the TA are realistic and reasonable.

## Heritage

The site lies in close proximity to a number of designated heritage assets. These include the following:

- Little Coppice which is a Grade II Listed Building
- Langley Park which is a Grade II Registered Park and Garden with associated Listed Building
- Heatherden Hall and associated structures including Lodge, Gates, Gate Piers and Ornamental Garden Structures (Grade II Listed Building).
- St Margaret's Church, Iver. Grade II Listed Building.

The applicant has stated that there will not be any heritage impact and to our knowledge has not supplied a heritage impact assessment with the application, which we consider an omission.

We disagree with this applicant's assessment, stating that there is no heritage impact, which we do not consider is properly balanced and is a significant omission which needs to be remedied before the application can be determined. We support the comments of the Council's heritage officer in this regard.

Given the proximity of the heritage assets (particularly Little Coppice and Heatherden Hall), there will undoubtedly be an impact which needs to be properly assessed and considered through the determination of this application. The relevant paragraph of the NPPF (2019) is 196 which states that:

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

We also wish to object due to the impact of the proposal on Black Park and the Colne Valley Regional Park.

We note that the permissive path from Iver Heath and Black Park would be lost and a new one provided and understand that the existing route is well used (and that usage has increased in the current pandemic). The proposed replacement path does not appear to be in an attractive location (and for example goes through a car park). We therefore support the comments made by the Colne Valley Park Community Interest Company in this regard.

The impact on Black Park itself would be considerable – the applicant describes the impact of buildings up to 21.5 metres high close to the east of Black Park as 'not significant'. This is another example of the applicant seeking to understate the considerable impacts of the proposals. Of course buildings of this scale – plus the disturbance from the associated activity levels, would be highly significant and detrimental to the Park.

Additionally, we are concerned that within the Environmental Statement which accompanies the application, the implications of the development on the ecology of the site and the surrounding area have again been described as 'negligible'. We hope that these conclusions are thoroughly examined by the Council's ecology team.

We also support the comments from the Environment Agency which make it evident that the application is deficient in information as the proposed development is not compatible with the Environmental Permits for landfill, waste treatment and mining waste which are currently active and held by the site.

The Environment Agency also make the valid point that the Environmental Statement does not include a land contamination chapter and we agree that this is completely unacceptable given the former use of the site as landfill. New pathways could be created by any development which would allow contamination to enter the wider environment, having wider ranging impacts on ecology.

We hope that these comments are helpful. Please do not hesitate to contact the writer if you need any further information.

(29.10.2020)

These comments are made on behalf of our members and residents that have asked us to represent their views at this stage.

As such IHRA is unable to support this proposal for the following reasons:

1. A potential technical non-compliance by the Buckinghamshire Council with Statutory Instrument 2015 No. 595, The Town and Country Planning (Development Management Procedure) (England) Order 2015, Part 3, S5(2). Therefore, there might be insufficient detail to enable either the LPA nor consultees nor parties with a legitimate interest to properly assess the application as required. Further that:

2. The application should not be considered separately from reserved matters because the application is for a Major Application and, as such, Buckinghamshire Council as the LPA should require the applicant to withdraw and resubmit the application following consultation with stakeholders and the local community.

3. Notwithstanding the above, the detailed concerns regarding the development proposals include

those set out by BREEAM New Construction Manual Headings:

- Management
- Health & Wellbeing
- Energy
- Transport
- Water
- Materials
- Waste
- Land Use & Ecology
- Pollution
- Innovation

In particular that 'Very Good' is an insufficient target for a UK Global Screen Hub of international reputation and ambition. The LPA should be seeking a far higher standard of sustainability to offset the negative environmental impacts of this development. 'Excellent' should therefore be set as the minimum and verifiable standard for Major Projects of global significance with 'outstanding' achieved for certain categories such as Energy, Land Use and Ecology.

4. That, at the very least, in the absence of a withdrawal of the application by the applicant, an extension of the statutory determination period should be agreed with the applicant to ensure that the outcome of any Judicial Review concerning Application No. PL/19/4430/FA [Sevenhills Road and part of Southlands and Pinewoods Road, to the North East of Pinewood Studios...] can be properly taken into account. The latter which may be sought as this application did not take into account nor refer to, so far as we can see, the impact of the latter application.

5. Highways matters: we are concerned that the scope and content of the Traffic Impact Assessment undertaken has not properly assessed impacts upon the immediate and wider road network and used insufficient receptors as part of the studies undertaken. We would ask therefore that BC subjects this work to independent technical scrutiny.

6. Environmental Impact Assessment: we are not satisfied that the EIS as submitted satisfies statutory requirements including, for example, Paragraph 2, Schedule 4 of the EIA Regulations and the absence of any (d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.

We would ask therefore that a Scoping Report in this respect is undertaken by an independent expert.

7. Chapter 5 of the EIS is inadequate in this respect as presented, in one instance completely misrepresenting the relevant section of the regulations. This brings into question the integrity of the entire document. As such the LPA should apply Regulation 25 of the 2017 EIA regulations. In such instances, a developer must provide that "further information" before a final decision can be made.

8. As far as the Impact on the semi-rural environment of Iver Heath is concerned, we would wish to entirely endorse the objections and concerns raised by the CPRE as set out in their letter to you dated 18-10-20.

9. As far as the impact on the Colne Valley Park is concerned, we would wish to entirely endorse the objections and concerns raised by the Colne Valley Park CIC as submitted to you.

10. It does not seem that direct and indirect Climate Change Impacts have been assessed. For example, the Strategic Economic Case supporting this application is founded in large part upon The Buckinghamshire Local Industrial Strategy. We note, however, that there is scant reference in this document to any Environmental Impacts. Strategic Policy such as this, prepared with the involvement of DCMS, we would expect be required to meet the same standard as National Government departmental policy in this respect.

11. Former Draft Local Plan Policy DMEP4 anticipated no expansion of Pinewood Studios outside the allocated plan area to adjacent Green Belt land as follows:

#### 6.9 Enterprising - Pinewood Studios

6.9.1 Pinewood Studios is a film and television studio complex of international importance which makes a significant contribution to the UK film industry and the national economy. The Council will support film studio and media use on the site.

#### Policy DM EP4

#### Enterprising – Pinewood Studios

Planning permission will be granted for extensions, new buildings and conversions within the Pinewood Studios site provided that it can be demonstrated that the proposals are for uses directly connected with film production or associated media industries and would not cause unacceptable transport or environmental impacts or effects.

12. In relation to the emerging Ivers Neighbourhood Plan, IHRA is promoting the adoption of the following draft Policy regarding Pinewood Studios:

TINP PS01 (Draft)

1.0 Pinewood Studios

1.2 Pinewood Studios is a film and television studio complex of international importance which makes a significant contribution to the UK film industry and the national economy. The Parish Council supports film studio and media use on the existing site.

1.3 Planning permission should be granted for extensions, new buildings and conversions within the Pinewood Studios site provided that it can be demonstrated that the proposals are for uses directly connected with film production or associated media industries and would not cause unacceptable transport or environmental impacts or effects.

1.4 The Pinewood Studios site is shown on the Policies Map.

Given the technical and management concerns raised, we would urge Buckinghamshire Council to require the applicant to withdraw this application and be urged to undertake a comprehensive and meaningful consultation with all stakeholders ahead of any resubmission and enter into a Planning Performance Agreement.

Otherwise we are seeking that this application be refused.

In the event that the application is successful we would support calls for a Judicial Review through the Superior Courts.

### **Colne Valley Regional Park**

(26.11.21)

We have reviewed the various documents and adjustments to the application and maintain our strong objections to this proposed development in the Green Belt. We refer to our objections submitted in October 2020 and February 2021.

We note that whilst there are important details considered in the revised information and plans (for example, environmental impact, air quality, biodiversity net gain, bats and reptiles, waste disposal, traffic volumes and sustainable construction) these are secondary to the fundamental issues of principle concerned with this inappropriate application.

It is necessary for the Colne Valley Regional Park and the Council to focus on the 'big picture' issues – about what this latest large development proposal means for the Green Belt at Pinewood and generally around the Ivers area. We consider that none of the additional information or adjustments to the application change those considerations, and are minor in relation to the colossal scale of this proposal.

They do not lessen the impact or significantly improve the mitigation package in any substantial way.

The fact remains that the site will be dominated by extensive urban development and the overall effect will be to greatly urbanise this part of Iver/ Iver Heath and the countryside setting of those villages and Black Park.

The argument being advanced is that those Green Belt considerations are offset by the 'very special circumstances' advanced by the applicant. However, those circumstances must be considered in the context of:

- The changes and additional development that have already been put forward (and accepted at appeal) around Pinewood Studios

- The sensitivity and fragility of the Green Belt in this locality
- The massive scale of the development and how it will draw an enormous number of people and activity into the Green Belt – both visitors and workers and their attendant needs for accommodation, traffic movements, the associated negative impact on air quality and the urbanising effect of all this on a valuable area of Green Belt
- Of great importance in considering this application is that the fundamental aim of Green Belt policy is “to prevent urban sprawl by keeping land permanently open”
- The fact that this major proposal and its consideration is all taking place outside of the development plan – the medium by which a more strategic view should be taken on the future of the Green Belt

The changed information on green infrastructure and building heights make no material difference to the overall impact this huge development has on the openness of the Green Belt – a development of some 750,000 sq feet of buildings, more than 2,300 car spaces and buildings as high as a multi-storey car park or a seven-storey block of flats.

If the Council attaches great weight to the status and importance of the Green Belt in this area it must:

- Make a stand against this huge development and recognise the strategic importance of keeping the openness of the Green Belt here
- Bring a stop to the creeping urbanisation that threatens to overwhelm the area
- See that the circumstances being put forward are not sufficiently ‘special’ in the context of the area and the history of expansion at Pinewood.

We believe strong co-ordination and planning for the future of the Green Belt is needed so its openness is maintained and the open land can serve its role as a green resource for public health and wellbeing, and for environmental enhancement.

A strategic vision of what is happening in this section of the Green Belt is needed.

We stand by our original, strong, objections to this development, which in summary are:

- Conflict with Green Belt policy
- Harm to the rural environment and countryside character through significant urbanisation (both directly from this development and the future pressures it will bring for more development and urbanisation)
- The inadequate provision for comprehensive and high quality walking and cycling routes in the locality and the failure to bring forward appropriate re-provision of the ‘Peace Path’.
- Generally that the mitigation package<sup>1</sup> on offer fails miserably to mitigate and compensate for the strategic adverse impact on the Green Belt and Colne Valley Regional Park (not just individual factors that may be assessed through the EIA). This is a key issue in the planning balance.

Addenda

Note about the Peace Path

By way of example the agents’ claim that “the new Peace Path should be considered as an improvement and a benefit”. This is without reasonable foundation. We note the comment



by Temple Group (for BCC) that “The proposed alignment of the permissive footpath through a car park would be relatively unattractive for those people who value walking through countryside.” The ‘replacement’ path proposed in the application takes a circuitous route around a huge car park which will not represent walking through countryside or anything close to it. The replacement path location is also significantly worse in terms of its connectivity for residents of Iver Heath to reach Black Park and it does not connect better into the rights of way network.

#### Note about the public consultation process

Whilst our objections relate to the development itself we also express concern at a public consultation process that has only in the last few months released publicly reports by the Temple Group that appear to date from January and November 2020. As part of preparing this response we note that new information and plans have been submitted by the agent during November 2021 including a “Screen Hub UK ‘A new Peace Path – above and beyond for better access More accessible and attractive’ (November 2021)”. Is further public consultation to be undertaken on this additional material?

#### Turley criticism of CVRP objections

The applicant’s agent criticises the CVRP’s objections to this development in part because the CVRP has not undertaken the planning balance, weighing the benefits and case in favour of the development (eg economic growth and jobs) against the adverse impacts (particularly on the Green Belt and its openness). This ‘balancing’ role rests with the decision maker on the application, not the applicant or third parties. The judgment of the CVRP is that the protection of the Green Belt in this area is of paramount importance and that, as a general principle, it is a consequence of having the Green Belt that jobs and economic growth should be directed to other locations. ’

(04.02.2021)

Supplementary Objection from Colne Valley Regional Park (CVRP) with regard to proposed development on [33] Hectares of land south of Pinewood Studios, Pinewood Road, Iver Heath, Bucks

Application ref: PL/20/3280/OA

#### Part 1: Introduction

1. In October 2020, the CVRP lodged an objection to the above application because of its serious concern over the adverse impact on the Regional Park and the conflict with planning policy, in particular the Green Belt (GB).
2. In December 2020, the agents for the applicants issued a “Response to consultation submissions by the Colne Valley Park Community Interest Company (and others)”. This was dismissive of the concerns raised by the CVRP and, in summary, considered that the submitted application adequately addressed the matters we raised, including its provision for mitigation.
3. The CVRP disagrees with that response and considers that various key aspects are being brushed over by the agents, including:
  - The strategic planning context
  - The extent of the harm arising from the scheme and

- The scale of mitigation that should accompany the development if the very special circumstances' (VSC) were to be accepted by the decision maker (whether the Council or Secretary of State).
4. The CVRP has engaged an independent chartered Town Planning Consultant to clarify and expand on its concerns to counter the Turley Associates' response dated December 2020.
  5. This document therefore supplements our October 2020 objection and is to be read alongside it.

Part 2: Strategic Planning Context to this part of the Metropolitan Green Belt and the CVRP's position in relation to it

6. This section highlights crucially important planning considerations to the proposed development. They are rooted in the National Planning Policy Framework (NPPF) and Development Plan (DP) policies, and are relevant to an assessment of how the development performs against the long established five purposes of the Green Belt. The beneficial side of the Green Belt and the CVRP's role in it
7. Once GBs are defined, NPPF Para 141 calls on local planning authorities to "plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."
8. The CVRP was established in 1965 with the support of a consortium of Local Authorities (including the predecessors of Buckinghamshire Council) to protect and improve this part of the Metropolitan GB, so partly fulfilling the Council's role as set out in Para 141. The CVRP's six objectives (set out in full in our October 2020 objection and included in Annex 1 here) mirror Para 141 – how proposed developments 'perform' against those objectives is a highly relevant consideration.
9. It is now well established that the natural environment and recreation opportunities provided by the Green Belt offer a critical physical and mental health resource for the wider population, as well as being a resource for wildlife. Its protection and enhancement for the long term is fundamental to the role of the CVRP. Once that resource is lost to development, it is lost forever. This flags the importance of there being a scale of mitigation proportionate to that of the development and the harm flowing from it, something we explore in Section 3 below.

The particular sensitivity of this part of the Metropolitan Green Belt

10. The tests for assessing the potential acceptability of 'inappropriate' development in the GB may be the same wherever its location, but the spatial context of the part of GB the site is located in must also be factored into decision-making. It should also inform the nature of mitigation if development is to be countenanced.
11. The application site is situated next to the sub-regionally significant Black Park, but is also close to the edge of the main London urban area. It is in a particularly sensitive and vulnerable part of the Green Belt. In the strategic Green Belt review undertaken by Arup and published by former South Bucks and Chiltern District Councils in 2018, this zone was categorised as part of the coherent 'London Fringe' zone. The report highlighted the characteristics and sensitivities of the part of that zone around the application site, referring to:

"... a strategic arc of open spaces separating the large built-up areas of Greater London and Slough, and smaller settlements such as Iver, Iver Heath ...."

“...a number of narrow bands of Green Belt are vitally important in preventing merging of settlements”

“...these gaps are essential in protecting the merging of the major urban settlements of Greater London and Slough (and the smaller settlements of Iwer and Richings Park)

...”

“ ... any change within this area could act to significantly compromise the role played by the Green Belt in maintaining separation between these two large urban settlements.”

12. It is no coincidence that the extent of the CVRP sits within with the ‘London Fringe’ zone in Buckinghamshire – an area that needs particularly careful attention and planning. The Park is an important area of countryside to the west of London.
13. To promote that careful attention and planning, the CVRP CIC collaborated with a number of other organisations, including the relevant local authorities, to produce the Colne and Crane Green Infrastructure Strategy during 2019. It provides useful guidance in how to best to address the many challenges threatening the area, and is intended to be used alongside – and to inform – Development Plans as well as to “ ... inform both the design of development proposals and their comprehensive mitigation and planning obligations.” It can be found here: <https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/>

Scale of land-take is relevant

14. This is not some small extension to an existing developed site, but a 33 hectare (82-acre) expansion which follows an even larger recent one by the same company, now currently under construction.
15. This is a substantial tract contiguous with other substantial areas of open land – a key factor in why it was designated as GB and CVRP. The analysis undertaken by the applicant’s agents underplays the role the site plays in this wider context.
16. It is an area that should be protected from urbanisation, substantial building forms and intensification of traffic movements. Instead, it should be promoted for agricultural/ other appropriate rural land uses, and people’s enjoyment of the countryside.

Planning for large scale change in the Green Belt, as now proposed, and the Development Plan

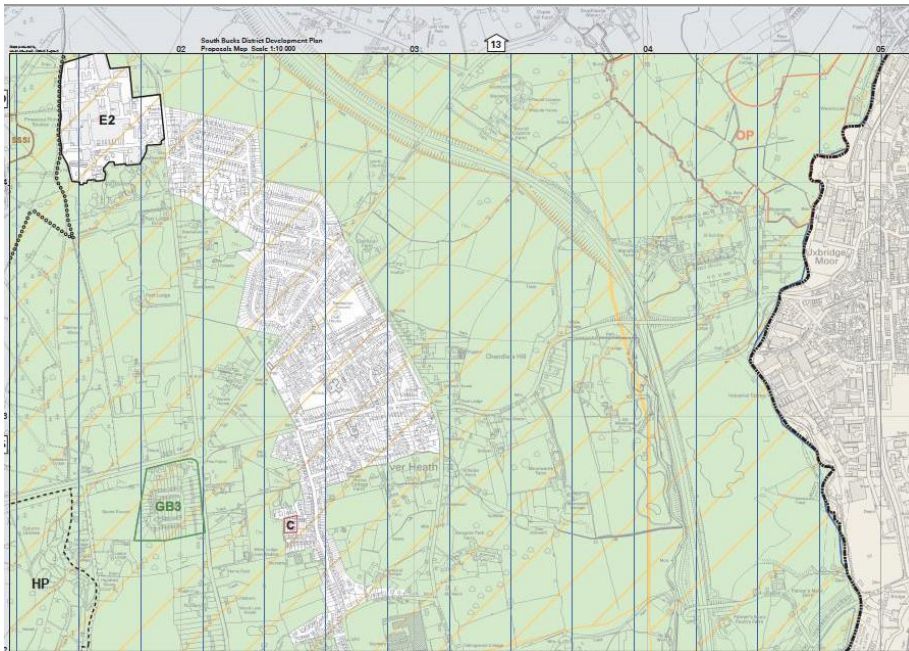
17. The normal and proper place for deciding whether major development should take place within the GB is the Development (or Local) Plan.
18. It is noted that the former South Bucks DC submitted a DP for Examination in 2019, which made no provision for this proposed expansion of Pinewood Studios. This DP was only withdrawn by the current Council from Examination in late 2020, due to concerns expressed by the Inspectors, principally around the ‘Duty to Co-operate’.
19. This is not to suggest that a planning application cannot be submitted outside that process and decided on the ‘VSC’ test, but equally it would not render irrelevant aspects of government policy for the GB that would need to be considered were a development of this scale and nature proposed in a DP.
20. In Turley’s December 2020 response, para 2.29, it says that NPPF para 138 was written with changing GB boundaries in Development Plans in mind and dismiss it as a consideration. Whilst it may be correct to relate this NPPF paragraph to changing GB

boundaries in DPs, Turley's approach is too narrow on how to manage change in the Green Belt.

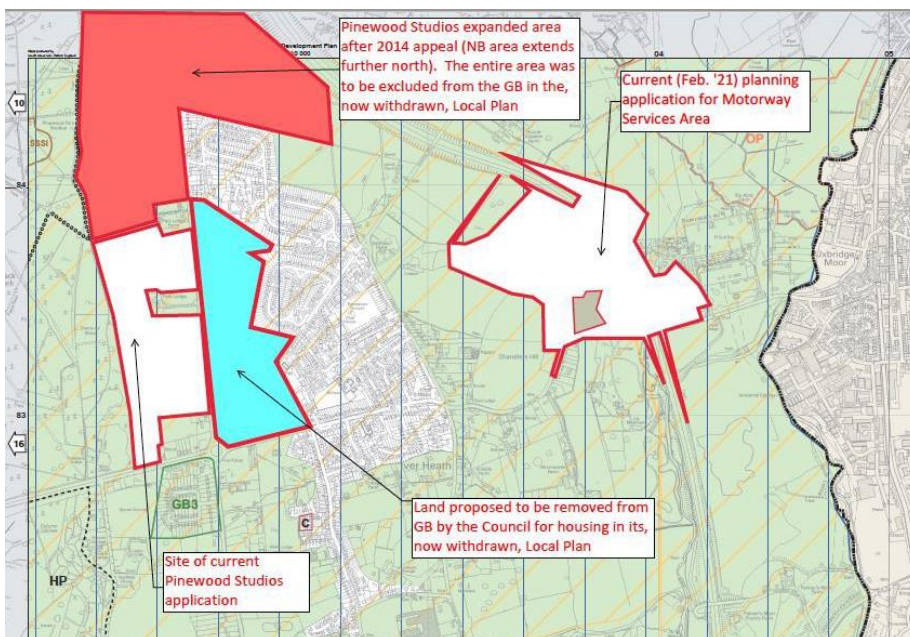
21. We consider that when such a large development is proposed (and one that is in addition to the expansion approved in 2014), the implications for the Development Plan (DP) must also be taken into account. It has not been put forward as a temporary development and, if approved and implemented, a corollary would be the removal of the site from the GB in a later DP review. This is normal practice and was destined to occur in the South Bucks and Chiltern LP to 2036 (until its recent withdrawal), in relation to the expanded Pinewood Studios to the north following approval by the Secretary of State in 2014.
22. NPPF Para, 138 includes the following (our underlining):  
*"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."*
23. We argue that if the decision maker in this case is minded to accept the VSC for such a strategically significant development, it is incumbent on them to consider how to foster the beneficial role of the (remaining) GB as part of offsetting the harm associated with the development. NPPF para 138 provides a framework for that in a manner consistent with the positive approach to existing Green Belts by local planning authorities, called for by government NPPF para. 141 – see paras 7-9 above.
24. Notwithstanding that view, if the application is approved we are in no doubt that national and local planning policy requires a wide approach to mitigation to offset the harmful impact and conflict with GB policy caused by the sheer scale and hugely intrusive nature of this proposed development.
25. The CVRP plays a critical role in promoting the beneficial use of the GB in this area, and would wish to be formally party to mitigation proposals should permission ultimately be granted.
26. Good planning must prevail: it would be inconceivable for key issues relating to the beneficial future of the GB and CVRP to be overlooked when an ad hoc planning application for such a major development is submitted.

The need for a strategic view as to what is happening to this part of the Green Belt

27. Map 1 below shows the current extent of the Green Belt (from the 2011 Adopted Local Plan) whilst Map 2 shows the approximate extent of demands being placed on it.
28. It will be noted that all areas in Map 1 are within the GB except Iver Heath village, the 'established' Pinewood Studios site, and the Hillingdon urban area (also outside the Plan and LA area).
29. From that base, the CVRP is conscious the 'demands' being placed on the GB in this immediate part of the Regional Park are individually, but also cumulatively, very significant. Each 'development' has a case advanced with it for why it needs to happen in the GB. Those needs are inevitably connected with the location being near to London and its actual or perceived economic 'pull'. Unless government policy is reversed – and there is currently no prospect of that happening – the Green Belt remains a core tool of the country's planning system.



Map 1: Extract from 2011 Adopted Local (Green Belt in green – CVRP in orange cross-hatch)



Map 2: Adopted Plan overlain with 'development' land in Iver Heath area

30. There is a point at which it is necessary to stand back, see what is going on, and take a strategic view. That point has now been reached.

31. In terms of an immediate and 'local' strategic view, the demands on the GB and CVRP shown in Map 2 comprise:

- The current proposal for Pinewood expansion
- The Pinewood expansion allowed at appeal in 2014 (an area also proposed for removal from
- the GB in the Council's DP withdrawn from Examination a few months ago)
- A current (Feb 2021) application for a Motorway Service Area on the M25 at Iver Heath

- A large area proposed for removal from the GB to allow for future housing in the Council DP, now withdrawn from examination.
32. The current application must be seen for what it is part of. We recognise that with different proposals at different stages of the planning process it is challenging to make a cumulative impact assessment. But the Council must rise to that challenge, be proactive and implement a positive vision for the future of this increasingly threatened part of the GB, even if it is through its handling of individual applications, rather than through a DP. For the reasons we highlight above, it is an area of the GB that must not be whittled away via ad hoc decisions, only for the authorities to subsequently look back and realise what has actually happened.
  33. With each significant incremental step to develop land in the GB we argue that the harm caused to it increases with each step. This is not only because of the unique large size and impact of the proposal individually, but also because it should be assessed as part of a cumulative change and deterioration to the GB from the GB baseline when it was designated. There is a point at which a part of the GB becomes so urbanised, compared with the baseline, that its integrity becomes seriously compromised. We see that the Iver Heath area is at that turning point, even if only assessed in the context of the current proposed expansion in conjunction with that approved in 2014.
  34. The decision maker will scrutinise the claimed VSC. This should include assessing the degree to which they are truly 'Very Special' circumstances when arguments become repeated ones.
  35. Against this backdrop and the relevant planning policies and guidance, we now clarify the specific and extensive harm arising from the development, focusing on the impact on the Green Belt and Colne Valley Regional Park, and its general sustainability in transport terms.

Part 3: Harm, in particular to the Green Belt (with link to CVRP objectives given in italics)

<b>Aspects of Harm</b> <i>(with link to CVRP objectives in italics)</i>	<b>Examples of the Harm</b> and comment
<p><b>A. Additional sprawl</b> of the built-up areas at Pinewood and the nearby settlement of Iver Heath will occur.</p> <p><i>See CVRP Objective 2 under 'C' below</i></p>	<p>As is clear from Map 2 above there will be significant 'sprawl', both as a development on its own, but also when seen in the context of existing 'sprawl' from the settlement of Iver Heath (excluded from the GB) and the extent of the enlarged Pinewood Studios.</p> <p>We highlight in paras 32-39 above the wider planning context and cumulative impact on the GB to be considered. This increases the change and harm to the GB, which becomes proportionately greater with each significant addition.</p>
<p><b>B. The development will represent a significant step towards the merging of towns</b></p> <p><i>See CVRP Objective 2 under 'C' below</i></p>	<p>The application site lies approximately half-way between the edge of London (Uxbridge) and Slough, two large urban areas. Iver Heath and the existing Pinewood Studios (under expansion) already represent an urban break in the GB. This effectively reduces the 'green' space between the 'towns' and development of this site brings their merger markedly closer.</p> <p>The GB is intended specifically to prevent this kind of urbanisation.</p>
<p><b>C. There will be significant encroachment of the countryside</b></p> <p><i>Objective 2: To safeguard existing areas of countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design</i></p>	<p>The size of the development will mean a significant area of countryside to the west of Pinewood Road will be lost. This is of greater importance and concern because of the already approved expansion at Pinewood Studios, now under way.</p> <p>The location next to Black Park, a sub-regionally significant countryside resource, makes this encroachment all the more sensitive.</p> <p>Additional traffic movements associated with the development and road works necessary to accommodate it will be extensive – a major encroachment on already fragile countryside ultimately leading to its greater urbanisation.</p>
<p><b>D. The proposal fails to assist urban regeneration and the recycling of derelict and other urban land</b></p>	<p>The Council/ decision maker will judge the 'need' for the development, and whether alternative sites could adequately meet it. However, it appears to the CVRP that because of the sheer extent of the harm, at least a significant part of the scheme (the visitor attraction) should be seen as 'footloose' capable of being located in an existing urban area where regeneration will be a benefit, and where accessibility by non-car modes of transport could be maximised.</p>
<p><b>E. Failure to promote the beneficial use of the GB</b></p> <p><i>Objective 1: To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</i></p> <p><i>Objective 4: To provide opportunities for</i></p>	<p>We see nothing that materially promotes the beneficial use of the Green Belt/ CVRP, and nothing that addresses the CVRP's objectives. We highlight the:</p> <ul style="list-style-type: none"> <li>- Loss of Peace Path, a long established and very well used route</li> <li>- The proposed replacement will be inconvenient for users from the Pinewood Green area who would be required to take a long diversion along an already busy road (and one yet busier in future)</li> <li>- Walkers and cyclists seeking to reach Black Park would have to pass through a new urban expanse – a huge car park and large buildings. This routing completely fails to protect and enhance Black Park and its environs.</li> </ul>



<p><i>countryside recreation and ensure that facilities are accessible to all.</i></p> <p><i>Objective 5: To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.</i></p> <p><i>Objective 6: To encourage community participation, including volunteering and environmental education. To promote the health and social well-being of benefits that access to high quality green spaces brings.</i></p>	<ul style="list-style-type: none"> <li>- Further severance of already poor links to Black Park along the A412, resulting from the new access proposed and dramatically increased traffic associated with it</li> <li>- No improvements for visitors, especially by active travel modes to Black Park, Langley Park or other nearby locations in the GB</li> <li>- The extent of development, combined with the enlarged Studios complex, will represent a barrier block of building preventing active travel permeability for this area of countryside in the long term</li> <li>- A more urbanised context detracting from the setting of nearby designated heritage assets</li> <li>- Future agricultural use of the site will be prevented. The proposed development would not form part of the rural economy and is inappropriate for a rural location. Please reference Annex 2 which expands on the positive role of agriculture.</li> <li>- All in all not the enhanced countryside experience that should be a feature if this development is to proceed</li> </ul> <p>Security issues are claimed as a reason against permeability but, in view of the importance of GB and CVRP considerations, the scheme should be designed so that attractive active travel routes across the site become integral to the layout design, and security matters dealt with in a sympathetic manner.</p> <p>The scheme needs to be re-designed to address the issues above and provide for walking and cycling routes across the site, set within attractive green infrastructure corridors. We can contribute ideas in that regard.</p>
<p><b>F. No clear evidence of a Net Gain in Biodiversity</b></p> <p><i>Objective 3: To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features.</i></p>	<p>The adverse impact and pressure on nearby areas of high quality biodiversity have not been properly taken into account. This site is an important part of the wider landscape, and sits directly next to Black Park, a particularly sensitive site.</p> <p>Insufficient data has been provided to demonstrate a thorough understanding of the biodiversity credentials of the site and the impact the development would have on sensitive areas nearby. Whilst the applicant claims there will be at least a 10% net gain in biodiversity on site, insufficient information has been provided to justify this assertion.</p>
<p><b>G. A major loss of landscape quality and visual amenity.</b> This is especially in terms of the rural/ countryside setting it provides to Black Park and its approaches. A key test is not the effect of the proposal on the site itself but on the surrounding area.</p> <p><i>Objective 1: To maintain and enhance the landscape, historic environment and</i></p>	<p>There are currently open views across the fields of the site from all angles – from the A412 and from Pinewood Road, but perhaps most significantly from Black Park and the historic Peace Path.</p> <p>The views are of open, agricultural type land, albeit in the latter stages of restoration after mineral workings. There is no immediate context for the huge scale of buildings proposed, and what buildings exist are occasional, small scale and discrete.</p> <p>Landscaping of the site would be incidental to the scale and extent of the proposed development. In the GB it is critical to maintain the experience of not being in an urban area and retain rural character. This would not be the case, and there will be a loss of landscape and visual amenity. Whilst buffers around the edge of the site can be included, they would be insufficient to offset the sense that the site will be developed and the loss of the open landscape.</p>



<p><i>waterscape of the Park in terms of their scenic and conservation value and their overall amenity.</i></p>	<p>The Colne and Crane GI Strategy provides guidelines to maintain open views across fields, together with conservation and management of hedgerows within an agriculturally dominant landscape. This would not be achieved.</p>
<p><b>H. Unsustainability of the location</b> as a place of work and for a visitor attraction, drawing people from a wide catchment, with public transport and active travel options inevitably serving only a small proportion of trips to the site.</p>	<p>This is an inherently unsustainable location, especially for an ‘urban’ visitor attraction. The proposed shuttle bus from Slough Station is a ‘drop in the ocean’ towards sustainable travel.</p> <p>There will not be a network of safe <u>and attractive</u> walking and cycle routes connecting the site with main nearby areas of population e.g. Uxbridge and Slough – or serving the network of smaller settlements in this area.</p> <p>Recreation routes connecting the site with the wider part of the Colne Valley Park it is situated in (for example to the Grand Union Canal to south and to the east) are fragmented at best, and in many places non-existent.</p> <p>It is inevitable there will be a continuing dominance of car-reliant travel and this proposal is not located where it is or can be made sustainable, a key provision in the NPPF.</p>
<p><b>Overall Conclusion on Harm</b></p> <ul style="list-style-type: none"> <li>• The development is inappropriate and causes major harm to the GB and CVRP, and to the purposes of their designation and objectives for their protection and improvement</li> <li>• It will forever change the open, rural character of the area</li> <li>• It will not contribute positively to the beneficial uses of this rural area, and offers no guarantee of biodiversity net gain</li> <li>• It represents unsustainable development, adding a great weight of traffic to this rural area</li> <li>• It forms part of a larger change to this sensitive part of the GB and CVRP, a creeping incursion that has to be stopped if the GB and CVRP is to retain its integrity</li> <li>• This raises an issue of national and regional importance</li> </ul>	

#### Part 4: Comments on Mitigation

36. For the avoidance of doubt the CVRP objects to the principle of this development because of its inappropriateness in the GB and Regional Park and the extent of harm we have outlined.
37. It also considers that even if the decision maker considers there to be a persuasive case for the development the level of mitigation proposed falls well short of what would be needed to outweigh the harm identified and fundamental ‘inappropriateness’ of this large development. This requires a sea change of approach and, until that is rectified, the very special circumstances test should not be considered met.
38. The applicant’s agent, at para 22 of their December 2020 response, dismiss the CVRP’s call for mitigation because they consider the tests of reasonableness for planning obligations not to be met. We disagree and see that the applicant/ agent is taking too narrow a view of the impacts and level of mitigation required.
39. The CVRP’s objection dated October 2020 set out some areas of mitigation, as did correspondents. We summarise below the categories and general scope of mitigation needed, but it is just headlines. We have heeded the tests of mitigation being:
  - a. Necessary to make the development acceptable in planning terms
  - b. Directly related to the development; and
  - c. Fairly and reasonably related in scale and kind to the development
40. The sheer scale of this scheme and its impact on the GB and CVRP means that mitigation must be commensurately significant and extensive.
41. But, before this comes into play and if the scheme is to proceed further, its layout and building design must first be modified to create a ‘greener’, less intrusive, development.

This needs to incorporate excellent permeability across the site to Black Park for walking and cycling, set within generous green infrastructure corridors.

42. The categories and scope set out below have, in part, been informed by the 2019 Colne and Crane Green Infrastructure Strategy – where this applies appropriate letters in Blue are included to cross-reference (found on pages 28-30 of the Strategy).

Area Wide Improvements to promote walking and cycling

- a) A substantial financial contribution (at least £1.75m) to go towards a fund for a programme of improvements to active travel routes that can connect the site and its vicinity with trip origins and destinations across the Green Belt quadrant between the two arms of the Grand Union Canal (south and east), the edge of Slough and the M40 to the north.
- b) We anticipate this to specifically involve improved active travel links to nearby settlements and countryside destinations e.g. Iver Heath/ Pinewood/ Black Park/ Langley Park (with new crossing(s) over the A412) and generally towards Uxbridge/ the Grand Union Canal (both arms)/ Colne Valley Trail/ National Cycle Network (A), Slough and railway stations.

Promotion of and investment in the green environment in the area around the application site

- a. A blend of identified projects and a substantial fund (at least £.75m) to be applied within the area 3km around the site (as the crow flies) and implemented within 10 years of the commencement of the use on the site
- b. Projects to include ones aimed at:
- Landscape improvement
  - Reinstating a productive landscape (Y) in this area, o Farmland and other biodiversity enhancements (S) o Developing links with the education sector (Q)
  - Developing communities and friends groups (P)
  - Providing new and enhanced visitor experiences

Area Wide Management and Maintenance

- c. An annual fund of £25k for 25 years from commencement of the development, to fund a CVRP Countryside Management Service (P, R, X), to care for the area around the site whilst fostering community engagement.
- d. This could link to a 'green team' to add an employment/training angle (Q) and deliver on other objectives eg Biodiversity and link with partner organisations (eg Black Park, Iver Parish). It would assist with the improvement of road corridors to retain and re-create the countryside feel (Z).

Biodiversity Net Gain of at least 10%

- e. Details as agreed with the Council's Ecology Officer

ANNEX 1 Colne Valley Regional Park – Six Objectives

1. To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.

2. To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

## ANNEX 2

### Farming as a key part of the beneficial side of the Green Belt and the CVRP

1. A vibrant agricultural economy is an essential ingredient for underpinning, enhancing and maintaining the Green Belt. It is one of the six key objectives of the CVRP and is particularly important where a green buffer is under direct and intense pressure from urban areas close by.
2. The Pinewood Group's argument appears to be based on a fundamental misunderstanding of the history of the site: it has always been treated and managed as a productive farm since before the gravel extraction. The planning consent for gravel extraction acknowledged and formally recognised the agricultural importance of the land, and clearly stated it must be returned to farming use on completion of the temporary mineral extraction.
3. That planning consent was granted at a time when Pinewood Studios was considerably smaller than it is today and its significant expansion (combined with the latest visitor attraction proposal) represents another step to undermine farming activity in the area.
4. There are numerous examples of enterprising agricultural techniques being used to restore former mineral sites to greater productivity. Agriculture can also underpin other access, biodiversity and landscape objectives. It is a fundamental tenet of Green Belt designation, and is the key part of what keeps the Green Belt green.
5. The Covid-19 pandemic has dramatically altered purchasing patterns, with demand now focused increasingly on local food supply, highlighting the value of a working food landscape. Once this land is gone, it cannot be used to produce food in the future.
6. The continued fragmentation of farmland poses a particular challenge for the CVRP. Speculative developers have escalated farmland values far beyond the means of normal agricultural activity. Loss of agricultural land should be mitigated by investment in other local farmland to secure its future.

(28.10.2020)

The Colne Valley Park CIC exists to maintain and enhance the Colne Valley as the first taste of countryside to the west of London for the benefit of more than three million people who live within 10 miles of the Park. The Park covers an area from Rickmansworth to Staines, across parts of Herts, London, Bucks, Berks and Surrey. The six objectives of the Park are:

1. To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.
2. To safeguard the countryside of the Park from inappropriate development.

Where development is permissible it will encourage the highest possible standards of design.

3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

The Colne Valley Park CIC strongly objects to this application because:

- A. The development is contrary to Green Belt Policy and will harm the Colne Valley Regional Park.
- B. Mitigation relating to the above is inadequate

Colne Valley Regional Park objectives:

We disagree with the assessment on pages 56-58 of the Planning Statement that the application delivers a gain relating to the Colne Valley Regional Park objectives. The Planning Statement completely ignores the effect on the Rural Economy (farming) objective, and underplays impact on the Landscape, Countryside and Recreation objectives. With regard to our Biodiversity objective, we acknowledge the 10% net gain delivered on site, but in our view this does not outweigh the harm caused to the other objectives.

Permissive path from Iver Heath to Black Park:

The existing permissive path is to be lost and a new one provided. However, this is in a location that doesn't connect as many local residents with Black Park as well as the current path, does not improve the connection to public footpath 4 and is in an unattractive urbanised setting through a car park. Our expectation is that a development of this scale should take the opportunity to improve the off-road connections through the site between Iver Heath and Black Park, rather than making them worse. Peace path should be retained in its current location. A better location for new path between Iver Heath and Black Park would be in the green infrastructure corridor around the Lodges and through the centre of the site. This GI corridor should be widened to allow for accommodating the path and habitat connectivity

Black Park:

Black Park is one of the key visitor attractions within the Colne Valley, and its situation within a rural landscape is important. The impact of buildings of up to 21.5m high within 30m of the bridleway on the east of the Park is huge. We find it incredible that this impact is described as being not significant. There will also be additional visitor pressure on the Park. The significant additional light and noise pollution adjacent to Black Park is unacceptable.

Green Belt:

The site is not identified in the Local Plan – neither the existing plan nor the emerging local plan. The development is clearly at odds with the National Planning Policy Framework relating to green belt.

The exceptional circumstances for building on the green belt have not been proven - there is no reason why this visitor attraction needs to be co-located with Pinewood. Whilst there may be an employment argument from a national perspective we are not convinced that that pertains here. This is a high employment area and it seems likely that most of the jobs that will be created will have to be filled by people travelling from outside the area.

This proposal is a further example of the piecemeal development happening in the green belt across the Colne Valley Regional Park. Claiming 'Very Special Circumstances' is becoming a standard approach for large developments seeking to build on the Green Belt. Because of the sheer number of applicants claiming 'Very Special circumstances' for development in the green belt we believe that developers should no longer be able to justify that the circumstances are 'very special'!

#### Sustainable Development:

The project does not deliver well against all three principles of sustainable development. We understand the economic argument, but since this does not directly concern our objectives we make no further comment. The social argument might be made stronger with better active travel. The environmental argument is very weak, with only 9.8ha of on-site green infrastructure – much of which is already present.

#### Mitigation:

We fundamentally oppose this application which we feel is out of all proportion with the site and its surroundings, but in any case the suggested mitigation is woefully inadequate for a development of this exceptional size and impact in the green belt and Colne Valley Regional Park even if it were to be approved.

To address the impact and to help better align the development with the social and environmental pillars of sustainable development we make three broad suggestions:

- 1) Mitigation for the impact on the Colne Valley Regional Park through implementation of the Colne & Crane Green Infrastructure Strategy for the benefit of local residents and visitors to the screen hub. This should be delivered through funding a Countryside Management Service (whole area opportunity X) delivering improvements in the vicinity of the development including whole area opportunities A,P,Q and mid-Colne opportunities MC104, 201, 203, 205, 207
- 2) Mitigation to address the visual, lighting, noise, disturbance impact on Black Park as well as increased visitor numbers
- 3) Uxbridge to Black Park cycle/walking route taking the opportunity, where possible, for attractive off-road routes away from busy A-roads. This would benefit residents of Uxbridge and West London who want to use 'active travel' to visit the proposed screen hub and Black Park. It would also provide a clear benefit for residents of Iver Heath and for Pinewood employees. A feasibility study should be commissioned now

with implementation linking to future planning applications should this outline application be approved. This study should focus on are-wide links as well as local links e.g. opportunity to improve footpath IV4 to encourage walking and/or cycling access for local residents and employees. Buckinghamshire Council and the Colne Valley Regional Park should be involved in the specification for the feasibility study and in reviewing outputs.

We would be happy to engage with the Local Planning Authority or the developer to discuss any of the issues raised.

### **CPRE Bucks**

(18.10.20)

We are writing to object to the above referenced Planning Application, regarding the outline planning permission with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub, including a visitor attraction, an education hub and a business growth hub.

The Buckinghamshire branch of CPRE, the Countryside Charity (CPRE Bucks), as a long standing charity, seeks to protect the countryside from developments that do not meet acceptable planning guidelines.

We would like to register CPRE Bucks' opposition to the above planning application because:

- The land is designated Green Belt and this proposed development is contrary to the NPPF;
- It is also within the Colne Valley Regional Park and would considerably degrade the setting of the Black Park Country Park.

The Land is designated Green Belt

The site is located within the London Metropolitan Green Belt. The National Planning Policy Framework (NPPF, February 2019) says "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"

[Para 133]. The NPPF also says "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." [Para 136] This site is not in the Local Plan, neither the existing plans nor the emerging Local Plan.

The NPPF also says: "Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land." [Para 134]

This proposal clearly breaches the third of these purposes as well as, arguably, the first. This is because, in recent years, the Studios have already expanded massively into the Green

Belt, notably to the east side of Pinewood Road and therefore we consider this is now a large built-up area that is continuing to sprawl into the countryside.

The NPPF also says: “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.” [Paras 143, 144]

The expansion of the Film Studios and introduction of a commercial venture (the Visitor Attraction) do not constitute “very exceptional circumstances”, which case law has demonstrated are very rarely demonstrated. Certainly not here.

And finally, on the subject of the NPPF, it should be noted that the “presumption in favour of sustainable development” does not apply in these circumstances, ie: Green Belt [Para 11 b) i].

The site is within the Colne Valley Regional Park

The Colne Valley Regional Park (CVRP) includes the land where this proposed development is to take place, but it also includes the Black Park Country Park, which is adjacent to the site. CVRP was established in 1965 when the previous generation saw its potential to serve communities of west London and neighbouring counties in providing a valuable escape into the countryside. It has six objectives, which include:

- To safeguard the countryside of the Park from inappropriate development.
- To conserve and enhance biodiversity through the protection and management of species, habitats and geological features in the Park.
- To maintain and enhance the landscape, historic environment and waterscape of the park.
- To provide opportunities for countryside recreation and ensure that facilities are accessible to all.

This proposed development will not meet any of those objectives. Black Park in particular is visited by well over six hundred thousand people per year and this development will inevitably detract from the attractiveness of that environment, certainly to the east side of the park where the development would be clearly visible and will undoubtedly cause noise and pollution from the (presumably) many hundreds of thousands of additional people attending the “visitor attraction”.

The plans for this proposed site clearly show that the proposed buildings would be massive. Not only would the buildings be very large in area, but also very high. Many buildings close to Black Park could be up to 21,5m, which could not possibly be effectively screened by the “landscape buffer” proposed and would also be higher than much of the existing tree line.

Accordingly, for all the reasons we have set out, we would request that the Council refuse this application.

## Neighbouring Authorities

### Royal Borough of Windsor and Maidenhead

(29.11.21 comments below, original comments 27.11.20 also raised no objection)  
I write to inform you that the Royal Borough of Windsor and Maidenhead has no objection to the above proposal.

### Slough

(16.12.20)

Please see below an overview of my comments regarding air quality impact for Slough. I was informed by our planning case officer that there will be a resubmission of the assessment once at the detailed design stage, where we will have another opportunity to provide comments, however I thought you may find these comments useful at this stage.

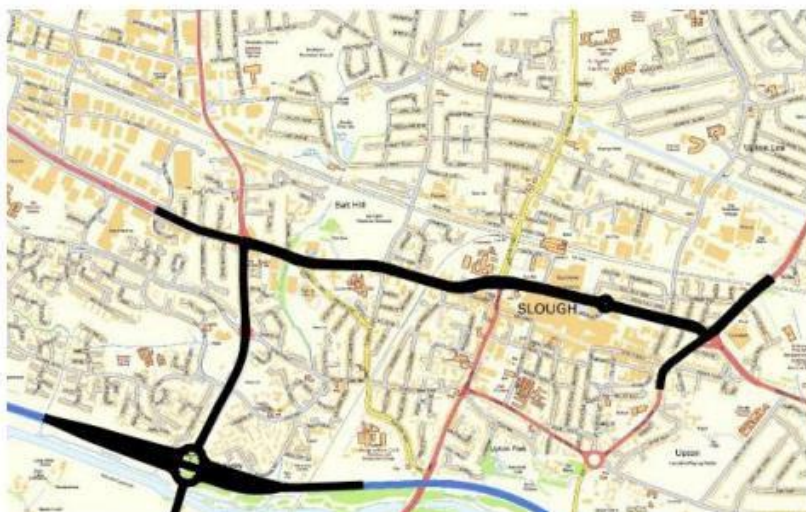
Air Quality Comments:

The proposal includes provision of 2,341 car parking spaces spread across the different site uses (visitors, education centre etc) and 269 cycle parking spaces.

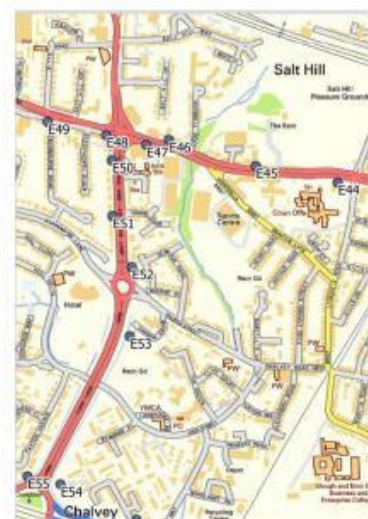
The AQ assessment has a section which identifies impacts in the Slough study area (roads marked in black on map below).

Study Area:

Receptors in Slough Study Area:



Identified



Within the construction phase chapter, 110 LDV and 70 HDV trips per day are expected to impact Iver's AQMA 2. The construction traffic vehicle routing is not included in the AQ



assessment so it is not clear if impacts will be experienced at Brands Hill. The study area for Iver suggests the main route of traffic will be using Junction 1 of the M40 so we would look to request a condition that no construction traffic accesses the site via Brands Hill.

During the operational phase, the biggest increase of NO<sub>2</sub> identified in Slough is at E40 and E41 (Wellington St), increasing by 0.4ug/m<sup>3</sup> in 2020 do something compared to the do nothing scenario. Increases in PM<sub>2.5</sub> and PM<sub>10</sub> are minimal. The model is based on 2020 - due to the impact from Covid-19, it has been assumed that no background traffic growth occurred between 2019 and 2020.

To mitigate against air quality impacts, the developer proposes to implement a travel plan to reduce vehicle impacts, including:

- ☑ EV charging – 5% of all parking spaces will be provided with fast electric vehicle charging points (i.e. active provision), with a further 5% of spaces provided with appropriate infrastructure to allow charging points to be implemented if the demand is necessary (i.e. passive provision). This is supported.
- ☑ Free shuttle bus for visitors to the proposed scheme studios.
- ☑ Provision of new bus service from Slough rail station to site. It is Slough's preference that this is an electric bus.

Once at the detailed design stage, we request that a meeting is set up between South Bucks and Slough Borough Council, to discuss impacts and mitigation.

## **Hillingdon**

(22.01.21 official response pasted below, additional information/correspondence dated 26.01.21, 13.01.21 and 14.01.21)

Thank you for your consultation received on 9 October 2020. The London Borough of Hillingdon objects to the proposal for the following reasons:-

The London Borough of Hillingdon objects to the application which is an inappropriate development within a large area of the Green Belt requiring very special circumstances to be robustly justified. There is insufficient information demonstrating the proposal would not result in an adverse impact on the local highway network. It is requested that a decision is not made on the application under ref: PL/20/3280/OA until further detail is provided in respect of highways impact and the London Borough of Hillingdon is consulted on the additional information provided.

## OTHER REPRESENTATIONS:

First round of consultation. Representations included approximately 214 objections and 185 letters in support.

The grounds of support are summarised below:

- Educational, cultural and social benefits for the local community, those working at and visiting the studios as well as the wider film and TV industry
- Screen hub UK estimated £450m investment for the UK film and television industry
- Covid-19 economic recovery nationally, for Bucks and locally in the Ivers
- Pinewood bring in big productions and overseas money. This is beneficial in a time of economic uncertainty
- Global reputation of Pinewood studios as a film industry leader and of Britain in this market
- Will help to address unemployment caused by Covid-19 and benefit local community
- Support the Buckinghamshire LEP Local Industrial Strategy and its Economic Recovery Plan
- Opportunity to celebrate the crews, the storytellers and the creative industries that are a global economic and cultural success for the UK
- Valuable social investment for the UK film and TV industry
- Investment will secure the future of Pinewood Studios
- Combination of business, education, attraction supports apprenticeships and reskilling opportunities
- Development of individual and business and their skills, contributing to screen economy
- Pinewood essential to success of many SME companies
- The Creative Industries can play a leading role in helping us to build back better and therefore continue to be committed to the support and development of the Creative Industries as set out in the Industrial Strategy Creative Industries Sector Deal
- A further expansion of Pinewood Studios would bring substantial economic benefits and an opportunity to link with both the Experience ('Live Pinewood') as well as 'Centre Stage' which will bring practical, transferrable experience
- Job creation: 3,500, including over 1,500 during construction.
- Proposals could add approximately £230m pa to the economy and an additional tourism spend of £125m pa
- Over 500 apprenticeships and reskilling opportunities over next 5 years
- Growth hub supporting start ups and incubation function for people and companies to serve the film industry
- Further Pinewood expansion would bring substantial economic benefits and an opportunity to link the visitor attraction with centre stage
- The proposal will support more community and school engagement with the film industry
- Partnership with National Film and Television School of further benefit
- Provision of opportunities in the industry for those that need them most
- Wouldn't usually support development of Green Belt land but consider the landscape strategy well put together and supportive of biodiversity

- Pinewood support and benefit the local community
- Visitor attraction to be in the top 10 in the UK – substantial positive impact on tourism and hospitality sector
- Transition to film tourism sector should be supported The Pinewood Studios Experience would play a vital part in the rebuilding of the regional economy post COVID-19 and due to Brexit, having the potential to become a valuable and popular year-round attraction for domestic and international visitors. Raising the profile of the region, the project could increase visitor engagement, encouraging spend across the wider region, and play an important part to kick start the national visitor economy
- Ability to educate visitors about the heritage and Pinewood's history as the UK's oldest film studio
- Welcome attraction to celebrate Pinewood's heritage and legacy, synonymous with some of the most iconic and memorable films ever made. From The Red Shoes, Superman, James Bond and Star Wars it is filled with film heritage that even Hollywood can't rival
- Granting of permission would encourage the development of the area into a sought after area to work and live
- Good use of land
- Development of green campus
- Opportunities for improved infrastructure should be insisted on and embraced particularly in relation to traffic and road infrastructure

The grounds of objection are summarised below:

#### **Harm to character and design**

- Harmful impact on semi-rural character of surrounding area. The Ivers is experiencing development pressure from the South and East.
- Iver Heath is being engulfed by further development including the continued expansion Pinewood Studios.
- Area becoming a less attractive place to live.
- Loss of peacefulness due to daily 6500 visits to attraction.
- Industrial appearance of existing Pinewood complex - Pinewood East warehouses are large industrial units, harmful visually and proposed development will result of more of the same
- Change of village character with countryside to urban/industrialised waste land/estate
- A large and prominent entrance is unacceptable and completely out of character with the houses and fields on the Pinewood Road.
- Extensive and highly visible surface level car parking
- Merging of Villages of Iver Heath and Fulmer.
- Poor design
- Overdevelopment
- Detriment to historic assets
- Contrary to development plan
- Concern the Ivers will become an urbanised extension of Slough or Greater London
- Contrary to Colne Valley Regional Park Objectives
- Loss of farmland

### **Green Belt**

- Contrary to purposes of the Green Belt
- Contrary to national and local policy
- Green Belt should be protected
- Destruction of Green Belt
- Lack of justification for location of the proposed visitor attraction in this location. More appropriate on a brownfield site.
- Harm to the openness of the Green Belt
- Green Belt land already lost to recent Pinewood expansion
- The quarry works being undertaken on this land required that the site be returned to agricultural use.

### **Neighbour/Local Amenity**

- Loss of view
- Impact on neighbouring amenity due to industrial scale of studios buildings
- Lack of consideration of the impacts on local residents. Lack of mitigation of impacts
- Use of Black Park for commercial filming already diminishes enjoyment of the park
- Black Park ruined by having development built alongside
- Overshadowing, overbearing, loss of privacy, interference with neighbouring properties
- Existing light pollution associated with night time filming and security lighting at Pinewood
- Lighting should be low level
- Insufficient infrastructure in the area to support the proposed development
- Lengthy opening Hours of attraction, 7 days a week. Disturbance. Opening hours not made explicitly clear.
- Local residents enjoy respite from Pinewood and associated activities/traffic implications at the weekend and this will no longer be the case
- Iver Heath overcrowded with additional visitors
- No consideration for existing residents
- Physical and mental health impact

### **Highways**

- Traffic impacts: congestion, increased traffic and infrastructure
- Traffic improvement works will not lessen the inconvenience of existing residents.
- 40% increase in traffic
- Five Points roundabout cannot cope with increased traffic
- Robust traffic management plan required to prevent visitor attraction traffic from using 5 Points Roundabout at this would impact local traffic and amenities
- Rattrunning through areas of Pinewood Green to A412 and onto M25. Road should be closed off as it was historically, danger, disturbance, high speeds, sat navs
- Pinewood Green should be closed to through traffic
- Access and egress into the site and the potential for congestion on the road network
- Congestion on A412.
- Proximity of main access to crash site
- Road quality of Pinewood Green poor.

- Pinewood Green residents have to time when to leave their properties due to the traffic situation
- Pinewood Road needs to be widened as the size of vehicles using the road do not fit onto one side
- Traffic and safety concerns
- Despite the provision of a shuttle bus service from Slough the majority of visitors will want to drive to the site, as indicated by the 2,341 car parking spaces proposed.
- Baseline for assessment does not include additional increase in traffic relating to the east expansion
- No adequate link from local train stations.
- Unsustainable location - Mode share targets low, if Pinewood is looking to be more sustainable need a more ambitious target is needed and a greater number of electric charging points should be provided.
- Poorly configured local roads
- Signage has not deterred existing traffic from using unsuitable routes
- Poor road maintenance in local area
- Currently Pinewood employees park within nearby residential roads
- Staff Parking - Parking of Pinewood employees within nearby residential roads as need to pay to park in the site car park (in association with visitor attraction)
- There are inadequate speed calming systems currently in place and road signage is poor.
- Impacts on Sevenhills Road: Increased traffic on Seven Hills Road and Seven Hills Road should only be used for resident and business access
- HGV and construction damage to local roads
- Contrary to policy to reduce the number of HGVs in the Ivers
- Congestion in area has already resulted in rerouting of the bus route resulting in inconvenience to residents.
- Since the expansion of the studios traffic in the area has become problematic.
- Pinewood employees use of local roads inconsiderate
- Traffic is already difficult getting through Iver Heath during the hours of 7.30am - 9am and 4pm - 6pm.
- When the M25 has problems everyone comes off at Denham and then uses Iver Heath which then brings everything to a stand still.
- Commuters station parking on local roads exacerbated
- Parking along the A412 dual carriageway is already dangerous and over crowded (partly thanks to the misguided parking charges of the country parks and their horrible commercialisation)
- Potential for attraction visitors to park on local roads and the need for parking management schemes (e.g permits) which will inconvenience local residents
- Insufficient parking proposed to serve the proposed development
- Urbanising improvements to Five Points roundabout not wanted
- Cycling has not been sufficiently considered and addressed
- Emergency service access
- No proposals for the diversion of traffic to the M4
- the 5 points roundabout is a historic landmark, which is close to people's hearts, we do not want it concreted over.
- Effect on Iver Heath infant school entrance on Slough Road – danger

- Shuttle bus routes to Gerrards Cross inaccurate and misleading (due to route via ford)
- Conflict with use of Petrol Station on Uxbridge Road (the only one in the area) due to queuing
- What improvements can be made to Church Road due to increase in traffic
- Parking should be off site – park and ride

### **Environmental Concerns**

- Unknown damage to water course.
- Environmental and wildlife impacts.
- Detrimental impact on Black Park wildlife and other parks
- Land waste water discharge into Black Park
- The ecological impact of such a huge development on the fields and local wildlife together
- Concern regarding night-time filming activities and associated lighting. Detrimental impact on Black Park wildlife.
- Existing light pollution associated with Pinewood
- Loss/damage to trees
- Air quality Impact: /Fumes poor/worsening and exceed legal threshold
- The Ivers is an AQMA and targets are already not met- proven that the junction of Pinewood Green and Pinewood Road is one of the highest in the area for pollution.
- Health concerns exacerbated –Asthma
- Smell
- Flooding in local area - concern re development hard landscaping. Severe flooding around the north side of Pinewood Studios since expansion. The water table has risen and is rising. Potential to flood homes.
- Associated noise and light impacts
- The additional usage of services (water, sewage, electricity etc.) has not been taken into account.
- Level of ecological survey submitted unsatisfactory
- The SSSI in Black Park is a valuable local resource that requires protection
- The site lies within a Biodiversity Opportunity Area
- Climate change – no estimated carbon footprint is detailed and Pinewood should be held to account for environmental impacts
- Design information relating to climate friendly initiatives limited e.g green roofs
- Shuttle busses should be environmentally friendly

### **Peace Path**

- Concern re loss of the Peace Path and location of alternative provision not identified.
- Removal of the current linkpath is also unacceptable. This is used by a significant number of local residents as it is in a very good location to access for many residents
- Really important connection – it would be hugely disappointing and upsetting if the access path is taken away. The development will act as a barrier to accessing Black Park.
- The little path which leads to the Black Park will disappear, therefore we will have to go all the way through the other entrance, which have inappropriate road layout for buggy or kids bikes and is not safe for walking!
- Harm to quality of life and health

- Alternatives routes should be assessed and a study published, including consultation with the local community
- No defined solution put forward.

### **Local employment**

- Experience of Pinewood approach to jobs for local people questionable, not delivered as promised has not met expectations.
- Explanation of where creative industry jobs promised in the last expansion went welcomed
- Pinewood claim to be creating jobs, yet they threw out many of their renters from the main site because of the Disney deal, thereby effectively reducing jobs.
- Job creation associated with attraction does not justify the detrimental harm to the local area
- Disney Deal, loss of jobs due to loss of renters from main site
- Employment forecasts not credible given current pandemic

### **Other**

- Profit driven – purchase of low cost Green Belt then pursuing change of use to generate value. Private equity style ownership with complete disregard for anything other than financial return.
- Greed of Pinewood Studios should not be pandered to
- Local and national authorities ignoring community wishes
- No exceptional circumstances
- Residents on Sevenhills Road not made aware of this application.
- Not all residents in St David's Close Iver Heath have received a neighbour notification letter. Neighbour notification letter not received.
- Pinewood has land in Denham which would be more appropriate to use and within closer proximity to the motorway.
- Why can't an alternative site be considered for the Visitor attraction 'they say the Visitors' Attraction needs to be adjacent to Pinewood Studios in order for visitors to receive the "Pinewood experience". Is this really a valid reasons for the destruction of our community and the quality of residents' lives?' A rationale for locating the visitor attraction should be provided and consulted on prior to determination
- Reference should be made to the conclusions of the secretary of state and if this is applicable
- To avoid Green Belt harm development should be located underground
- Concerns relating to Sevenhills Road consent and associated mitigation.
- The National Film and Television school has been granted funds for expansion, questions the appropriateness of an education hub in proximity. A joint venture might be a positive solution.
- House prices negatively affected
- Alderbourne farm more suitable location
- Brown field site nearer to transport hubs more suitable
- Absence of local benefit
- Harm to health and wellbeing
- Construction disturbance – should be limited to daylight and no weekend working

- Local residents should be compensated for works to properties required to mitigate environmental impacts
- Section 106 monies must be ringfenced to benefit the geographical areas directly affected
- Not necessary for the proposed attraction to be located within proximity of Pinewood
- Previous infrastructure improvements in the local area have not transpired
- Increased litter problem
- Cumulative construction and development impacts in the local area due to major initiatives including: Cross Rail, HS2 and Heathrow expansion.
- Negatives voiced by locals relating to previous expansion experienced rather than the benefits presented by Pinewood.
- Contrary to emerging neighbourhood plan -this area is Green Belt, the neighbourhood plan showed Pinewood Road as the final boundary of development in Iver Heath.
- Council should expect a significant number of compensation claims
- What compensation is to be offered to local residents
- Increase in crime in local area
- The withdrawn Local Plan identifies housing to be built on the eastern side of Pinewood Road 'Will this additional development cause even more traffic chaos or will it force the erection of houses on other inappropriate areas in Iver Heath?'
- Increases likelihood of development coming forward on the opposite side of Pinewood Road
- Development of land on the opposite side of Pinewood Road should not go ahead and this should be supported by Pinewood.
- Concern relating to preparation works on site
- Concern that the proposed development has already been approved
- Lack of stakeholder engagement pre submission – bid to secure fast track approval without proper engagement with local residents and stakeholders. A considered and open dialogue with Pinewood Studios and the local community would be welcomed. Engagement compromised by Covid-19 and online events not properly advertised. Face to face engagement essential to allow all views to be considered.
- Concerns 'Visitor Attraction' similar to a Theme Park
- Waste/ fly-tipping in local area
- Visibility of Pinewood from motorway
- Comments supporting the application not from those who live in the area
- Cllrs should tour the local road network before making a decision
- Residential properties have to adhere to strict Green Belt rules – double standard
- Unsure of accuracy of assessment due to Covid situation
- Public consultation time insufficient given volume of information submitted. This should be extended
- BNG report cannot be found in the documentation
- Surrounding Green Belt should be protected prior to application determination
- How many other local pieces of land has Pinewood acquired/taken an option on – their ambitions for further expansion are unknown.
- Difficulty commenting as Council website down
- Pinewood should leave a lasting legacy for the residents of Iver Heath



- The Council should request Pinewood submit two separate applications – one for the studios and one for the visitor attraction
- Believe the Council was aware of this application when permission was granted for the Sevenhills Road upgrade
- Lack of regard of Council have for local residents
- Servicing and deliveries to site out of hours
- Notices poorly displayed on lampposts – hard to read
- Human rights compromised

33 further objections and 2 comments of support were received in relation to the second round of consultation:

Additional concerns raised summarised as follows:

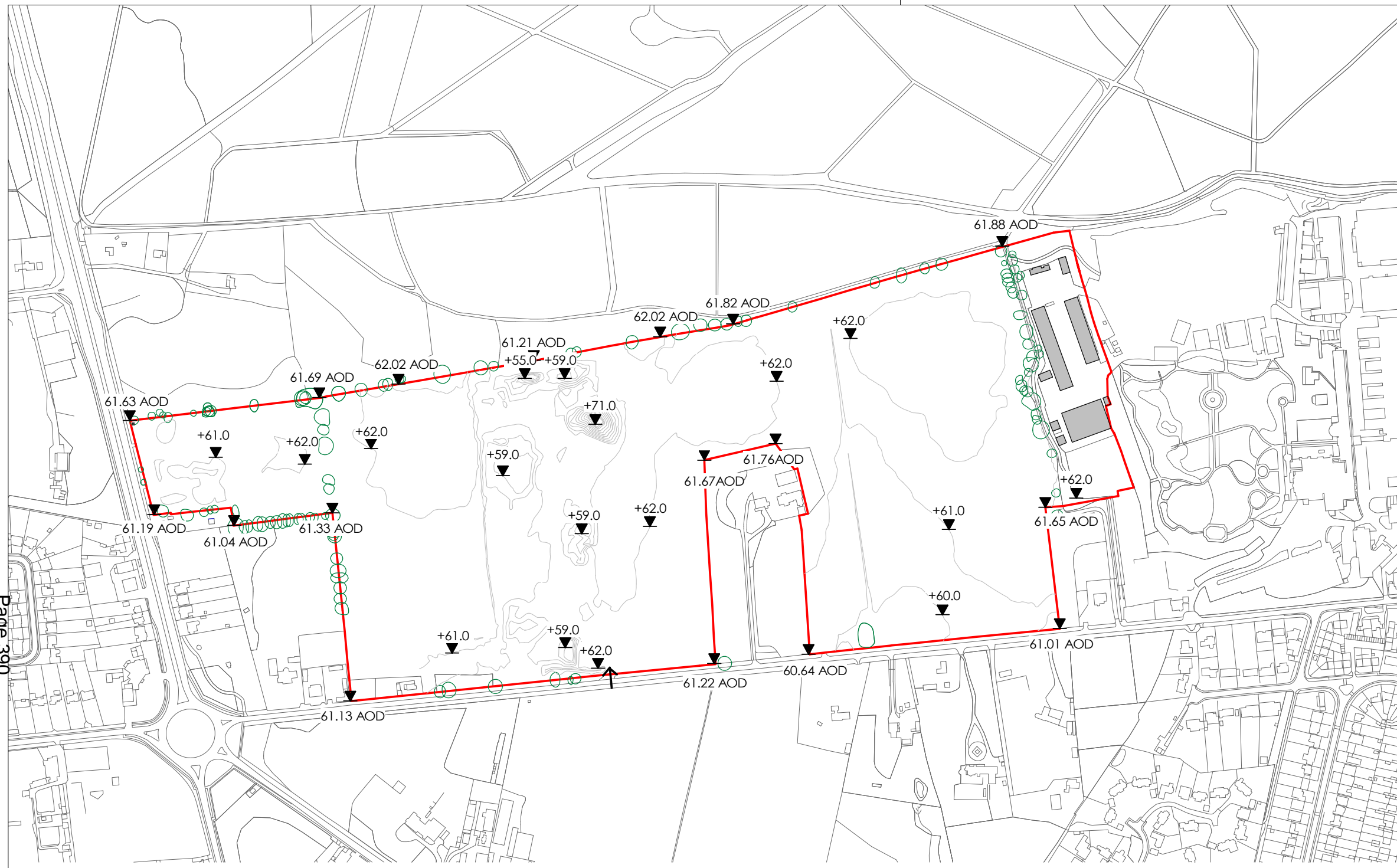
- Increase in ‘temporary buildings’ on Pinewood estates which seem to be permanent in use
- Leasing of proposed buildings/workshops to supporting industries contributes to disturbance in locality with the benefit being to external customers
- Potential impact on bat flying routes resulting from their commuting corridors being cut off. Surveys may not mitigate harm
- The application presents a range of mitigations in relation to the bat colonies. These are also not validated as effective by an independent expert
- Alternative to Five Points Roundabout scheme - suggest that Pinewood Studios opens up an entrance from Seven Hills Road leading to and from the M40 which is where the majority of the traffic is trying to get to and from
- Existing Pinewood employees concerned by lack of on site parking
- More than sixty documents - many of seemingly material consequence and totalling hundreds of pages - have recently been added to the Planning Portal for this application. It is totally unreasonable for residents to fully digest these within the timeframes. The deadline should be extended by at least one month, or more if new documents keep being added as they are now. Question the validity of the planning process which appears to be skewed in favour of the applicant
- ES Addendum does not address issues raised by Temple review relating to climate change and greenhouse gases, air quality and protected species
- Amendments to the application do not address fundamental issues: traffic, noise and air pollution and adverse impact on quality of life for residents
- Process for comment does seem skewed in favour of SHUK, whereby they have continued to add significant documents during the consultation period, making it incredibly challenging and time consuming for residents to provide a fully informed response in the time given
- Proposed closure of Peace Road - this footpath existed before the Pinewood Studios claimed to open it. It was always there, they illegally closed it in the first place. Local residents use this footpath all the time. It must stay open
- The developer should assess more alternatives to the "Peace Path" and publish them, including consultation with local residents, prior to a final decision on the application. Safety concern not considered relating to safe crossing to access new peace path

- Developer refuses to accept that proposal could be viewed negatively or is a worsening of provision. Extended length of route undesirable
- Five points roundabout application PL/21/4074/FA recently submitted and makes no reference to SHUK despite being intrinsically linked
- The application and / or supporting statements make numerous claims about the economic value added by the creative industry. Little is specific about this particular development. The claims put forward regarding benefit are not substantiated by independent expert analysis
- Fires at Black Park and Pinewood Studios and lack of emergency access due to traffic
- Environmental damage and Green Belt destruction should be viewed particularly critically in light of COP 26 outcomes.
- Phase 3 sound stages have not yet commenced construction – example of continued development at the Studios and ongoing disturbance to residential amenity over past 10 years+
- No mention is made of High Pressure Fuel Pipelines that run down the boundary of Black Park 30mtr inside land on the Pinewood Studio side and under the land for the Experience and West complex – have the relevant safety considerations and guidance been considered.

**APPENDIX B: Parameter Plans**

- PP1A and B Site Context Plan 3770-FB-XX-00-DR-A-01-120 Rev P1 and 3770-FB-XX-00-DR-A-01-121
- PP2 Development Zones 3770-FB-XX-00-DR-A-01-122 Rev P2
- PP3A and B Land Use 3770-FB-XX-00-DR-A-01-123 Rev P3 and 3770-FB-XX-00-DR-A-01-124 Rev P3
- PP4 Green Infrastructure 3770-FB-XX-00-DR-A-01-125 Rev P3
- PP5 – Access and Movement 3770-FB-XX-00-DR-A-01-126 Rev P1
- PP6A and B Building Heights 3770-FB-XX-00-DR-A-01-127 Rev P2 and 3770-FB-XX-00-DR-A-01-128
- PP7 Development Numbers and Yield 3770-FB-XX-00-SC-A-01-000 Rev P3

Notes:  
 Source – topographic survey August 2020  
 Part of the site is still under restoration from quarrying. In these locations, the parameters will be taken from the final restored levels, rather than those shown on the topographic survey. In areas where restoration is still to be completed, the levels will be representative of those shown for the areas that have already been restored (typically ranging from 60 to 62 m AOD)



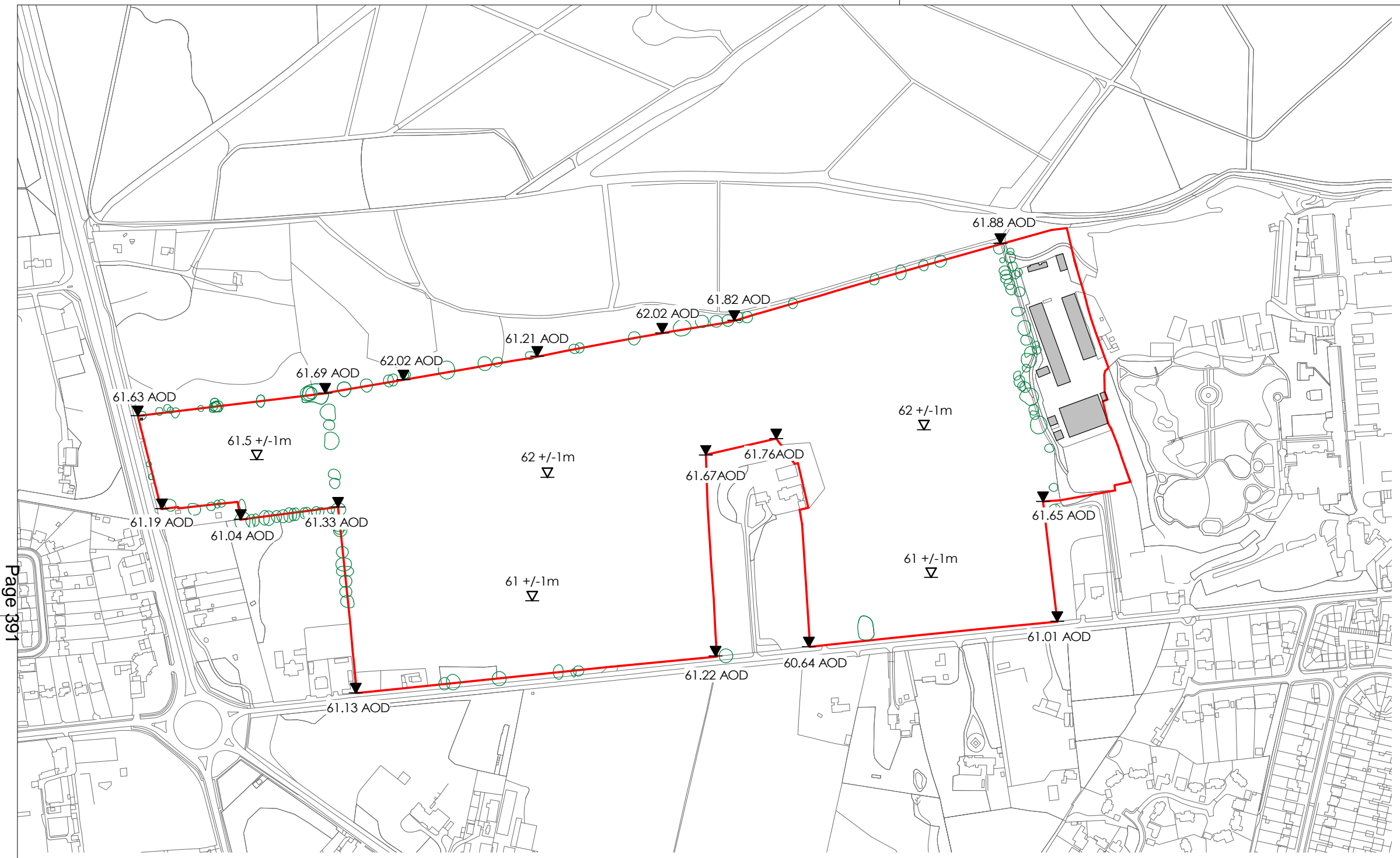
Page 390

DIAGRAM KEY:

	APPLICATION BOUNDARY		EXISTING RETAINED STRUCTURES
	CONTOURS (1m intervals)		EXISTING VEHICULAR ACCESS
	EXISTING TREES		EXISTING SPOT LEVELS








Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status: <b>PLANNING</b>	Suitability:	Drawing No: <b>3770-FB-XX-00-DR-A-01-120</b>	Rev: <b>P1</b>
					Job Title: Screen Hub UK, Pinewood Studios	Job No: 3770	© Drawing & Design Copyright of:	
					Drawing Title: PP1A Site context (current levels)		<b>FAULKNERBROWNS ARCHITECTS</b> 	
					Date: 30/09/20	Scale: 1 : 5000	Drawn By: RM	Checked By: CE
							FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW T+44(0)191 2683007 F+44(0)191 2478132	



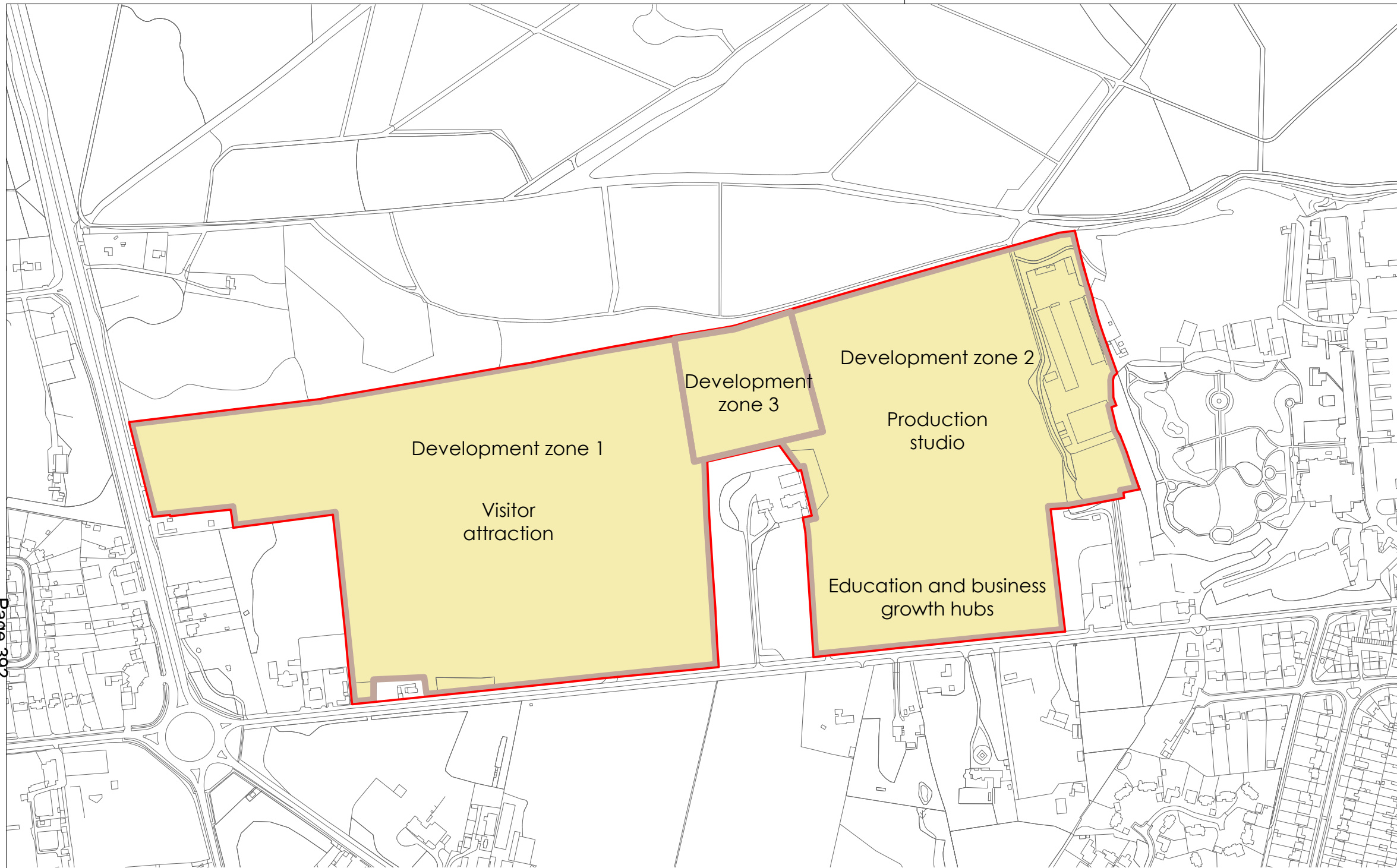
Page 391

DIAGRAM KEY:

 APPLICATION BOUNDARY	 PROPOSED LEVELS
 EXISTING TREES	 EXISTING LEVELS FROM TOPOGRAPHIC SURVEY

Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status: <b>PLANNING</b>	Suitability:	Drawing No: <b>3770-FB-XX-00-DR-A-01-121</b>	Rev: <b>P1</b>
					Job Title: Screen Hub UK, Pinewood Studios	Job No: 3770	© Drawing & Design Copyright of:	
					Drawing Title: PP1B Site context (proposed levels)		<b>FAULKNERBROWNS ARCHITECTS</b> 	
					Date: 30/09/20	Scale: 1 : 5000	Drawn By: RM	Checked By: CE
							FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW T+44(0)191 2683007 F+44(0)191 2478132	





Notes:

Three principal development zones are identified:

- 1) Visitor attraction - a bespoke film-inspired leisure/tourism facility incorporating exhibition space, related and ancillary food & drink, retail and guest facilities (internal and external)
- 2) Production studio - a film and media production hub including sound stages, workshops, backlot and offices of similar form to the facilities on the adjacent Pinewood studios estate
- 3) Shared/joint zone - a flexible use area for either visitor attraction or production studios or joint use.

The site also makes provision for:

- a) Education hub - building(s) in which film and media related education support and outreach is provided across multiple age ranges
- b) Business growth hub – building(s) in which screen and media related start-up, incubator and commercial floorspace is provided together with wider business support facilities

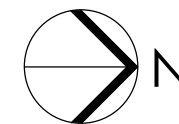
The form and extent of development within in each zone is set out in PP7

Page 392

DIAGRAM KEY:

- APPLICATION BOUNDARY
- EXTENT OF DEVELOPMENT ZONES

0m 50 100 200 300 500m



Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Suitability:	Drawing No:	Rev:
P2	07.10.21	DEVELOPMENT ZONE 3 ADDED	RM	CE	<b>PLANNING</b>		3770-FB-XX-00-DR-A-01-122	P2
					Job Title:	Job No:	© Drawing & Design Copyright of:	
					Screen Hub UK, Pinewood Studios	3770	<b>FAULKNERBROWNS ARCHITECTS</b>	
					Drawing Title:	FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW		
					PP2 Development zones			
					Date:	Scale:	Drawn By:	Checked By:
					30/09/20	1 : 5000	RM	CE
					T+44(0)191 2683007 F+44(0)191 2478132			



**Notes:**

The land use parameters comprise buildings, movement (including access, parking and servicing) and green infrastructure.

There are two different options (A and B), which show alternative locations / orientation of the visitor attraction.

A) The visitor attraction will comprise one or more individual or interconnected main buildings (up to 10), together with smaller scale structures to accommodate related support / service facilities. The limit on the total number of main buildings will be flexibly applied in agreement with the local planning authority when determining reserved matters.

B) The production studio and backlot will be a series of buildings of different forms as required by the needs of film production.

C) Zone C will be used flexibly to accommodate buildings for either the visitor attraction or production studios or joint use.

The Education and Business Growth Hubs will be one or more individual or interconnected buildings (up to 5 main structures) sited within the movement zone adjacent to Pinewood Road.

**DIAGRAM KEY:**

- APPLICATION BOUNDARY
- BUILDINGS
- GREEN INFRASTRUCTURE
- MOVEMENT ZONES
- \* EDUCATION AND BUSINESS GROWTH HUBS
- SECONDARY GREEN INFRASTRUCTURE

Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Suitability:	Drawing No:	Rev:	
P2	30.09.21	AMENDMENTS TO EXTENT OF GREEN INFRASTRUCTURE TO ACCOMMODATE ADDITIONAL ECOLOGICAL MITIGATION	RM	CE	<b>PLANNING</b>		<b>3770-FB-XX-00-DR-A-01-123</b>	<b>P3</b>	
P3	07.10.21	ZONE C. ADDED GREEN INFRASTRUCTURE AMENDED TO ACCOMMODATE ZONE C.	RM	CE	Job Title: Screen Hub UK, Pinewood Studios	Job No: 3770	© Drawing & Design Copyright of:		
					Drawing Title: PP3A Land use		<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <p><b>FAULKNERBROWNS ARCHITECTS</b></p> </div> <div style="font-size: 0.8em;"> <p>FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW</p> <p>T+44(0)191 2683007 F+44(0)191 2478132</p> </div> </div>		
		Date: 30/09/20	Scale: 1 : 5000		Drawn By: RM	Checked By: CE			





**Notes:**

The land use parameters comprise buildings, movement (including access, parking and servicing) and green infrastructure.

There are two different options (A and B), which show alternative locations / orientation of the visitor attraction.

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C) Zone C will be used flexibly to accommodate buildings for either the visitor attraction or production studios or joint use.

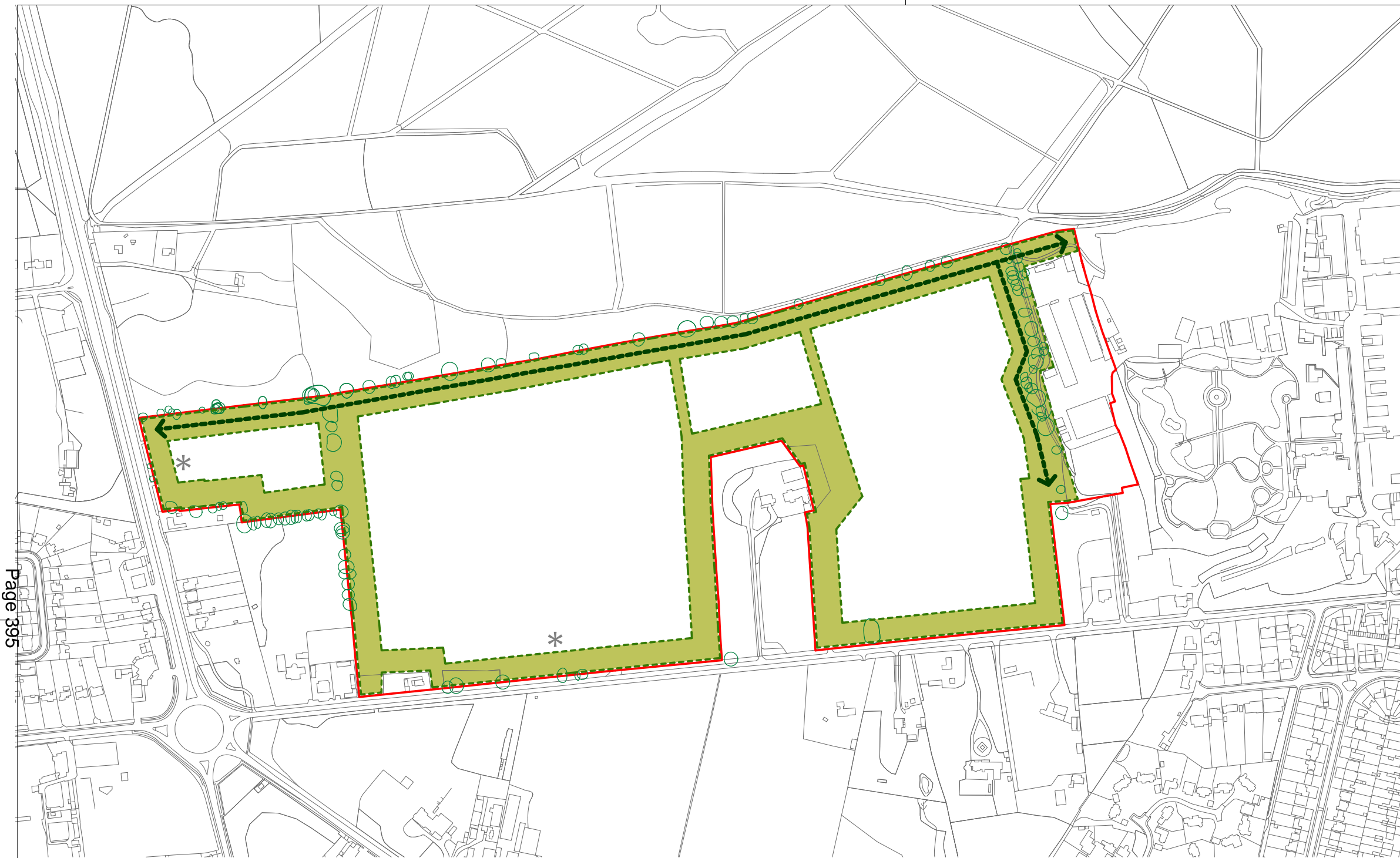
The Education and Business Growth Hubs will be one or more individual or interconnected buildings (up to 5 main structures) sited within the movement zone adjacent to Pinewood Road.

**DIAGRAM KEY:**

- APPLICATION BOUNDARY
- BUILDINGS
- MOVEMENT ZONES
- \* EDUCATION AND BUSINESS GROWTH HUBS
- GREEN INFRASTRUCTURE
- SECONDARY GREEN INFRASTRUCTURE

Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Suitability:	Drawing No:	Rev:
P2	30.09.21	AMENDMENTS TO EXTENT OF GREEN INFRASTRUCTURE TO ACCOMMODATE ADDITIONAL ECOLOGICAL MITIGATION	RM	CE	<b>PLANNING</b>		<b>3770-FB-XX-00-DR-A-01-124</b>	<b>P3</b>
P3	07.10.21	ZONE C. ADDED GREEN INFRASTRUCTURE AMENDED TO ACCOMMODATE ZONE C.	RM	CE	Job Title: Screen Hub UK, Pinewood Studios	Job No: 3770	© Drawing & Design Copyright of:	
					Drawing Title: PP3B Land use		<b>FAULKNERBROWNS ARCHITECTS</b> 	
		Date: 30/09/20	Scale: 1 : 5000	Drawn By: RM	Checked By: CE	FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW T+44(0)191 2683007 F+44(0)191 2478132		





**Notes:**

The development will support the delivery of a 10% minimum biodiversity net gain through green infrastructure provision. This will include a comprehensive landscape and ecological enhancement scheme for the application site

The total area of green infrastructure within the application site will be no less than 9.8 ha.

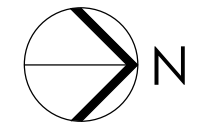
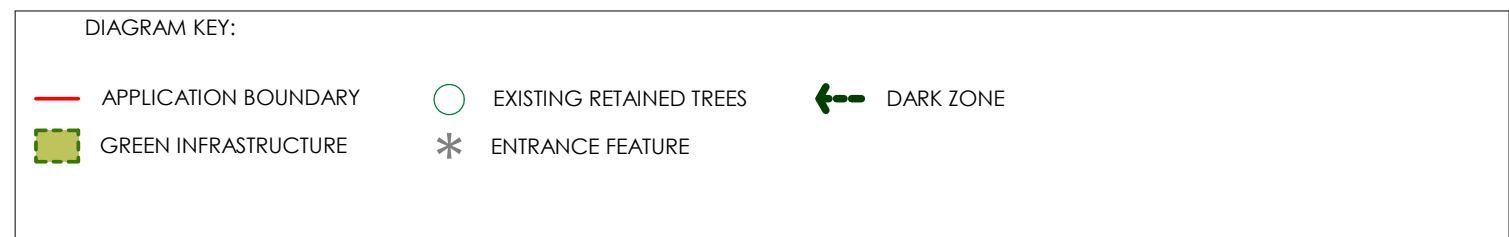
The green infrastructure will include boundary treatments and stand offs; protection of existing key landscape features / assets; provision of new / enhanced landscape and ecology; a strengthened landscape frontage to Pinewood Road.

The boundary provision will be generally 25m to 30m in depth (other than areas adjacent to points of access) subject to detailed design and approval under reserved matters, with a substantive landscaped edge to Black Park (30m in depth) and appropriate landscaping provision where building zones are close to adjacent residential properties (typically a 15m depth of woodland planting)

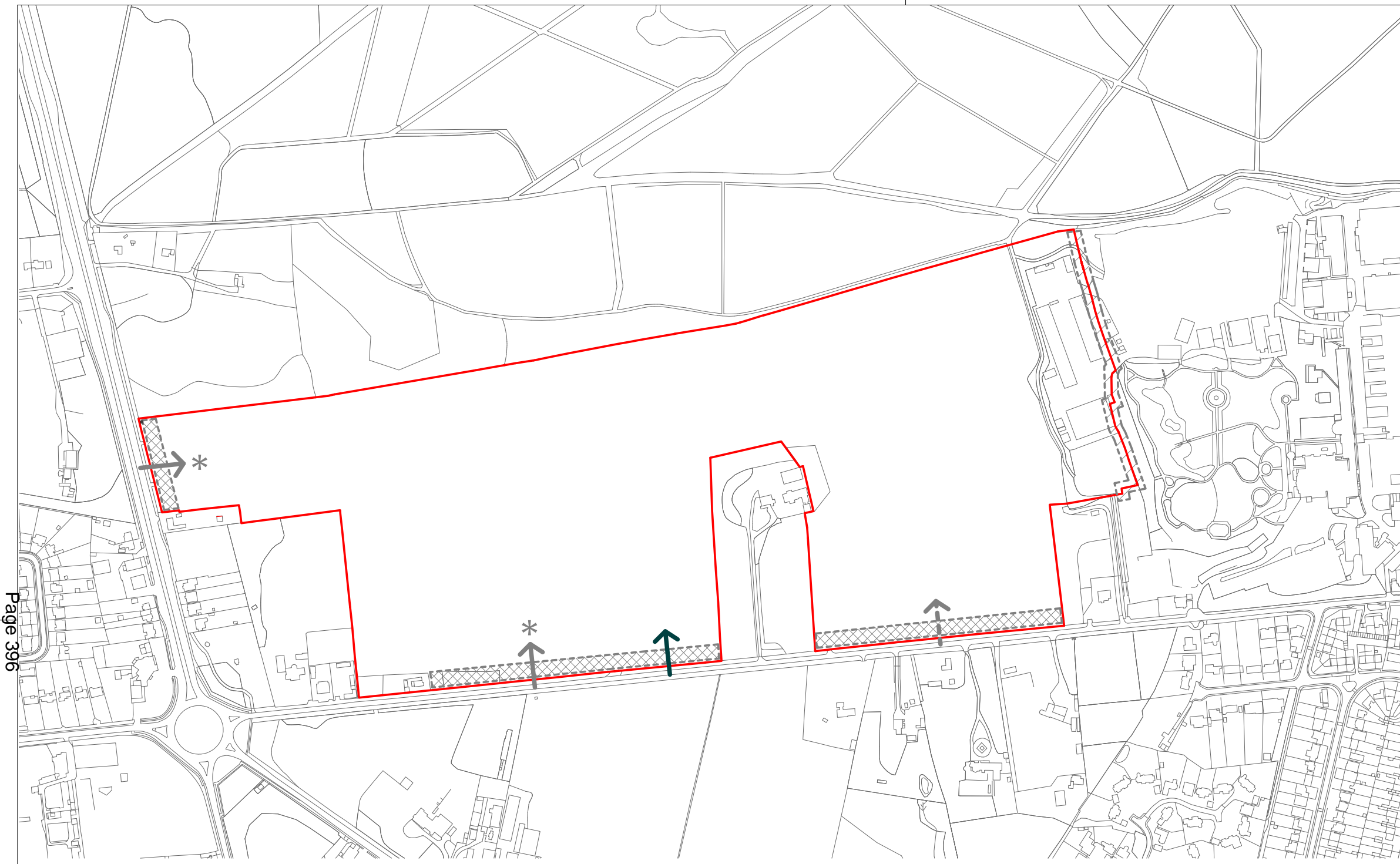
Access points will be provided to the site through the green boundary areas, including existing internal landscaping belts / areas. These access points will be located to minimise loss of existing vegetation.

Provision will be made for bat mitigation to recognise the presence of a Bechstein Bat colony within Black Park. This will be set out in a specific bat mitigation strategy and will include dark zone areas along the edge of Black Park and along the existing route of the Peace Path and reinforced planting (to support existing transect routes)

Page 395



Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Suitability:	Drawing No:	Rev:
P2	30.09.21	AMENDMENTS TO EXTEND EXTENT OF GREEN INFRASTRUCTURE TO ACCOMMODATE ADDITIONAL ECOLOGICAL MITIGATION	RM	CE	<b>PLANNING</b>		<b>3770-FB-XX-00-DR-A-01-125</b>	<b>P3</b>
P3	07.10.21	GREEN INFRASTRUCTURE AMENDED TO ACCOMMODATE ZONE C.	RM	CE		Job Title:	Job No:	© Drawing & Design Copyright of:
					Screen Hub UK, Pinewood Studios		3770	
					Drawing Title: <b>PP4 Green Infrastructure and Ecological Mitigation</b>			
		Date: 30/09/20		Scale: 1 : 5000		Drawn By: RM		Checked By: CE
					<b>FAULKNERBROWNS ARCHITECTS</b>			
							FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW T+44(0)191 2683007 F+44(0)191 2478132	



Notes:

The site will be accessed principally from Uxbridge Road and Pinewood Road with access also be provided to the north from the existing Pinewood Studios estate.

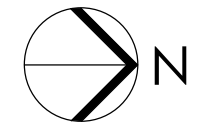
Additional service access points will also be required along Pinewood Road

The approval of the site entrance arrangements is included for approval under the outline planning application with its design detail for subsequent approval under reserved matter submissions and related highways agreements

Page 396

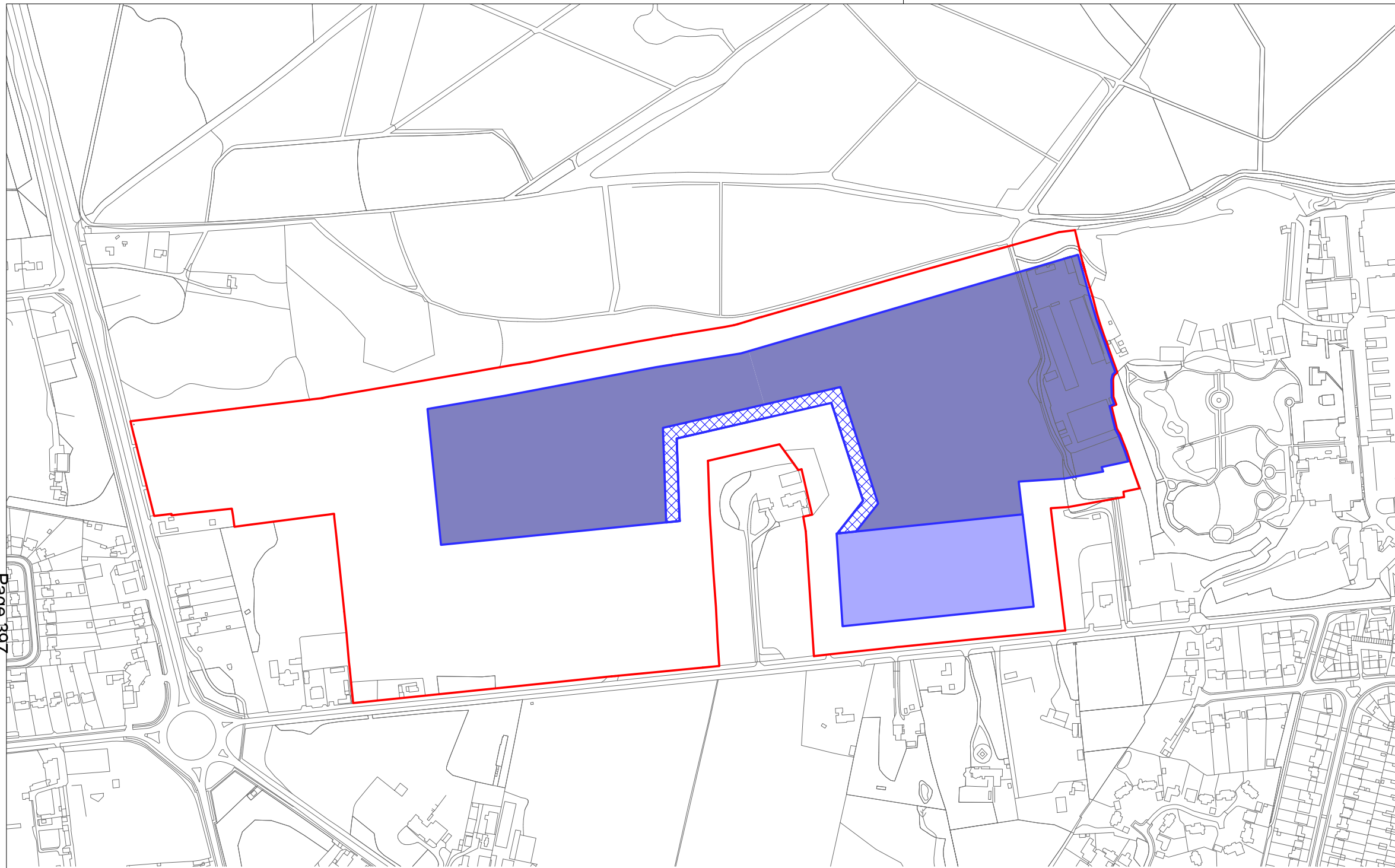
DIAGRAM KEY:

- APPLICATION BOUNDARY
- SECONDARY ACCESS (SERVICE)
- ACCESS ZONE
- PRINCIPAL ACCESS (ATTRACTION)
- \* MAJOR ENTRANCE FEATURE
- ACCESS ZONE FROM EXISTING STUDIO
- PRINCIPAL ACCESS (PRODUCTION)



<b>Rev</b>	<b>Date</b>	<b>Revision Notes</b>	<b>Drawn By</b>	<b>Checked By</b>	<b>Drawing Status:</b> <b>PLANNING</b>	<b>Suitability:</b>	<b>Drawing No:</b> <b>3770-FB-XX-00-DR-A-01-126</b>	<b>Rev:</b> <b>P1</b>
					<b>Job Title:</b> Screen Hub UK, Pinewood Studios		<b>Job No:</b> 3770	
					<b>Drawing Title:</b> PP5 Access and movement			
					<b>Date:</b> 30/09/20	<b>Scale:</b> 1 : 5000	<b>Drawn By:</b> RM	<b>Checked By:</b> CE
					<b>FAULKNERBROWNS ARCHITECTS</b>			
							FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW T+44(0)191 2683007 F+44(0)191 2478132	





**Notes:**

The maximum height of any building within the build areas shown will be as shown on the drawing (unless otherwise agreed by the planning authority).

The height is a maximum and it is not to be interpreted as the height of all buildings.

Building heights should be measured on the basis of being 1m + or - from the levels identified on PP1 (post completion of restoration).

Within the movement zone (PP3A), there will be some structures of a limited scale (predominantly single storey). These will be operational in terms of their use (such as gatehouses, entrance features, security buildings and support facilities for bus / coach drivers).

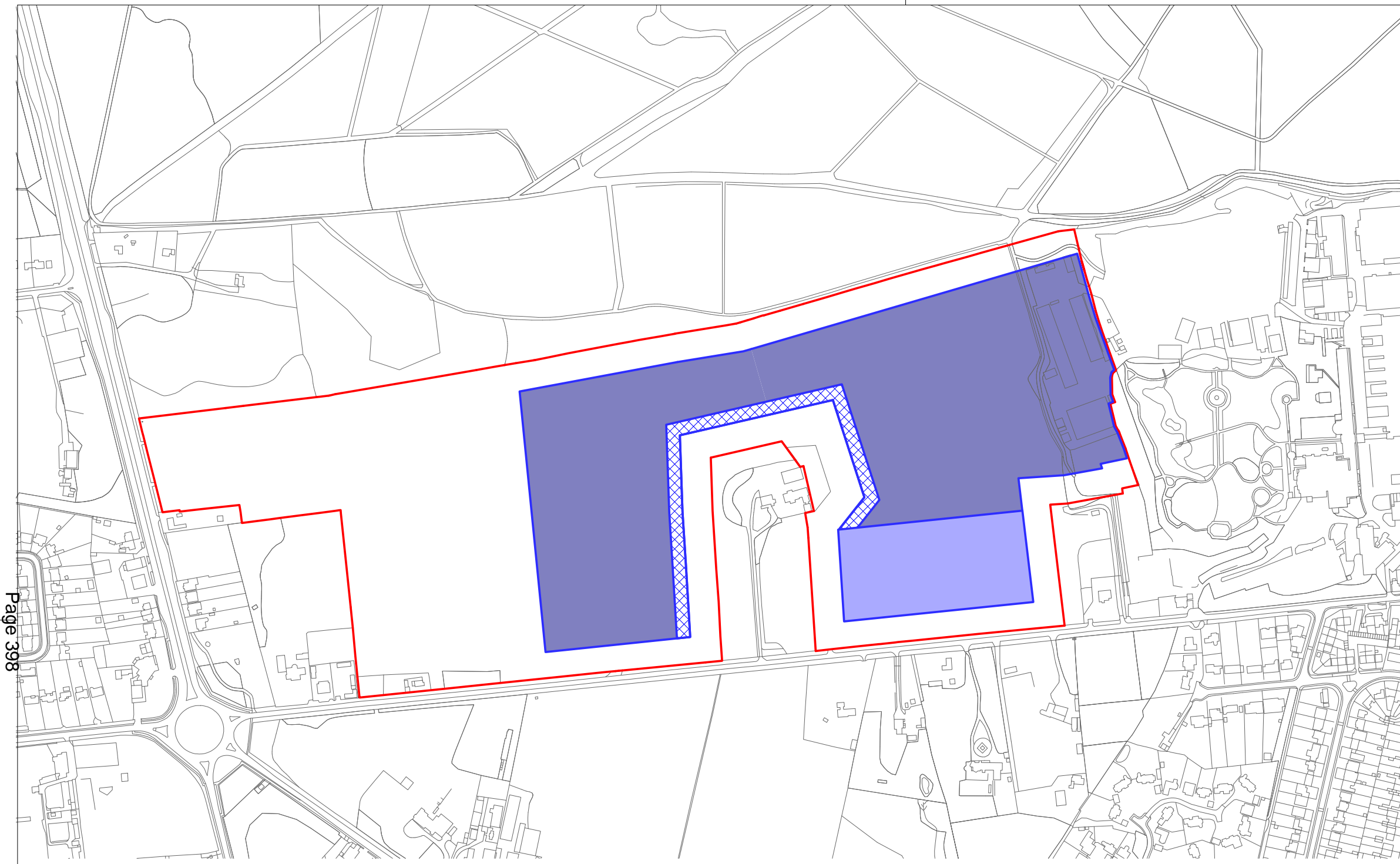
Within the 14.5m height zone, the height parameter relates to the business and education hub, which will be building(s) of no more than 3 storey and extending to a maximum floorspace of 4,645 sq m (50,000 sq ft). Consequently, the majority of the identified area will be for car park / movement use only.

**DIAGRAM KEY:**

- APPLICATION BOUNDARY
- +21.5m HEIGHT ZONE \*
- +14.5m HEIGHT ZONE
- +9.2m HEIGHT ZONE



Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Suitability:	Drawing No:	Rev:
P2	07.10.21	BUILDING HEIGHTS BOUNDARY ZONE UPDATED	RM	CE	<b>PLANNING</b>		3770-FB-XX-00-DR-A-01-127	P2
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					Screen Hub UK, Pinewood Studios	3770	<b>FAULKNERBROWNS ARCHITECTS</b> 	
					Drawing Title:			
					PP6A Building heights		FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW T+44(0)191 2683007 F+44(0)191 2478132	
		Date:	Scale:	Drawn By:	Checked By:			
		30/09/20	1 : 5000	RM	Checker			



**Notes:**

The maximum height of any building within the build areas shown will be as shown on the drawing (unless otherwise agreed by the planning authority).

The height is a maximum and it is not to be interpreted as the height of all buildings.

Building heights should be measured on the basis of being 1m + or - from the levels identified on PP1 (post completion of restoration).

Within the movement zone (PP3A), there will be some structures of a limited scale (predominantly single storey). These will be operational in terms of their use (such as gatehouses, entrance features, security buildings and support facilities for bus / coach drivers).

Within the 14.5m height zone, the height parameter relates to the business and education hub, which will be building(s) of no more than 3 storey and extending to a maximum floorspace of 4,645 sq m (50,000 sq ft). Consequently, the majority of the identified area will be for car park / movement use only.

Page 398

**DIAGRAM KEY:**

- APPLICATION BOUNDARY
- +21.5m HEIGHT ZONE \*
- +14.5m HEIGHT ZONE
- +9.2m HEIGHT ZONE




Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Suitability:	Drawing No:	Rev:	
P2	07.10.21	BUILDING HEIGHTS BOUNDARY ZONE UPDATED	RM	CE	<b>PLANNING</b>		3770-FB-XX-00-DR-A-01-128	P2	
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					Drawing Title:				
					Date:	Scale:	Drawn By:	Checked By:	
					30/09/20	1 : 5000	RM	CE	

Element	Area (Ha)	Area (acres)	Floorspace (Sqm)	Floorspace (sq ft)	Parking	Notes
Site (full)	32.6	80.5	69,677 m2	750,000 sq ft	Cars - 2,341 Coach/ Bus - 25 Cycle - 269	
Visitor Attraction			32,516 m2	350,000 sq ft	Cars - 1,400 Coach/ Bus - 25 Cycle - 70	5,000 non - peak 6,500 mid - peak 8,500 peak
Production Studio			32,516 m2	350,000 sq ft	Cars - 715 Cycle - 150	The production studio building area will include a backlot of circa 2 Ha*  Some parking will be available within the production studio building (approximately 100 spaces) with the remainder (circa 615) being in a dedicated car park
Education and Business Hubs			4,645 m2	50,000 sq ft	Cars - 226 Cycle - 49	
Green Infrastructure	10.7	26.5				Black Park Buffer - up to 30m wide Amenity Buffer - up to 25m wide Net Biodiversity Gain - at least 10%

Notes:

1. All areas are maxima and exclude any existing buildings.

\* The floorspace figure for production (350,000 sq ft) will be in addition to any provision of space for backlot

Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Suitability:	Drawing No:	Rev:
P2	30.09.21	AMENDMENTS TO EXTENT OF GREEN INFRASTRUCTURE TO ACCOMMODATE ADDITIONAL ECOLOGICAL MITIGATION	RM	CE	<b>PLANNING</b>		3770-FB-XX-00-SC-A-01-000	P3
P3	07.10.21	GREEN INFRASTRUCTURE AMENDED TO ACCOMMODATE ZONE C.	RM	CE				
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					Screen Hub UK, Pinewood Studios	3770	<b>FAULKNERBROWNS ARCHITECTS</b> 	
					Drawing Title:			
					PP7 Development numbers and yield			
					Date:	Scale:	Drawn By:	Checked By:
					30/09/20	1 : 2000	RM	CE
					FaulknerBrowns LLP Dobson House Northumbrian Way Killingworth Newcastle upon Tyne NE12 6QW T+44(0)191 2683007 F+44(0)191 2478132			

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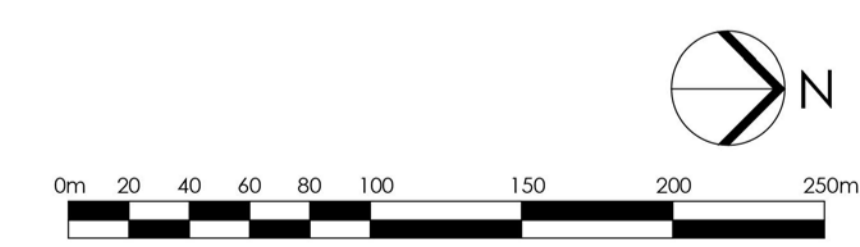
**APPENDIX C: Illustrative Masterplans**





Page 402

Illustrative masterplan option A  
1:2500



Do not scale this drawing  
Do not derive dimensions from digital media

Rev	Date	Drawn By	Checked By	Rev	Date	Revision Notes	Drawn By	Checked By	Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev.		
P1	30.09.2021		RM	CE										PLANNING	S4	3770-FBA-XX-00-DR-A-01_110	P3		
P2	19.10.2021		RM	CE										Screen Hub UK, Pinewood Studios	Job No: 3770				
P3	26.10.2021		RM	CE										Illustrative Proposed Masterplan (A)					
														Date: 30.09.2020	Scale: 1 : 2500	Drawn By: RM	Checked By: CE	<b>FAULKNERBROWNS ARCHITECTS</b> 	
																<small>FaulknerBrowns LLP          Oldson House          Northumbrian Way          Kingsnorth          Newcastle upon Tyne          NE12 6JW          T+44(0)191 2683007          F+44(0)191 2478132</small>			





Page 403

Illustrative masterplan option B  
1:2500

Illustrative building area schedule B		
Unit Type	GEA m2	GEA ft2
Production	32,274	347,390
Attraction / Experience	32,316	350,000
Growth Hub / Education	2,320 / 2320	25,000 / 25,000
<b>Total</b>	<b>69,230</b>	<b>747,390</b>

Illustrative site area schedule B		
Name	Area (acres)	Area (ha)
Backlot 1 (new)	3.57	1.44

Illustrative car parking B	
Key Name	Number of spaces
Attraction/Experience	1,400
Production	606
Growth hub/ Education	226
<b>Total</b>	<b>2,232</b>

**Key:**

- Application boundary
- Attraction / Experience
- Growth Hub / Education
- Backlot
- Sound stage
- Office
- Workshop



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Rev	Date	Drawn By	Checked By	Rev	Date	Revision Notes	Drawn By	Checked By	Rev	Date	Revision Notes	Drawn By	Checked By

Drawing Status:	SKETCH	Suitability:		Drawing No:	3770-FBA-XX-00-DR-A-01_111
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Drawing Title:	Illustrative Proposed Masterplan (B)			<b>FAULKNERBROWNS ARCHITECTS</b>	
Date:	30.09.2020	Scale:	1 : 2500	Drawn By:	CL
				Checked By:	CE

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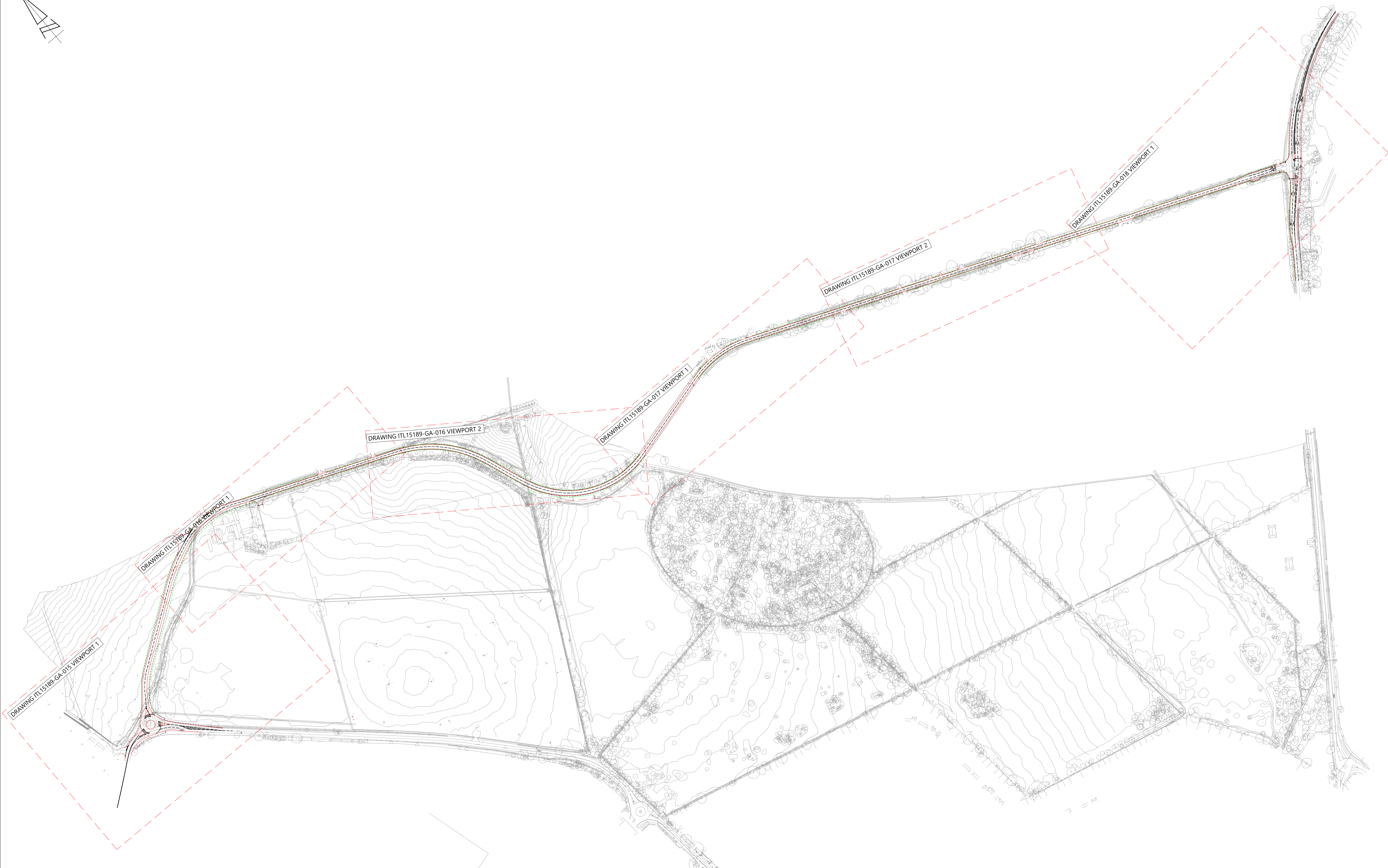
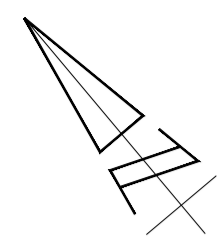


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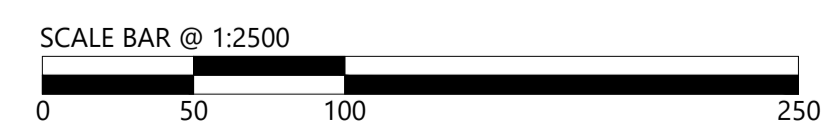
**APPENDIX D: The Sevenhills Road Highway Mitigation Scheme**

- ITL 15189-GA-014 revision E
- ITL 15189-GA-015 revision E
- ITL 15189-GA-016 revision E
- ITL 15189-GA-017 revision E
- ITL 15189-GA-018 revision E





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REV	DATE	BY	DESCRIPTION	CHK	APP	PROJECT	CLIENT
E	27.03.20	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB	PINEWOOD STUDIOS - SEVEN HILLS UPGRADE	PINEWOOD STUDIOS GROUP
D	10.01.20	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB		
C	03.12.19	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB		
B	27.11.19	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB		
A	15.11.19	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB		
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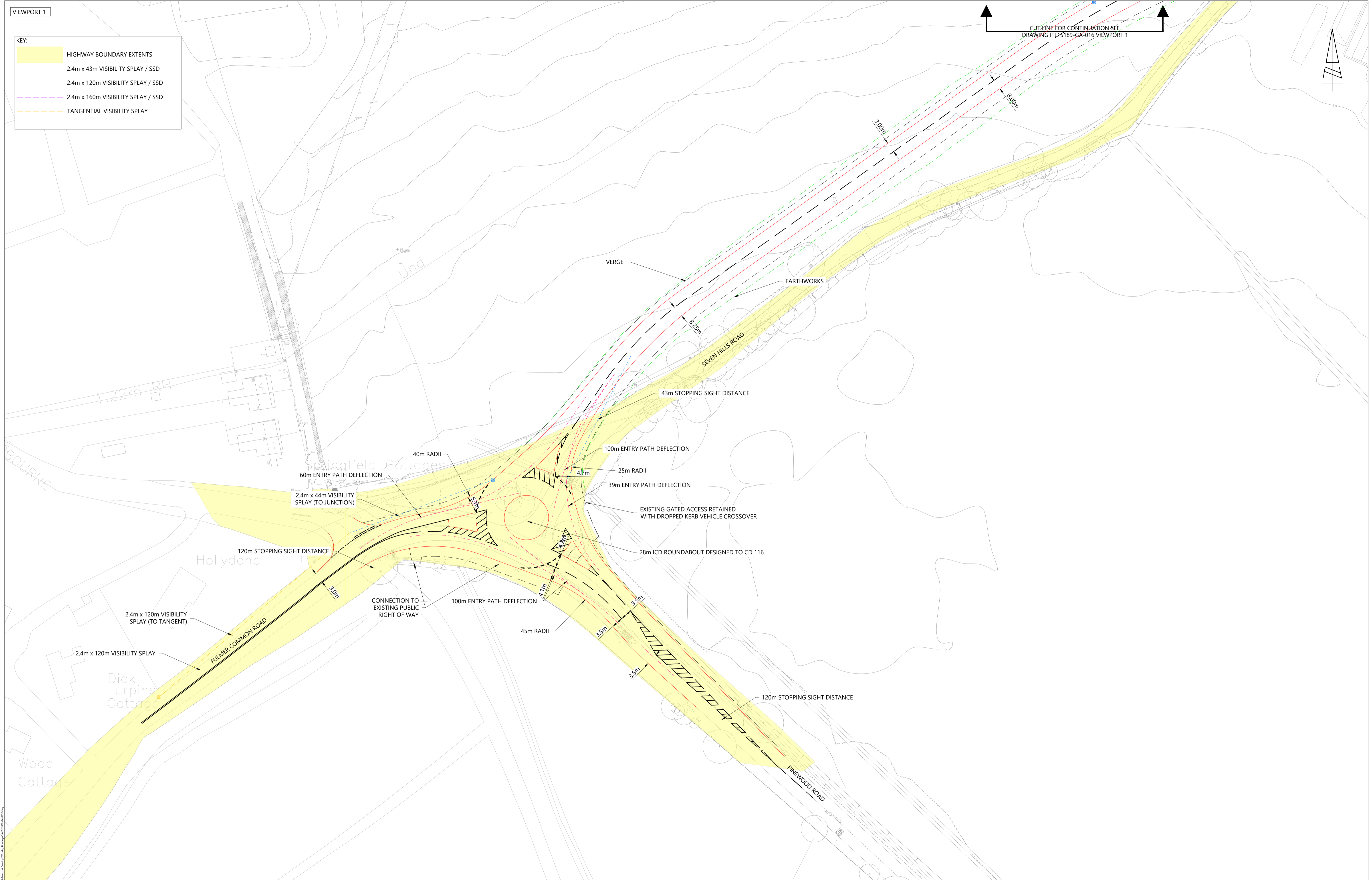
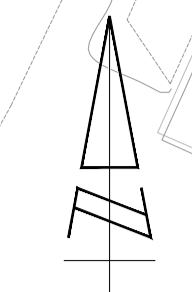
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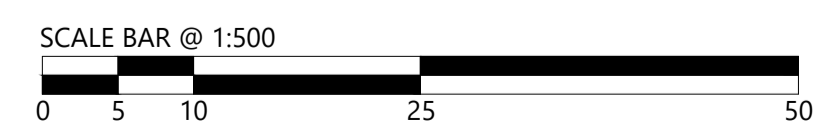
CUT-LINE FOR CONTINUATION SEE  
DRAWING ITL15189-GA-016 VIEWPORT 1



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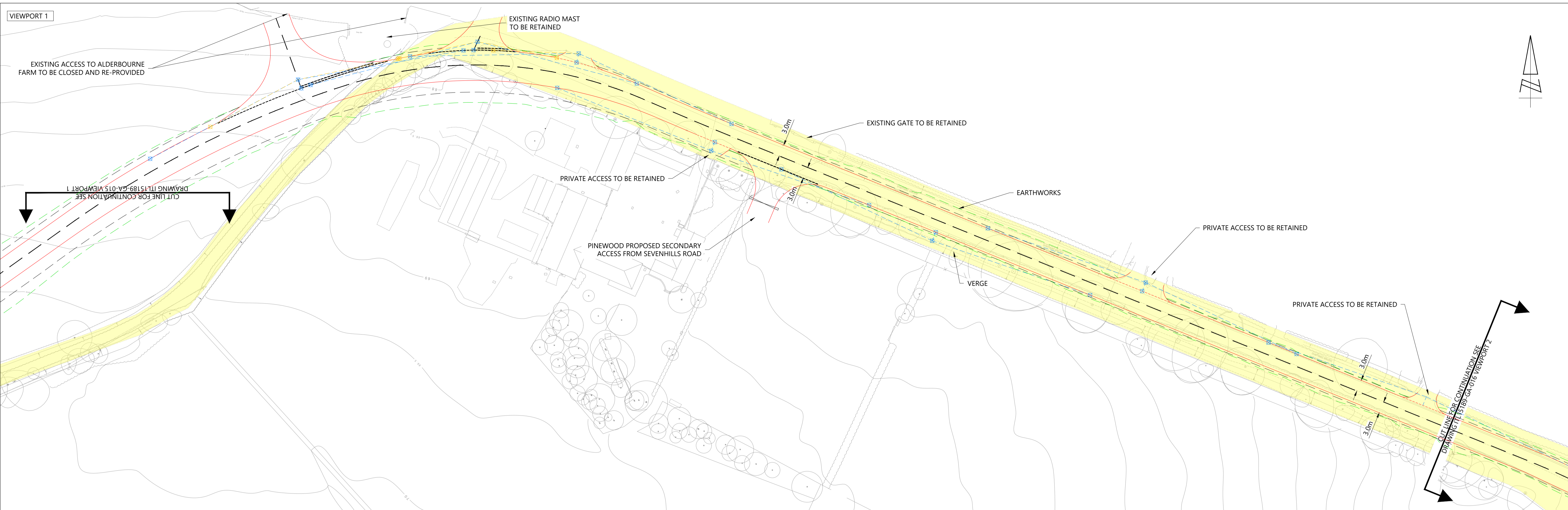
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B	23.11.19	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB	
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TITLE: HIGHWAY ALIGNMENT ALONG SEVEN HILLS ROAD SHEET 2 OF 5 (PRIVATE & CONFIDENTIAL)		CLIENT: PINewood STUDIOS - SEVEN HILLS UPGRADE	CLIENT: PINewood STUDIOS GROUP
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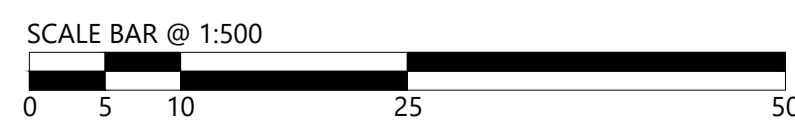
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**KEY:**

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A	15.11.19	MC	HIGHWAY ALIGNMENT REVISED	NC	JCB	

TITLE	CLIENT
HIGHWAY ALIGNMENT ALONG SEVEN HILLS ROAD SHEET 3 OF 5 (PRIVATE & CONFIDENTIAL)	PINEWOOD STUDIOS GROUP
PROJECT	PINEWOOD STUDIOS - SEVEN HILLS UPGRADE

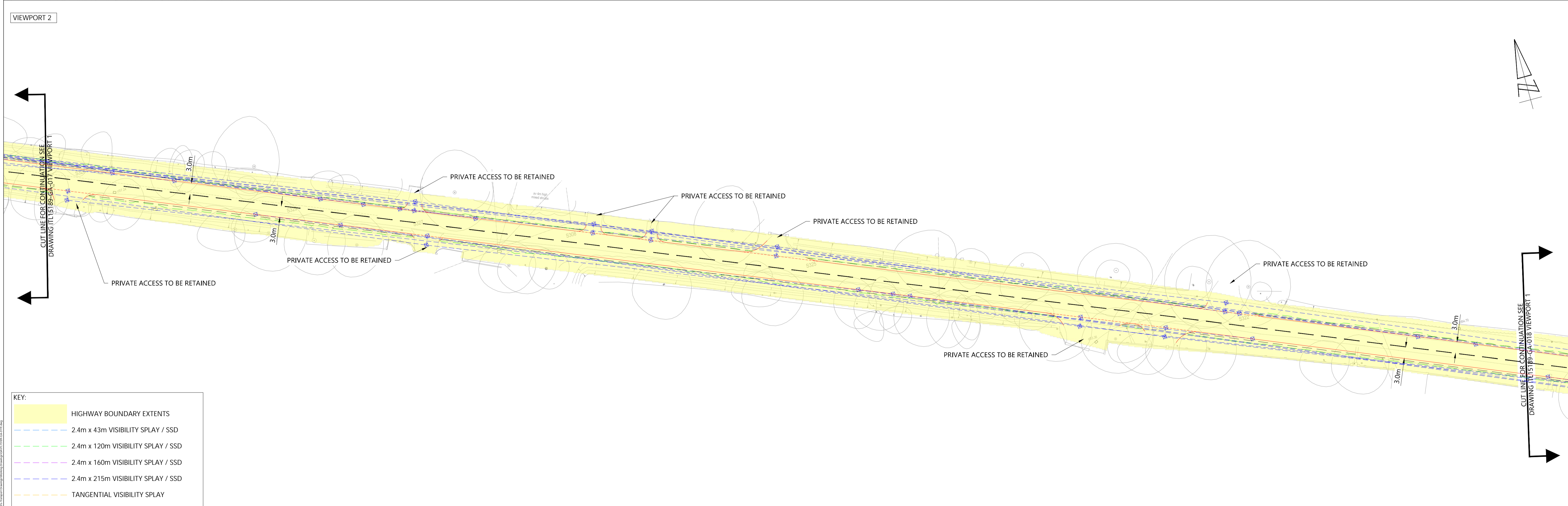
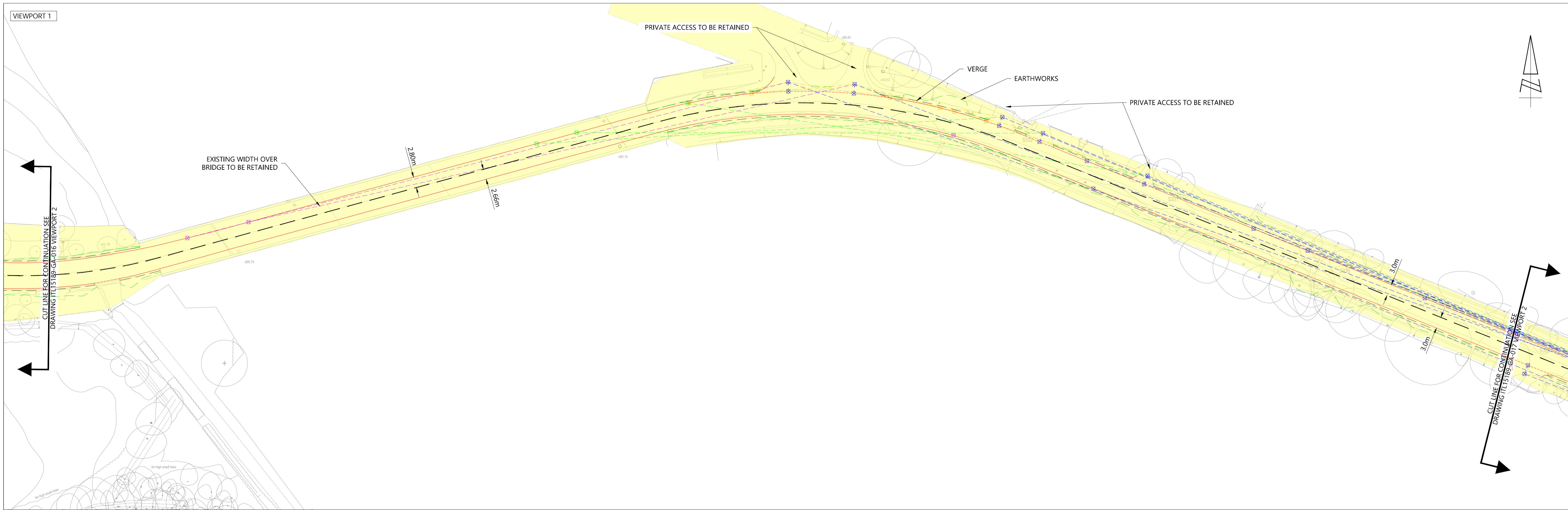
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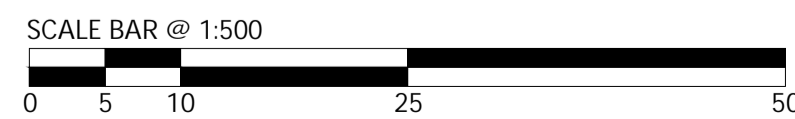
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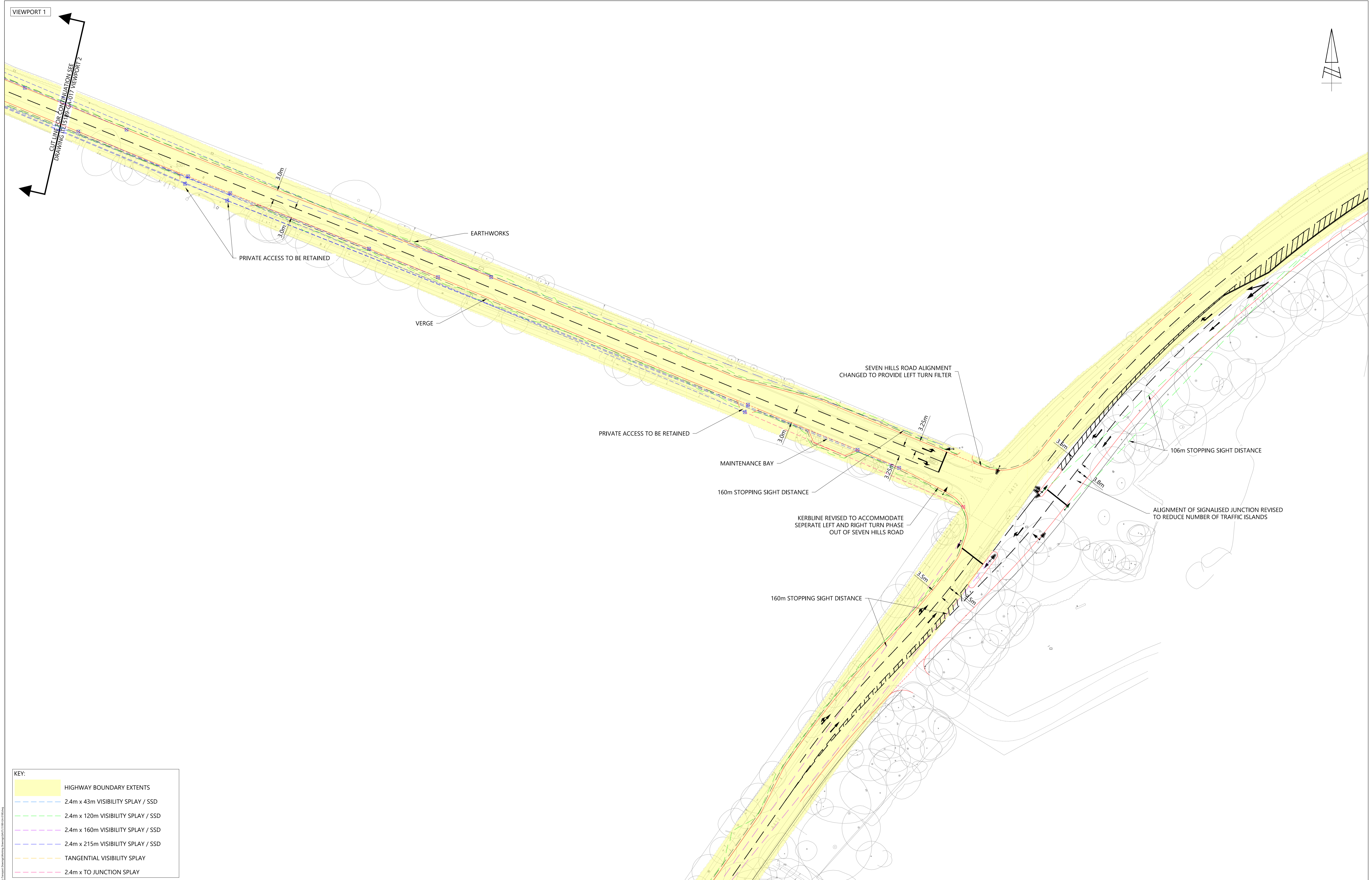


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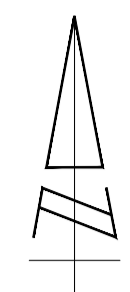
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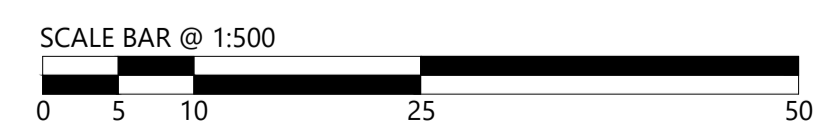
VIEWPORT 1

CUT LINE FOR CONTINUATION SEE DRAWING ITL15189-GA-017 VIEWPORT 2



**KEY:**

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	2.4m x TO JUNCTION SPLAY



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REV	DATE	BY	DESCRIPTION	CHK	APP	PROJECT
E	27.03.20	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB	HIGHWAY ALIGNMENT ALONG SEVEN HILLS ROAD SHEET 5 OF 5 (PRIVATE & CONFIDENTIAL)
D	10.01.20	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB	
C	03.12.19	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB	
B	23.11.19	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB	
A	15.11.19	MC	HIGHWAY ALIGNMENT REVISED	MC	JCB	
STATUS: FOR INFORMATION						

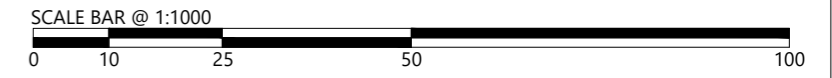
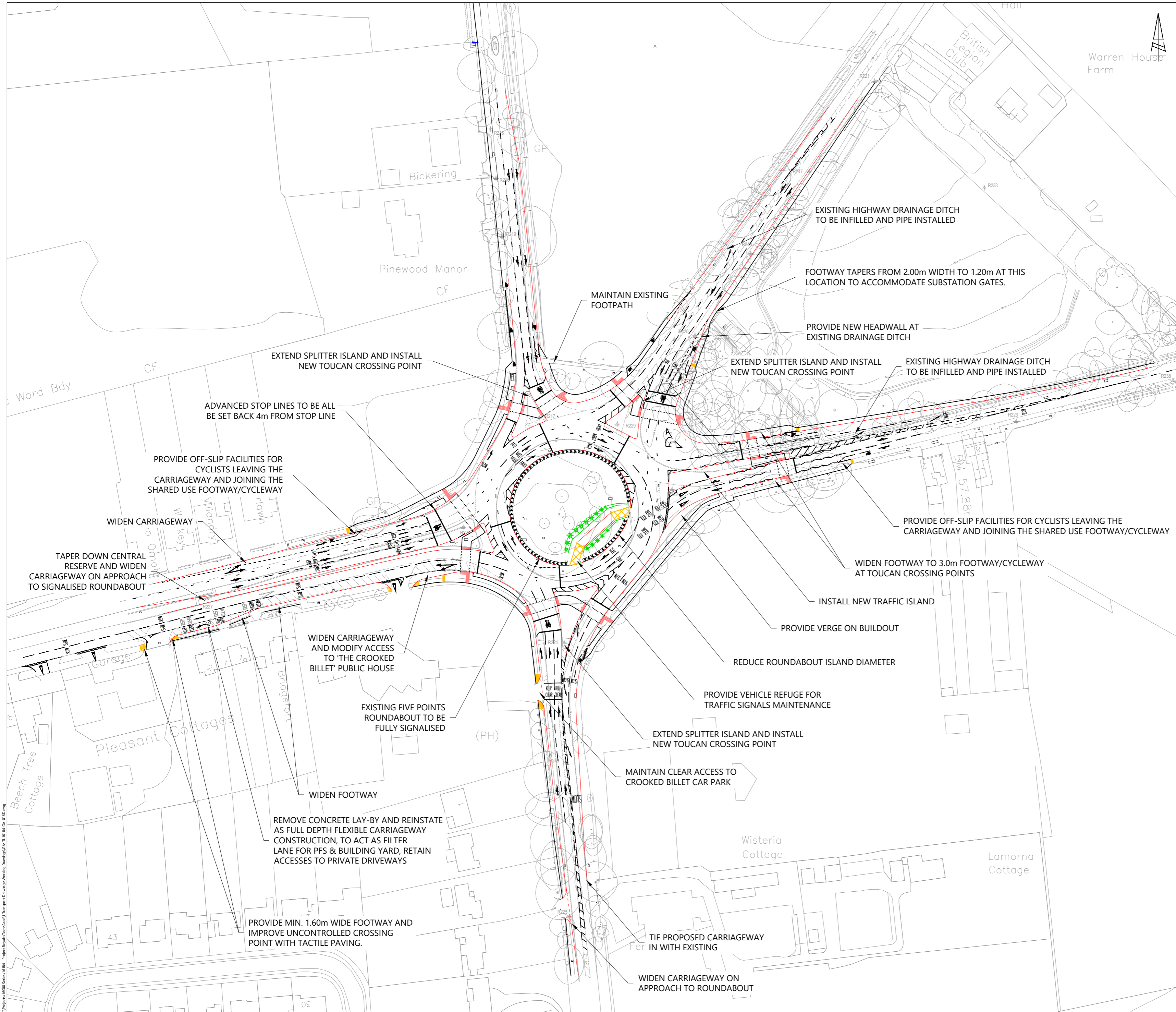
TITLE	CLIENT
HIGHWAY ALIGNMENT ALONG SEVEN HILLS ROAD SHEET 5 OF 5 (PRIVATE & CONFIDENTIAL)	PINWOOD STUDIOS GROUP
PROJECT	PINWOOD STUDIOS - SEVEN HILLS UPGRADE

DRAWN	CHECKED	APPROVED
MC	DF	JCB
PROJECT No:	SCALE @ A1:	DATE:
ITL15189	1:500	01.11.19
DRAWING No:	ITL15189-GA-018	REV:
		E



## **APPENDIX E: The Five Points Roundabout Highway Mitigation Scheme**

ITL 16184-GA-16 revision D



REV	DATE	BY	DESCRIPTION	CHK	APP
D	29.09.21	JMc	ANNOTATIONS ADDED	DF	JCB
C	27.09.21	JMc	EXISTING FOOTWAY ON PINWOOD ROAD ADDED	DF	JCB
B	15.07.21	MC	HIGHWAY BOUNDARY ADDED	DF	JCB
A	17.12.20	MC	A412 CHURCH ROAD SOUTHBOUND CROSSING AMENDED	DF	JCB

STATUS: FOR INFORMATION



85 Gresham Street, London, EC2V 7NQ Tel: 020 3705 9215  
www.i-transport.co.uk

TITLE: PROPOSED FIVE POINTS ROUNDABOUT

PROJECT: SCREEN INDUSTRIES GLOBAL GROWTH HUB

CLIENT: PINWOOD STUDIOS GROUP

DRAWN: MC	CHECKED: DF	APPROVED: JCB
PROJECT No: ITL16184	SCALE @ A2: 1:1000	DATE: 02.12.20
DRAWING No: ITL16184-GA-016	REV: D	

## APPENDIX F: Schedule of mitigation

### Schedule of Mitigation

The ES has considered primary and tertiary mitigation prior to undertaking the assessment of likely significant effects. Following the conclusion of effects based on the proposed scheme any further mitigation measures or monitoring arrangements i.e. secondary mitigation, have been identified. The hierarchy of mitigation measures is summarised below.

#### Primary Mitigation – modifications to the location or design

1. **Heights of buildings** PP6A – Building Heights and PP6B – Building Heights.
2. **Green infrastructure** of 25-30m around the Site (except for access points) - PP4 – Green Infrastructure.
- 3 + 4 Retention of high and medium value **trees**. More replacement trees will be provided than lost.
5. The **woodland belts** will be provided.
6. The Proposed Scheme will deliver a minimum of **10% biodiversity net gain**.
7. **Lighting** will be designed in accordance with best practice guidance, Framework Lighting Strategy.
8. A Surface Water Drainage scheme.
9. **Climate Change** commitments:
  - During the design phase an assessment will be carried out of the embodied carbon of new buildings to identified potential materials and measures to reduce the embodied carbon;
  - Dynamic thermal modelling of the buildings will be undertaken at detailed design in order to evaluate + mitigate potential summertime overheating risks;
  - Target a 25% reduction in water consumption relative to baseline performance;
  - A “fabric first” approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2013;
  - High efficiency gas boilers or low carbon heat pumps where heating is required; and
  - A 10% reduction in operational CO2 emissions beyond Building Regulations standards through the provision of low carbon renewable energy.
10. A **Waste Strategy** will be prepared and submitted for approval.
11. External night working within the production area will be subject to an **operational management plan**.

#### Tertiary Mitigation - actions to meet legislation requirements, or standard practices.

12. A Construction Environmental Management Plan will be prepared, **CEMP**.
13. Water: Use of **pollution prevention** systems in line with EA Pollution Prevention Guidance
- 14 to 18. A **Materials and Waste Management Strategy** (MWMS) will be produced.
19. Appropriate **gas protection** measures will be installed.

#### Secondary mitigation – further actions required.

- 20+21. **Badger** surveys to inform detailed mitigation for badgers.

22+23. **Bats** Roost inspections will be undertaken prior to construction to inform detailed mitigation

24. **Breeding birds** survey and a mitigation strategy.

25 **Reptiles** - an appropriate mitigation strategy

26. The location and design of the permissive path will be confirmed as part of reserved matters and will include the preparation of a **recreational access and management strategy** (RAMS) to control access and manage the impact on the biodiversity value of Black Park

Where appropriate these mitigation measures will be secured by planning condition or S106 planning agreement obligations.

**APPENDIX G: PSDF Appeal Decision 13/00175/OUT (extract)**



Department for  
Communities and  
Local Government

Mr Graham Love  
Turley Associates  
1 New York Street  
Manchester  
M1 4HD

Our Ref: APP/N0410/A/13/2199037  
Your ref: PINM2001

18 June 2014

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990 (SECTION 78)  
APPEAL BY PINWOOD STUDIOS LTD  
LAND AT AND ADJACENT TO PINWOOD STUDIOS, PINWOOD ROAD, IVER  
HEATH, BUCKINGHAMSHIRE  
APPLICATION REF: 13/0175/OUT**

1. I am directed by the Secretary of State to say that consideration has been given to the report of the Inspector, Terry G Phillimore MA MCD MRTPI, who held an inquiry on dates between 19 November to 13 December 2013 in relation to your client's appeal under Section 78 of the Town and Country Planning Act 1990 against the decision of South Bucks District Council to refuse planning permission for:

*the reconfiguration and expansion of facilities for screen based media, including film, television and video games and associated services and industries, comprising: demolition of existing outdated accommodation; erection of new stages, workshops, office accommodation, demountable modular buildings, entrance structures and reception and security offices, gas CHP energy centre, underground waste water treatment plant, recycling facilities, backlots and film streetscapes; external film production; creation of a new vehicular and pedestrian access from Pinewood Road, a new access from Sevenhills Road for use as both an emergency access and a secondary controlled vehicular access, access roads within the site, surface and multi-level car parking; and associated landscaping and ecological habitat creation works, in accordance with application ref:13/00175/OUT, as amended on 30 September 2013.*

2. The appeal was recovered for the Secretary of State's determination on 4 June 2013, in pursuance of section 79 of, and paragraph 3 of Schedule 6 to, the Town and Country Planning Act 1990, because the appeal involves proposals for significant development in the Green Belt.

Julian Pitt  
Planning Casework Division  
Department for Communities and Local Government  
Zone 1/H1, Eland House  
Bressenden Place  
London SW1E 5DU

Tel 0303 4441630  
Email: PCC@communities.gov.uk



### **Inspector's recommendation**

3. The Inspector recommended that the appeal be allowed and planning permission granted subject to conditions. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions and recommendation. A copy of the Inspector's report (IR) is enclosed. All references to paragraph numbers, unless otherwise stated, are to that report.

### **Procedural Matters**

4. In reaching this position the Secretary of State has taken account the Environmental Statement which was submitted (IR8 and 828) and the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The Secretary of State is content that the Environmental Statement complies with the above Regulations and that sufficient information has been provided for him to assess the environmental impact of the appeal proposal.

### **Matters arising after the close of the inquiry**

5. The Secretary of State received a letter dated 17 December 2013 from Michael J Woods, Director and Company Secretary of Colne Valley Park Community Interest Company which states that the Company receive no income from Pinewood Studios. The Secretary of State notes that this statement contradicts the appellant's closing submission made at the inquiry and the comments made by the Inspector on funding contributions at IR697, but is satisfied that this matter does not affect his decision in this case.
6. The Secretary of State is also in receipt of the other correspondence listed at Annex B which was either received following the close of the inquiry or otherwise not seen by the Inspector. He notes that many of these representations argue that the announcement of a deal between Pinewood Studios and the Welsh Government to create a 17,000m<sup>2</sup> new film studio in Cardiff weakens the case for this appeal proposal. Although the Inspector may have been unaware of the Cardiff proposal, he concluded that under the appellant's base case forecast there is considerable potential for additional studio facilities elsewhere in the UK as well as the appeal proposal and that, if the appellant's calculation of requirements is accepted, the appeal scheme would capture only a minority proportion of this (IR795). As the Secretary of State accepts the Inspector's conclusion that the appellant's calculation of requirements is robust (paragraph 21 of this letter) he is satisfied that the Cardiff announcement does not diminish the case for expansion at Pinewood Studios' main site in Buckinghamshire. The Secretary of State therefore has not considered it necessary to seek parties' comments on the announcement of the Cardiff proposal.
7. Copies of the representations listed at Annex B are not enclosed but may be obtained on written request to the address at the foot of the first page of this letter.

### **Policy Considerations**

8. In deciding this appeal, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

9. In this case, the development plan consists of the 2011 South Bucks Local Development Framework Core Strategy Development Plan Document, the 1999 South Bucks District Local Plan (saved version), the 2012 Buckinghamshire Minerals and Waste Core Strategy Development Plan Document, and the 2006 Buckinghamshire Minerals and Waste Plan (saved version). The Secretary of State considers that the development plan policies most relevant are those identified by the Inspector at IR46-49 and IR52-59. He also considers that the Core Strategy content identified at IR45 and IR50 are particularly relevant to this case.
10. Other material considerations which the Secretary of State has taken into account include the National Planning Policy Framework (“the Framework” – March 2012) the associated planning guidance (March 2014), the Community Infrastructure Levy (CIL) Regulations 2010 (as amended), the statements of Government policy relating to the delivery of sustainable economic growth listed at IR61, the cross-departmental policy documents relating to the UK film, television and screen-based creative industries listed at IR62 and the Government’s ‘Response to the CMS Select Committee Report on the Creative Economy: Third Report of Session 2013-14’ identified at IR63.

### **Main issues**

11. The Secretary of State agrees with the Inspector that the main considerations are those set out at IR657.

### **The impact the proposal would have on the Green Belt, including openness, purposes, the use of land and visual amenity**

12. For the reasons given by the Inspector at IR663-684, the Secretary of State agrees with the Inspector’s conclusion that in addition to the harm to the Green Belt by definition as a result of the inappropriate development, the proposal would give rise to harm by reason of loss of openness, conflict with three of the five Green Belt purposes and a moderate adverse effect on landscape and visual amenity (IR685).
13. The Secretary of State notes that concern was expressed at the inquiry about any precedent the approval of this appeal could set, but given the unique circumstances of this case, the Secretary of State agrees with the Inspector that the weight of policy considerations applicable to proposals for development in the Green Belt would not be diminished should planning permission be granted (IR686).
14. As the Inspector identifies in his report (IR687), the proposal would approximately double the area of the existing Pinewood Studios and to a large degree replicate its existing physical form on undeveloped Green Belt land. The Secretary of State agrees with the Inspector’s conclusion that the harm to the Green Belt in this case, and the conflict with the development plan in that respect, is a matter that should be accorded very serious weight in his decision (IR687).



### **The effect the proposal would have on the Colne Valley Park**

15. For the reasons given by the Inspector at IR689 and 691-692 the Secretary of State agrees with the Inspector's conclusion that in overall terms, the proposed substantial physical development within a large area that is existing countryside would have a significant adverse effect on the Colne Valley Park (IR697).
16. The Inspector in the 'Project Pinewood' appeal case (IR39-41) noted that, if the positive aspects of the proposal were concluded to clearly outweigh the harm to the Green Belt, then the same considerations would equally apply and outweigh the harm to the Colne Valley Park. The Secretary of State agrees with the current Inspector that this applies similarly to the application of Core Policy 9 and that the significant harm to the Colne Valley Park is to be weighed in the balance, but with the proviso that, to the extent that the harm relates to landscape, it is the same as that identified under Green Belt impact rather than being additional (IR698).

### **Whether the development would be sustainable in transport terms**

17. For the reasons given by the Inspector at IR700-711, the Secretary of State agrees with the Inspector that with around a doubling of the numbers employed at the Studios expected as a result of the proposal, it would give rise to a substantial increase in journeys reliant on the private car, with a much greater number than the approved Masterplan development. The Secretary of State also agrees that this would be a negative outcome of the proposal, and a matter to be drawn into the overall balance of benefit and harm (IR712).

### **The impact the proposal would have on highway conditions**

18. For the reasons given by the Inspector at IR714-724 the Secretary of State agrees with the Inspector that there is no evidence that the impacts in this case would reach the 'severe' threshold at paragraph 32 of the Framework, but that the addition to local congestion and rat-running would be a moderate harm that falls to be taken into the overall balance (IR724).

### **The merits of the appellant's case for expansion of Pinewood Studios**

19. The Secretary of State agrees with the Inspector's assessment of the appellant's case for the expansion of Pinewood Studios at IR725-799. On this basis he agrees with the Inspector's overall conclusions on the case for expansion at IR800-807. He agrees with the Inspector's conclusion that Pinewood Studios has a leading global status, and is an essential component of the UK film industry, which makes a substantial contribution to the UK economy. He agrees too that Government policy seeks sustainable economic growth, and as part of this attaches high importance to the creative industries and specifically film (IR800).
20. The Secretary of State acknowledges that the proposal would approximately double the existing Pinewood Studios in terms of size and capacity, and recognises that there is a widely acknowledged current shortage in UK studio capacity, with strong industry support for the proposal. In addition to this, he agrees that the proposal is backed by a proper business assessment of future requirements. The appellant's analysis takes a long-term view which the Secretary of State considers is appropriate for major capital project investment. He also agrees that under the base case projection there would be substantial growth in film production expenditure by 2032 (IR801).

21. The appellant's top-down methodology makes a number of explicit assumptions, and the Secretary of State accepts there are uncertainties in these respects that potentially bear on the weight that can be given to the base case forecast. He agrees with the Inspector that these particularly relate to the specific nature of the film industry and unknowns regarding the future of the traditional Hollywood film model, which is a key element in UK inward investment film production expenditure, and such factors as digitisation and the studio requirements of television production. He agrees too that the shifting nature of development proposals brought forward by the appellant in recent years is indicative of changing expectations of future requirements. Nevertheless, the Secretary of State agrees that the base case projection appears to be robust, having regard to long term trends and its endorsement in independent assessments. Like the Inspector, he is satisfied that it can be regarded as the most likely future outcome based on current best information. He also agrees that the inflation-only case provides an appropriate representation of the downside risks (IR802).
22. In terms of the translation to stage space requirements, the Secretary of State agrees with the Inspector that there are some reasonable reservations about this element of the appellant's analysis, in particular with regard to high-end television and the scope for efficiencies in the use of ancillary space. However, he also agrees that there is a further considerable degree of robustness in that the proposal would provide for only 38% of the projected UK floorspace requirement under the base case. On the risk side, the Secretary of State accepts that under the inflation-only case there would be no requirement for additional floorspace (IR803).
23. The Secretary of State agrees with the Inspector that there is some weakness in the justification for the Media Hub expansion, but that the qualitative benefits of this are convincing and that it relates only to a limited part of the proposal within the Green Belt (IR804). The Secretary of State agrees with the Inspector's conclusion that the proposal would deliver substantial economic benefits if implemented and occupied in full (IR805).
24. Like the Inspector, the Secretary of State is satisfied that alternatives have been reasonably considered by the appellant. He agrees that there is no firm evidence to undermine the conclusion that there is no identifiable alternative site that could accommodate the scale and nature of the appeal proposal, although options for a lesser provision of new studio space exist (IR806).
25. Overall, the Secretary of State agrees with the Inspector's conclusion that there is a very strong, credible economic case for the proposed expansion. While recognising that there is a degree of risk arising from uncertainty, the Secretary of State accepts that the case is sufficiently compelling to be given substantial weight in support of the development (IR807).

### **Planning conditions and obligations**

26. The Secretary of State has considered the Inspector's reasoning and conclusions on conditions (IR808–821), as well as his recommended conditions as set out in the Annex to his report (IR pages 158-165). The Secretary of State is satisfied that the proposed conditions are reasonable and necessary and would meet the tests of paragraph 206 of the Framework.

27. The Secretary of State has had regard to the submitted legal agreements, the Inspector's comments at IR822-826, national policy set out at paragraphs 203-205 of the Framework, the planning guidance and the CIL Regulations. He agrees with the Inspector's assessment at IR826 and considers that the obligations comply with regulation 122 of the CIL Regulations 2010 and can be given weight in support of the proposal.

**Whether the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify such inappropriate development**

28. The Secretary of State agrees with the Inspector's overall summary of the harms in regard to the Green Belt, the Colne Valley Park, sustainable transport and traffic at IR829-835. He also agrees that the proposal is, overall, not in accordance with the development plan (IR836).

29. The Secretary of State agrees with the Inspector's conclusion that this proposal constitutes inappropriate development in the Green Belt which is contrary to an up-to-date development plan and can only be approved on the basis of very special circumstances. He agrees too that the provisions for applying a presumption in favour of sustainable development in decision-taking set out in paragraph 14 of the Framework do not apply in this case. Nevertheless, the Secretary of State accepts that given the goal of sustainable development, the performance of the proposal in this respect is a matter to be addressed, dealing with the economic, social and environmental roles of the planning system (IR837).

30. The Secretary of State agrees with the Inspector that the design and technical aspects of the development would meet sustainability criteria, and a gain in biodiversity would be delivered. Weighing against the proposal, the Secretary of State agrees with the Inspector that the incursion into Green Belt and loss of undeveloped land would be a negative environmental effect. There would also be an adverse social impact with respect to the concern expressed in widespread local objection to such an intrusion. Conversely, with the recognised cultural contribution made by Pinewood Studios and the film industry, the Secretary of State considers that there would be a boost to this which would be a positive social aspect of the expansion (IR838).

31. The Secretary of State accepts the proposal does not fully represent a focussing of significant development in a location which is or can be made sustainable in transport terms, as sought by paragraph 17 of the NPPF. He agrees with the Inspector that the extent to which it would give rise to an increase in journeys reliant on the private car would be a negative outcome, but that an increased demand for travel is a general consequence of new development (IR839).

32. In terms of the economic dimension of sustainable development, there is a strong national commitment to economic growth and support for the film industry. The secretary of State agrees with the Inspector that the potential economic benefits of the proposal would contribute significantly to these national objectives. However, as the Inspector points out, there is no general dispensation for economic development to override the Government's continuing firm commitment to Green Belt protection. Nor is there any such provision for the film industry in particular, and the support for this is not quantified or location specific in terms of new studios

development. The Secretary of State agrees with the Inspector that the requirement for very special circumstances to be established remains applicable for any exception to be made (IR840).

33. Subject to there being very special circumstances in this case, considered below, the Secretary of State agrees with the Inspector that the proposal would be reasonably consistent with sustainable development objectives albeit with a significant reservation regarding transport (IR841).

#### *Other considerations*

34. The Secretary of State notes that the appellant has put forward four components of what are referred to as individual very special circumstances. Like the Inspector he considers these should be regarded as 'other considerations' rather than very special circumstances, which cannot be identified until the end of the balancing exercise (IR842).

35. The Secretary of State agrees with the Inspector (IR843) that in terms of the first consideration, '*delivering sustainable economic growth through the appeal scheme to a world-leading business in a priority sector for the UK*', there is a very strong, credible economic case. Turning to the second consideration, '*the absence of a credible and viable alternative*', the Secretary of State agrees with the Inspector that on the basis of the available evidence, the case on this is made out (IR844).

36. In regard to the third consideration, '*the range and scale of the socio-economic and other benefits from the appeal scheme*', the Secretary of State accepts the Inspector's conclusion that although the quantification of the benefits has not been challenged, the degree to which they are delivered would again be dependent on the extent of implementation of the full scheme (IR845).

37. In arriving at the appellant's final consideration '*the harm to the Pinewood Studios Ltd business and the creative industries sector that would arise from a rejection of the appeal proposal*', the Secretary of State agrees with the Inspector's reasoning at IR846, and agrees that in the context of international competition in the film industry, the lost opportunity would represent a harmful outcome of the development not being permitted.

38. The Secretary of State notes that while these four considerations are put forward individually by the appellant, it is clear that they are interrelated and contribute collectively to the supporting case. He agrees with the Inspector that each carries substantial weight, leading in turn to a substantial cumulative weight of considerations in favour of the proposal (IR847).

#### **The Green Belt balance and overall conclusion**

39. The Secretary of State acknowledges that extensive representations both for and against the proposal were made at the inquiry, and among the latter there is understandable scepticism about the appellant's arguments in the context of changes from earlier proposals. However, he agrees with the Inspector that the appeal is to be determined on the basis of the evidence now available and on the particular case (IR848).

40. The Secretary of State agrees with the Inspector that uncertainty relating to the future of the film industry cannot be excluded. He agrees too that risk is a feature of investment decisions, but if future demand for the proposed facilities is not as

expected, and is instead as indicated by the appellant's alternative inflation-only downside case, then the result could be that the full development is not implemented. The Secretary of State acknowledges that the anticipated benefits would then not be realised in full, while the intrusion into Green Belt and harm to the national interest that it represents would be permanent. However, he agrees with the Inspector's conclusion that the evidence indicates a strong likelihood of a level of demand such that it is possible to be satisfied that the permitted development would be taken up (IR849).

41. The Government is firmly committed to both promoting sustainable economic growth and to protecting the Green Belt. In this case the Secretary of State has given very careful consideration to the clear conflict between these aims. In considering the balance between the two national interests the Secretary of State agrees with the Inspector's conclusion at IR850 that, notwithstanding the degree of uncertainty, the potential harm to the Green Belt and the other identified harm is clearly outweighed by the other considerations. He concludes too that the characteristics of the particular site, the relationship to the existing Pinewood Studios, the individual circumstances of the film industry, and the details of the supporting economic case, taken together provide a distinguishing combination of features. Overall, the Secretary of State concludes very special circumstances exist to warrant allowing the inappropriate development, overriding the identified conflict with the development plan.

### **Formal Decision**

42. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. He hereby allows your client's appeal and grants outline planning permission for: *the reconfiguration and expansion of facilities for screen based media, including film, television and video games and associated services and industries, comprising: demolition of existing outdated accommodation; erection of new stages, workshops, office accommodation, demountable modular buildings, entrance structures and reception and security offices, gas CHP energy centre, underground waste water treatment plant, recycling facilities, backlots and film streetscapes; external film production; creation of a new vehicular and pedestrian access from Pinewood Road, a new access from Sevenhills Road for use as both an emergency access and a secondary controlled vehicular access, access roads within the site, surface and multi-level car parking; and associated landscaping and ecological habitat creation works*, in accordance with application ref: 1300175/OUT (amended description) dated 30<sup>th</sup> September 2013, subject to the conditions listed at Annex A of this letter.
43. An applicant for any consent, agreement or approval required by a condition of this permission for agreement of reserved matters has a statutory right of appeal to the Secretary of State if consent, agreement or approval is refused or granted conditionally or if the Local Planning Authority fail to give notice of their decision within the prescribed period.
44. This letter does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than section 57 of the Town and Country Planning Act 1990.

45. This letter serves as the Secretary of State's statement under regulation 24(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

**Right to challenge the decision**

46. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged by making an application to the High Court within six weeks from the date of this letter.

47. A copy of this letter has been sent to South Bucks District Council and 'Stop Project Pinewood'. A notification letter has been sent to all other parties who asked to be informed of the decision.

Yours faithfully

**Julian Pitt**

Authorised by the Secretary of State to sign in that behalf

## CONCLUSIONS

656. The numbers in square brackets in this section of the Report are references to previous paragraphs which are particularly relied upon in reaching the conclusions.

### Main Considerations

657. Having regard to the Council's reasons for refusal of the application, the relevant policy context and the evidence to the inquiry, the main considerations that need to be addressed are as follows:

- i) The impact the proposal would have on the Green Belt, including openness, purposes, the use of land and visual amenity;
- ii) The effect the proposal would have on the Colne Valley Park;
- iii) Whether the development would be sustainable in transport terms;
- iv) The impact the proposal would have on highway conditions;
- v) The merits of the appellant's case for expansion of Pinewood Studios;
- vi) The planning conditions and planning obligations that are required in the event of permission being granted and the likely effectiveness of these with respect to mitigation of impacts on infrastructure and the environment;
- vii) Whether the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify such inappropriate development.

#### **i) The impact the proposal would have on the Green Belt, including openness, purposes, the use of land and visual amenity**

658. The appeal site lies within an area to the west of London where there is extensive designation of land as Metropolitan Green Belt. The site includes the existing Pinewood Studios on the west side of Pinewood Road. The central part of the Studios where its building development is concentrated is excluded from the Green Belt. However, the remainder of the existing Studios site to the north and south of this, and the entirety of the part of the appeal site on the east side of Pinewood Road, are within the Green Belt. The latter area of land is of a similar size to the existing Studios, extending to some 44.5ha. [10,13,76,319]

659. The proposal in the Green Belt of the East Area includes some 72,498sqm of new building development, comprising stages, workshops, offices and other accommodation. Within the West Area, a multi-storey car park and a workshop building are proposed in the Green Belt adjacent to existing buildings, as well some new development within the non-Green Belt part of the existing Studios. [15,16,76,322,325]

660. Paragraph 89 of the National Planning Policy Framework (NPPF) requires the construction of new buildings in the Green Belt to be regarded as inappropriate other than for limited, specified exceptions. There is agreement between all parties that in this respect the proposal amounts to inappropriate development in the Green Belt. According to paragraph 87 of the NPPF, inappropriate development is, by definition, harmful to the Green Belt, and should not be approved except in very special circumstances. [64(12), 76,318,475]

661. Policy GB1 of the South Bucks District Local Plan 1999 takes a similar approach. More specifically, under policy GB4 proposals to establish new

employment generating or other commercial sites or extend the curtilages of existing sites will not be permitted in the Green Belt. The spatial strategy of the South Bucks Core Strategy 2011 aims to protect the Green Belt. The proposal is contrary to these policies of the development plan. [45,55,261,320,368]

662. Paragraph 79 of the NPPF indicates that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

### ***Green Belt openness***

663. The Green Belt land of the East Area is semi-improved grassland and pasture, divided and enclosed by a number of hedges and trees, together with an area of woodland (The Clump). Other than the Saul's Farm buildings in the north corner, it is undeveloped and generally without physical structures. This includes the part historically used for landfill, which blends into the surrounding grassland. In Green Belt terms, the land has the characteristic of openness to a substantial degree. [13,42,322]

664. Although the appeal relates to an outline planning application, considerable information is available on the likely physical form of the proposed development in the East Area. There would be up to 10 new sound stages (2 of which would be workshop/stages) of up to 3,680sqm footprint with ridge heights of up to 21.5m. While smaller in area (but at maximum slightly higher) than the largest existing stage (the '007 Stage'), these would be substantial structures of an industrial/warehouse nature, as illustrated by the existing development of the Studios. There would also be other warehouses and office buildings, parking and circulation areas. Sizeable zones would remain without permanent buildings as backlot space, and such areas are within designated Green Belt on the west side of the road. Parts would also be undeveloped landscaping, especially in the southern fields, and The Clump would be retained. Overall, however, there is no doubt that the existing openness of the East Area land would essentially be lost. [15-20,80-82,322]

665. In the West Area, the proposed multi-storey car park on an existing surface car parking area and the workshop within the existing northern backlot would also erode Green Belt openness. [325]

666. The previous Project Pinewood proposal, dismissed at appeal by the Secretary of State on 19 January 2012, related to the current East Area part of the site. That scheme comprised extensive residential development (1,400 units) and other mixed uses including creative industries floorspace, but no stages. The Secretary of State agreed with the Inspector that the loss of openness from the development would not only be visually apparent, but would all but destroy the concept of the site as part of open Green Belt land. There are considerable differences in the nature of the development now proposed, including that Project Pinewood included relatively dense housing whereas there would be a spread of individual buildings in the current scheme. However, that assessment also validly applies to the present proposal. [39-41,82,323]



### ***Green Belt purposes***

667. Paragraph 80 of the NPPF sets out five purposes served by Green Belt, and the proposal as it relates to the Green Belt falls to be assessed against these.

#### *To check the unrestricted sprawl of large built-up areas*

668. There is agreement that the proposal constitutes a form of urban sprawl that this purpose is seeking to constrain. Iver Heath, together with the central part of the existing Studios excluded from the Green Belt, do not in themselves comprise a large built-up area, but lie between the urban masses of Uxbridge on the edge of London to the east and Slough to the south-west. The Local Plan describes this area as the most seriously fragmented of the Metropolitan Green Belt, and such fragmentation was recognised by the Project Pinewood Inspector. The Local Plan also sets out that the whole of the Green Belt is important in order to keep these larger urban areas in check, and not just those parts of it immediately adjacent to them. The defined and relatively robust nature of the boundaries to the proposal therefore does not negate the additional urban sprawl that would result. [86-87,318-319,327]

#### *To prevent neighbouring towns merging into one another*

669. Conflict with this purpose is also agreed. The development would not in itself result in the merger of towns, but that would rarely be the outcome of any single proposal. Fairly extensive open tracts of Green Belt would remain between settlements. However, that between this part of Iver Heath and other settlements would be reduced, and having regard to the fragmentation of the Green Belt in the area, the conflict with this purpose would be significant. This was the conclusion of the Secretary of State on Project Pinewood. [89-90,328]

#### *To assist in safeguarding the countryside from encroachment*

670. There is agreement that the proposal would be a significant encroachment in this respect. The East Area land is properly regarded as countryside, despite the historic landfill of part and the relatively low-key agricultural use. [13,91,329]

#### *To preserve the setting and special character of historic towns*

671. There is no dispute that this purpose is not relevant to the case. [92]

#### *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*

672. The appellant's contention that there is no conflict with this purpose is based on the argument that the development is geographically fixed with no alternative location or scope for disaggregation. In the context of a similar argument made on Project Pinewood, the Secretary of State agreed with the Inspector that the effect of the proposal was less clear-cut than the assessment on the other purposes. In the absence of specific identified alternatives to the proposal that would involve the recycling of urban land, it is difficult to regard a negative outcome on this purpose as being more clearly established than with Project Pinewood. Conversely, the potential indirect/secondary effects of the scheme would also be uncertain in terms of the nature of land that might benefit from any associated new development, and this factor carries little weight. Overall the proposal cannot be said to materially advance this purpose. [93-95,330,455]

### ***Beneficial use of the Green Belt***

673. According to paragraph 81 of the NPPF, enhancement of the beneficial use of Green Belt should be sought. Examples given are looking for opportunities to provide access and for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

#### *Access, outdoor sport and recreation*

674. There are no existing public footpaths in the East Area, and this is private land without rights of access despite the local use that has been made of it in the past. [13,595]

675. The proposal provides for a network of pedestrian routes through the southern part of the East Area and The Clump woodland, and along the southern and northeast boundaries, which would be for controlled public use. The existing public footpath alongside the M25 is affected by road noise. Although such noise is not unusual in this area of the Green Belt, the proposal would provide a part alternative to this. It would also create a new pedestrian route alongside Sevenhills Road. The footpaths would not be set in open countryside and the nature of the provision would reflect the security requirements of the Studios. In addition, the development is not an essential prerequisite for access to be allowed through permissive paths. Nevertheless, the certainty of provision would be a gain in terms of access and recreation that can be given some weight in favour of the proposal in line with this beneficial use. [24,96-97,331-332]

#### *Biodiversity*

676. The expert evidence, including consultee responses, confirms that the proposal would provide for a net gain in biodiversity within the site and enhanced habitats off-site. This also carries some positive weight. [64(23),98,346]

#### *Damaged and derelict land*

677. Previous restoration of the part of the East Area affected by landfill has taken place. The Project Pinewood Inspector found that the East Area was not damaged or derelict, and there has been no subsequent change in this respect. The proposal would provide no benefit on this matter. [13,333]

#### *Landscapes and visual amenity*

678. The effect of the proposal in relation to landscape and visual amenity overlaps with the effect on Colne Valley Park, which follows below as the second main consideration. Under the current heading the matter is addressed in general Green Belt/landscape terms, with the specific objectives and policies for the Park dealt with below.

679. There is an up-to-date (2011) Landscape Character Assessment for the District. The site falls within a landscape character area identified in this as being one in which the landscape is largely dominated by settlement and existing development, including Pinewood Studios, and with characteristics of discordance and fragmentation. Nevertheless, open views across fields are also a feature which the guidelines in the document seek to maintain, together with

conservation and management of hedgerows within an agriculturally dominant landscape. [104,335,337,341]

680. Consistent with this there are currently open views across the fields of the East Area. These views are especially from around the junction of Sevenhills Road with Pinewood Road at the north-west corner of the site, from the rear of Pinewood Green, and through hedges along Pinewood Road. The latter was confirmed by my site visits, although the degree of visibility will vary on a seasonal basis with the thickness of the vegetation. The views are of open, agricultural type land. [7,336,342]
681. The proposal includes an extensive set of landscaping measures, including substantial ground shaping and tree planting in the East Area. However, the primary purpose of this would be to screen the development. In that respect it seeks to mitigate the impact of the development, and there is no evidence to suggest that the landscaping would represent an enhancement of visual amenity in its own terms. [27,103,334-335]
682. The screening would be by way of bunds up to 5.5m high along sections of the site boundaries together with new planting. Bunding is not characteristic of the area, and the effect of such enclosure would be to reduce the existing open views across fields which the guidelines seek to maintain. This would be particularly so as seen from the north-west corner of the East Area, where the existing low gradient would be replaced by a relatively steep bund with some glimpses of buildings beyond. Along Pinewood Road the existing sky views would be retained, but long views through the boundary hedge would be lost. An erosion of rural character would also result from retained hedgerows no longer being within an agriculturally dominant landscape but largely between developed plots, contrary to the guidelines. In the views in which the proposed buildings would appear, due to their size and nature the development would be perceived as having the character and appearance of a business park, in contrast to the existing undeveloped and open landscape. The new buildings in the Green Belt of the West Area would, with new landscaping, be more satisfactorily assimilated in visual terms due to the existing built context. [100-104,335-344]
683. The appellant's application of established landscape and visual impact assessment methodology is not in dispute. The key test is not the effect of the proposal on the site itself but on the surrounding area. The East Area is relatively well contained within the landscape and the effect on long-distance views would be minimal, with only one such viewpoint identified, from where the development would not easily be perceived. The appellant assesses that the effect of changes in near views would also be limited and in character with the surrounding landscape, leading to a finding of no more than slight adverse impact on landscape and visual amenity. [64(16),100-103,335-344]
684. However, this conclusion reflects an over-emphasis on the existing negative features of the landscape, in particular the effects of built development, and underplays the features of open views and agricultural dominance that the District's Landscape Character Assessment also identifies and seeks to promote. Having regard to this, the outcome would be more than slight adverse, although not as much as the significant adverse contended by the Council, which over-concentrates on the change that there would be within the site itself. Moderate adverse would be a reasonable description of the effect, resulting in conflict with

policy EP3 of the South Bucks Local Plan due to the impact on landscape character. [53,261,368]

### **Conclusion on Green Belt**

685. In addition to harm to the Green Belt by definition as a result of the inappropriate development, the proposal would therefore give rise to Green Belt harm by reason of loss of openness, clear conflict with 3 of the 5 Green Belt purposes, and a moderate adverse effect on landscape and visual amenity. Minor Green Belt benefits would arise from new footpaths and gains to biodiversity.

686. Concern has been expressed about precedent in terms of further proposals that might follow from approval of the appeal development and consequent difficulty of resisting these. Given the unique circumstances of the proposal, and consistent with the conclusion reached in the Project Pinewood case, the weight of policy considerations applicable to proposals for development in the Green Belt would not be diminished should planning permission be granted. [88]

687. Nevertheless, protection of the Green Belt is a national policy objective to which great importance is attached. As part of that, permanence is a key element. There is strong local recognition of the value of Green Belt and objection to the proposal on this ground. Paragraph 88 of the NPPF requires that substantial weight be given to any harm to the Green Belt. While the appellant and the Council identify some differences in their respective approaches to analysing the harm in this case, there is agreement (recorded in the Statement of Common Ground) that the scale of harm arising from the conflict with Green Belt policy is "*substantial and adverse*". That is a fair statement of the position, but it is important also to emphasize the geographical extent of Green Belt land that would be affected. The proposal represents a very large swathe of development in the Green Belt, which would approximately double the area of the existing Pinewood Studios and to a large degree replicate its existing physical form on undeveloped Green Belt land. The harm to the Green Belt in this case, and the conflict with the development plan in that respect, is therefore a matter that should be accorded very serious weight in the decision. [64(13),77-79,271,318-321,324,374-376,571-635]

### **ii) The effect the proposal would have on the Colne Valley Park**

688. The entire site lies within the Colne Valley Park, which is a sub-regional level landscape designation. The Park provides an important area of countryside to the west of London. [64(15),107,347]

689. Core Policy 9 of the South Bucks Core Strategy 2011, which sets out aims for the conservation and enhancement of the landscape characteristics and biodiversity resources of the District, is relevant. As set out above, there would be a net gain to biodiversity, and therefore the objectives of the policy in this respect would be achieved. With regard to landscape character, as also concluded above there would be moderate harm and conflict with the guidelines of the Landscape Character Assessment. The policy allows for exceptions where the harm is outweighed by the importance of the development or the development cannot reasonably be located on an alternative site. As already indicated, that is an assertion in the appellant's case, which will be considered further below under the case for expansion. [47,112-113,118]

690. Core Policy 9 specifically seeks to improve the rural/urban fringe through initiatives in the Colne Valley Park Action Plan. That document is expired, and there is agreement that the proposal should be assessed against the six objectives established by the Colne Valley Park Community Interest Company. This is carried out as follows. [117,119,348]
691. *To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.* With the moderate harm to landscape as set out above, there is material conflict with this objective. [120,348]
692. *To safeguard existing areas of countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.* On the basis of the proposal comprising substantial inappropriate development in the Green Belt, there is significant conflict with this objective. [121,349]
693. *To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features.* The ecological measures in the proposal would meet the aims on biodiversity. [122,350]
694. *To provide opportunities for countryside recreation and ensure that facilities are accessible to all.* This would be achieved by the new permissive paths which, although not in open countryside, would to a large extent be set in the retained open areas of grassland and woodland and outside the parts of the site with new buildings. [123,350]
695. *To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.* While the proposal would create significant employment on the site, and generate off-site supply-chain benefits, it would not form part of the rural economy in terms of a need for or appropriateness of a rural location. The proposal does not therefore gain support from this objective. [124,351]
696. *To encourage community participation, including volunteering and environmental education. To promote the health and social well-being of benefits that access to high quality green spaces brings.* The access improvements would be consistent with this objective. [125,351]
697. In overall terms, the proposed substantial physical development within a large area that is existing countryside would have a significant adverse effect on the Colne Valley Park given the essential countryside protection and enhancement objectives underlying this. This is despite the evidence that there has not been a trend of erosion of compatible uses within the Park, or that some expressed concerns are based on anticipated future large-scale infrastructure developments rather than previous developments. Similarly, the funding contributions made by the appellant towards the Park, while these can be regarded as beneficial to its operation, do not negate the substantial incursion into countryside. [126-129,352]
698. The Inspector in the Project Pinewood appeal noted that, if the positive aspects of the proposal were concluded to clearly outweigh the harm to the Green Belt, then the same considerations would equally apply and outweigh the harm to the Colne Valley Park. That approach is endorsed by the main parties in this case

and can be adopted, and applies similarly to the application of Core Policy 9. In addition, the Council accepts that the negative impacts on landscape and visual amenity that it identifies would not in themselves justify a withholding of permission. Nevertheless, there would be significant harm from the development to the Colne Valley Park. This is to be weighed in the balance, but with the proviso that, to the extent that the harm relates to landscape, it is the same as that identified under Green Belt impact rather than being additional. [109-111,130,261,345,352-353,472]

**iii) Whether the development would be sustainable in transport terms**

699. The Council's reason for refusal on sustainable development grounds focuses on the degree of accessibility of the site. [3,132]

700. The site is located in an area to the west of London that is well served by rail lines and stations, and significant improvements to services will be brought about in particular by the advent of Crossrail in 2019. Evidence shows that workers travel to Pinewood Studios from across an extensive geographical area. This factor, reflecting the particular skills employed, can be expected to continue with the proposal, and apply to the new employment that would be generated at the site. In this respect the general location within an area with such good rail connectivity is beneficial for the potential use of public transport by workers, and also by visitors. [9,141,149,361]

701. However, the site itself is in a semi-rural location which is relatively remote from public transport facilities. The nearest station (Langley) is 5km away. No bus routes pass the site, and the nearest bus stops are 1.2km away. There are no dedicated cycle routes to the nearest stations. The scale of the appeal scheme would generate extensive additional travel. The proposal in this respect does not accord with the objective included in Core Policy 7 of the Core Strategy of focussing new development that generates substantial transport movements in locations that are accessible by public transport, walking and cycling, and is similarly in conflict with Core Policy 10 on employment. [3,46,48,140,156,357,368,513,516]

702. The shortcomings of the location in terms of public transport were identified by the Project Pinewood Inspector. She found that the site is in an "*inherently unsustainable location*", as recognised in the Core Strategy settlement hierarchy. The Secretary of State adopted that description. It was given in the context a proposal for mixed use development which included a substantial residential component, and therefore reflected access to facilities needed by residential occupiers as well as journeys to work. The sustainability of the location for the current proposal falls to be assessed on the basis of the specific development contents and transport-related improvements put forward. [133,136-138,354-355,357]

703. Nevertheless, to the extent that the description reflected the quality of public transport facilities in the near vicinity, it gives a general measure of the nature of the location within a policy framework of seeking more accessible sites for major development.

704. A central part of the appellant's case is that the proposed development is not footloose, in that it can only be located adjacent to the existing Pinewood Studios. This contention is to be considered below in the later examination of the

merits of the case for expansion. However, it can be noted at this stage that no specific potential alternative locations for the development have been put forward, and therefore there are none to provide the basis for a comparison of public transport accessibility with the appeal site. Conversely, little weight can be given to the appellant's argument that the appeal site location is preferable in transport terms to any alternative, in view of the assertion that it would not take place other than here. In addition, there is no firm evidence to support the claimed transport sustainability benefits of a co-location of existing and new facilities on the basis of film making being an integrated process, for example by way of specific information on trip patterns and lengths. In this situation, the relative sustainability of the proposed development at the appeal site by comparison with other possible scenarios, having regard to the requirement of paragraph 34 of the NPPF, cannot effectively be tested. The only matter that can be assessed is the transport sustainability of the proposal in more absolute terms. [155-156,365,455,481]

705. The most recent information indicates that some 87% of existing workers at the Pinewood Studios site travel to it by car (including 5% car share). Only 2% cycle and 1% walk. A combined figure of 8% is given for rail/underground/bus/shuttle bus. The latter element of this is PSL's own free service that has been operating a link with Uxbridge and Slough stations since 2005. This is a valuable provision towards facilitating rail journeys, and with 50,000 trips made by the shuttle bus in 2012 it is a significant contribution to sustainable transport. However, there is some evidence that the number has more recently fallen, or at least not been rising. [140,151,154,359,363,479,487-488]
706. Even without clear comparative examples, the 82% proportion of single car occupancy journeys can be regarded as reflecting a heavy reliance on the private car as opposed to more sustainable modes. PSL's description of the existing modal split as "*encouraging*" in sustainable transport terms is the best that is claimed; the breakdown is not indicative of a site that is well served by public transport. This is irrespective of the on-site facilities that are available to workers. [131,151,154,363,478-480]
707. The proposal puts forward a raft of measures aimed at achieving a sustainable modal shift in association with the new development, comprising both funding for new provision and promotional support including through a Travel Plan. However, the success of these measures is likely to be somewhat limited. Although a relatively large population lives within walking distance, the geographical distribution of the Pinewood Studios workforce suggests that there is little potential for a material increase in the proportion of pedestrian trips. The proposed cycleway provision would make cycling safer and more pleasant, and offers more promise. However, with the relatively low percentage cycling at present despite the numbers living within the cycling catchment area, even a large increase in proportion would not bring about a major change. In addition, the Pinewood Road footway/cycleway is not required to be completed under the planning obligation on this matter until a substantial amount of the new development is occupied. [142,146-147,358,361-362,484-486,647]
708. The proposed shuttle bus improvement, although with a maximum spend limit, offers clearer potential benefits by way of both enhancement of existing routes to

Uxbridge and Slough stations and a new link to Gerrards Cross station.  
[140,148,359-360,487-489]

709. However, the only target put forward on modal shift is a 20% reduction in single car occupancy use by the time the full development has taken place (2033). Even this somewhat modest degree of change, while claimed by the appellant to be achievable, is described as challenging, and therefore there must be doubt about the extent to which its deliverability can be relied upon. Moreover, the target applies only to workers of the new development. Although existing workers could be expected to benefit from the measures, this does not indicate a high degree of confidence in changing existing travel modes.  
[154,365,489,492-495]

710. Consistent with a scenario of continued substantial dependence on car travel is the proposed level of parking provision. While there are sound reasons for seeking to avoid overspill parking in nearby residential roads, the proposal for an increase in existing on-site parking that is proportionate with the scale of development, resulting in a total of 3,000 spaces, does not suggest an effective curtailment of propensity to travel by car. The limitations of public transport and a consequent high dependence on private car travel could also be expected to continue to apply to visitors to large-scale live events that are held at the Studios. [18,157,364,498]

711. The proposed transport measures have been developed in conjunction with the County Council, and are agreed by it to make the proposal sustainable from a transport perspective. However, with the continuing likely dominance of car reliant travel, the proposal cannot be fully considered to amount to a focussing of significant development in a location which is or can be made sustainable as sought by paragraph 17 of the NPPF. The proposed availability of the transport measures to members of the local community would be a welcome contribution to sustainable travel more generally, but there is no evidence on the likely extent to which this would be taken up, and only limited weight can be given to this factor. [66-68,131,134-135,152,156,158,355,365,477,481-482,490-491,496,513,515-516]

712. With around a doubling of the numbers employed at the Studios expected as a result of the proposal, based on the above analysis it would give rise to a substantial increase in journeys reliant on the private car, with a much greater number than the approved Masterplan development. This would be a negative outcome of the proposal, and a matter to be drawn into the overall balance of benefit and harm. [36,139,356,362]

#### **iv) The impact the proposal would have on highway conditions**

713. The Council has no objection to the proposal on traffic grounds, but it is a matter raised by Stop Project Pinewood (SPP) and many local parties. It can be noted, though, that SPP does not argue that traffic impact in itself would warrant resisting the proposal. [3,160,366,473,571-635]

714. The traffic likely to be generated by the development has been appropriately modelled based on surveys of the existing situation and the floorspace increase. This enables an assessment of the impact on junctions in the vicinity after the completion of the development in 2033. [161-162,497]



715. The Five Points Roundabout to the south of the site is a relatively complex junction which currently operates with pressure on capacity. The proposal would bring forward a signalisation scheme for the roundabout which would result in a significant increase in capacity. Permission has been granted for this scheme, and its implementation is the subject of a planning obligation. The modelling includes junction interactions and indicates that the upgrade would provide adequately for the additional traffic that would be generated by the development, even allowing for other new traffic taking advantage of the additional capacity. [22,23,67,164,500,647]
716. Of the other junctions tested, capacity issues arise in relation to the mini-roundabouts along Church Road and Slough Road and at the Wood Lane/Langley Park Road junction to the south of Five Points Roundabout. The analysis of the existing traffic flows shows that congestion occurs at these, as confirmed by local evidence. The appellant's Assessment 2, which adds the development traffic to the baseline, indicates that the proposal would result in additional queuing at peak hours. When an allowance for background traffic growth based on TEMPRO forecasts is made (Assessment 3), a number of junctions would exceed capacity and local congestion would worsen with the proposal. No capacity improvements are proposed for these junctions in association with the development. [164-167,501-503]
717. However, the additions to queuing would be relatively small, and the effects of the development traffic would be restricted to short periods. There is disagreement over whether it is necessary to add in the allowance for future background traffic growth. While there could be developments during the assessment period which are not currently firm proposals, the appellant reasonably points out that those which would generate significant traffic could be expected to be accompanied by their own mitigation. Furthermore, the assessments assume no modal shift away from the private car. Although achievement of the full target on this is not certain, as set out above, the potential for a degree of modal shift adds an element of robustness to the assessment by way of an over-estimate of development traffic. [165-167,499,501-503,507-509]
718. While the current proposal requires assessment on its own merits, it is also relevant to note that, as shown by Assessment 1, it would generate substantially less traffic than the Project Pinewood development. That proposal was not found to be unacceptable on traffic impact grounds. [41,163,504]
719. The planning obligations provide for the option of a secondary staff access on Sevenhills Road were identified traffic thresholds to be reached. The supplementary Transport Assessment on this indicates that, with the accompanying junction improvements at Denham Road and increased use of Sevenhills Road, this would reduce flows on Pinewood Road and Church Road, and in Pinewood Green. [22-23,168]
720. An alternative under the obligation would be funding for traffic management in Pinewood Green. Rat running through this residential area takes place, and the proposal without mitigation is forecast to add around a third extra to this. Although in traffic terms the increased number of vehicles would be modest, the effect in terms of resident sensitivity, even with mitigation, would be reasonably

classified as more than minor, although less than serious. [2,168,505-506,510-512]

721. HGV traffic is of considerable local concern. It is a matter addressed in the Core Strategy, but in relation to certain specific local sites, of which Pinewood Studios is not one. The evidence confirms that the proposal would have only a minor impact in this respect. [169,514,571-635]
722. A further local concern is with regard to parking, and in particular the potential for overspill parking in the surrounding area on occasions of there being insufficient on-site parking to deal with peak demand. The proposed level of provision, with appropriate management of events, would appear to provide the basis for avoiding such unwelcome parking on local residential roads. [18,157,497-498]
723. The County Council regards the proposal as acceptable in traffic terms with the proposed package of obligations and conditions. There is no expert assessment to counter this position. Indeed, as already noted, SPP does not argue that the proposal should be turned down on transport grounds. [67,473]
724. Advice in paragraph 32 of the NPPF is that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe. There is no evidence that the impacts in this case would reach that threshold. However, the addition to local congestion and rat-running would be a moderate harm that falls to be taken into the overall balance. [170-171,505-506]

**v) The merits of the appellant's case for expansion of Pinewood Studios**

725. The proposal, totalling some 109,683sqm net additional accommodation, involves around a doubling of the size of the existing Pinewood Studios, both in term of site area and floorspace. Stage space would account for about just over a quarter of the new floorspace, with most of the remainder divided between workshop and office accommodation. Large stages are the principal component of the scheme. There would be 8 new stages and 2 stage/workshops in the East Area, with 2 further stages in the West Area. In this respect the proposal differs considerably from the Project Pinewood scheme, which included film set streetscapes but no actual new stages. The appellant advises that the additional stage space would enable Pinewood Studios to increase its current capacity of handling 2 big budget productions at any one time to 4. Some flexibility is indicated here by reference also to accommodating high-end television production as well as films. [16-17,39-40,200,202,385,406]
726. The appellant in support of the proposal argues that the new development represents a nationally important element of infrastructure, that there is no alternative to it, and that substantial benefits would flow from the development and, conversely, there would be disbenefits from a withholding of permission. Similar arguments were made in the Project Pinewood case. That may have a bearing on the weight given to some aspects of the supporting case now put forward in the context of differences in the content of the schemes, but the current proposal nevertheless falls to be assessed on its own merits. [192-193,272,385,546,562-563]

### ***Role of Pinewood Studios***

727. As recorded in the Statement of Common Ground (SoCG), there is extensive agreement on the profile and status of Pinewood Studios. The SoCG identifies it as the only production complex of its size, scale and international profile in the UK. It is agreed to be a leading provider of film, television and related services to the global film and television industry, and is ranked in the top three studio facilities in the world. Pinewood Studios has in recent years had a particular prominence in large budget film productions (over \$100m budget). As well as one of the most comprehensive ranges of production facilities on one site, Pinewood Studios offers a collection of related businesses which provide equipment and services to the creative industries. [64(4,5,6),178-180,383,549]
728. It is also common ground that the core film industry makes a substantial contribution to the UK economy, with Pinewood Studios an essential component of this industry. As such there is agreement that Pinewood Studios generates significant economic activity for the UK and has and will continue to be a major contributor to the Government's economic policy objectives. [64(7,8),181]
729. The eminence of Pinewood Studios within the film industry is attested to by a number of letters from major Hollywood film studios and industry bodies, demonstrating a high regard for it as a provider of premium studio space and supporting facilities. Its leading status is echoed in many other representations and statements, and the valuable local economic role it performs is highlighted by the Local Enterprise Partnerships. [175,631,634]
730. The importance of Pinewood Studios is expressly acknowledged in the development plan. Paragraph 10.17 of the South Bucks District Local Plan states that the site is of national and international significance for the production of films, and that the retention of this unique site for film production is extremely desirable. Similarly, paragraphs 1.2.28 and 2.2.23 of the South Bucks Core Strategy recognise the national and international importance of Pinewood Studios as a location for film and television production. [50,52]

### ***National policy on the economy and the film industry***

731. Key statements of Government policy, both in written and spoken form, attach great significance to the delivery of sustainable economic growth. In terms of the translation of this into planning policy, the NPPF identifies the important role that planning should play in supporting economic development and growth. Paragraphs 17, 19, 20 and 21 in particular have been referred to in this respect. [60-61,182,193,263]
732. In addition, the National Infrastructure Plan 2013 highlights the importance of infrastructure to growth. [192]
733. The relationship of these economic objectives with Green Belt policy, and the balance to be struck in a particular case, will be considered below in the final concluding section of the Report. [320,371,517-519]
734. More specifically in relation to the UK film, television and screen-based creative industries, the SoCG notes that policy for these is set collectively across several Government departments including HM Treasury, the Department for Business, Innovation and Skills and the Department for Culture, Media and Sport. Again, a range of relevant reports, speeches and statements is identified. There

is no dispute that the thrust of the policy framework is to attach high importance to the creative industries, and specifically film, to the economy. In quantitative terms it can be noted that the overall contribution of the industry to UK GDP, employment and tax revenues for the year 2011 was: (a) a total of 117,400 FTE jobs; (b) a contribution of over £4.6 billion to UK GDP; and (c) a contribution of over £1.3 billion to the Exchequer (gross). [62-63,64(7),182-191,264-265,378-379]

735. In summary, the collective policy has the objective of attracting film and television production to the UK and encouraging the development of the UK film and television industry. A key aspect is the use of a favourable tax incentive regime to attract inward investment. The long-standing incentives relating to film production have recently been extended to what is known as high-end television. The Autumn Statement of 2013 emphasises the importance of the creative industries as an industrial sector offering significant growth opportunities. Adjustments have been made to film tax relief to increase the attraction of the UK and additional funding is in place for the National Film and Television School, with skills provision an important element of the support. [183-186,190-191,254]

736. The locational dimension of the film-industry policy, including with respect to the Green Belt, is again left for later consideration in the Report.

### **Capacity**

737. That there is a current capacity issue in the UK film industry, specifically in terms of a shortage of studio stage space to meet present demands for film and high-end television production, does not appear to be in contention. [194,383]

738. Indeed, the Council states explicitly that it is no part of its case to dispute the need for additional capacity to service the film and television industry. In this context it argues that it has actively encouraged development at Pinewood Studios to enable it to compete in its international market, with the planning permission granted for the Masterplan in 2006 and subsequent developments referred to in that respect. [36-38,383]

739. The existing pressure on stage space capacity is substantiated by a range of evidence. There are a number of film industry letters from major film-makers who are the main users of Pinewood Studios referring to difficulty in securing facilities. The British Film Commission and Film London as authoritative bodies make reference to business being lost from the UK as a result of inadequate production space. In addition, the operational evidence of the appellant indicates the degree to which the existing facilities at Pinewood Studios are occupied to what can reasonably be regarded as full capacity. The House of Commons Culture, Media and Sport Committee recently noted that a lack of studio space is already resulting in the loss of international inward investment, and the Government's response to its report acknowledges this concern and the importance of addressing it. The overall picture of such pressure on capacity is convincing. [174-175,183-184,190,194-195,202,387,540]

740. In spite of its acceptance of a current capacity issue, the Council nevertheless questions the extent of this. It correctly points out that none of the sources of evidence referred to above quantify the degree of shortfall. There is also no quantified target for additional studio space set out in Government policy. In

relation to the capacity specifically of Pinewood Studios, it also reasonably argues that the multiple booking of future productions, put forward as an indicator of excessive demand, appears to be a normal business practice. Further, it is fairly noted that the Project Pinewood scheme, containing no stage space, was pursued at a time when Pinewood Studios was similarly operating at stage space capacity, implying that this was not then assessed as a critical issue. [373,382,385,387-388]

741. The Council goes on to suggest that there may be around one big budget film a year presently being lost to the UK for capacity reasons. The anecdotal nature of the evidence does not enable a firm view to be reached on the accuracy of this estimate of the current situation, although no other estimate has been put forward. [195,390]

742. However, it is clear that the appeal scheme is intended to provide additional capacity for the longer-term rather than simply respond to a short-term situation. Thus, the appellant advocates it as a desirable alternative to a 'hand-to-mouth' incremental approach that makes use only of the existing Pinewood Studios site. The proposed development has an anticipated 15 year delivery timescale commencing in 2015, with substantial ground works to take place before any new stage space would be completed. The need for capacity that the proposal seeks to address is therefore one which it is contended by the appellant would arise in the longer term, and the scheme is not put forward just to deal with an existing immediate pressure on facilities. [27,31-32,247,292,304,384,391]

743. On the Project Pinewood proposal, the Secretary of State, agreeing with the Inspector, found that there was an absence of tangible data or evidence of demand for the streetscapes included within that scheme. The appellant, in the light of that background, states that the importance of providing a robust evidence base in support of the current proposal has been recognised. Although it appears that the Pinewood Board determined the basic scale of the proposal prior to the receipt of specialist business advice, the case now put forward by the appellant is underpinned by relevant analysis, and it falls to be assessed based on that evidence. [201,386,565]

744. The appellant's quantification of future demand for studio and related floorspace and the potential benefits of this is now examined in that context.

### ***The appellant's analysis***

745. The appellant's analysis is essentially in two parts. The first is an assessment of UK film production expenditure growth over the period 2012-2032 (by PricewaterhouseCoopers). The second is a translation of this projected growth into a quantification of requirements for space (by Amion). [173]

746. There are separate growth projections based on three different scenarios. The first is an 'inflation only case', in which growth is at a long-term estimate of inflation. This would require no increase in studio capacity. The appellant regards this scenario as highly unlikely given historic growth rates. [205]

747. In the second, growth is based on trends in broader entertainment and media spending growth. The appellant treats this as the 'base case' on which it is said the highest degree of confidence can be placed. In real terms (2013 prices) total UK production expenditure is predicted to grow by £699million, an increase of

62% over the 20 year period. This is translated into a demand for an additional 74,296sqm of stage floorspace, with a further demand for an additional 111,444sqm of ancillary space (including workshops and production offices). This leads to a total projected demand of around 186,000sqm of additional production-related space (stage and ancillary). [205,215,224-226]

748. The third scenario is a '17% UK market share case', in which UK-produced productions increase their share of global film box office receipts from 14% to 17%. The appellant regards this scenario as representing an outcome at an upper end of a range of reasonable assumptions. Under it, total UK production expenditure would grow by £1,062 million (94%) by 2032, requiring a total additional production-related floorspace of 282,000sqm (112,879sqm stage space and 169,318sqm ancillary space). [205,213,215,224-226]

749. A further part of the appellant's case is an assessment of the economic and employment benefits expected to flow from the development. These are (at 2012 prices): private sector investment of some £194million; some 3,100 net additional jobs at the national level including multiplier and other wider effects; £149m net additional GVA per annum at UK level; net additional contributions to the Exchequer of £36m; net additional exports of £37m. More generally, it is argued that the proposal would help to ensure that Pinewood Studios remains one of the premier global studio brands, and contribute substantially to the continued success and growth of the UK's creative industries, a key driver in the Government's Plan for Growth. [227]

750. Criticisms have been made of various aspects of the appellant's analysis, with associated doubts raised by the critics about the reliability of the projections which underlie the proposal. These are now considered under relevant sub-headings.

#### *Uncertainty and the value of long-term projections*

751. The first matter to deal with relates to the general value of longer term projections of the film-production industry given its particular nature. As indicated by the first step of the appellant's analysis, involving a review of historical UK film production expenditure, there is a significant year on year variation in this, driven largely by the particular timing of filming schedules for big budget films. Expenditure is dominated by a relatively small number of such films, which are critical to overall film production expenditure in the UK. These involve inward investment, which is essentially governed by decisions of the major Hollywood studios. [207,417-418,430,432,520-523,537-538,558-559]

752. In this context attention is also drawn by critics to the apparent shifts in the appellant's own expectations of future demand, having regard to the promotion of the 2006 Masterplan and subsequent modified proposals and the absence of new stage space in the Project Pinewood scheme. [384-386,435-437]

753. The Council's written evidence included the suggestion that, in these circumstances, any projection beyond a 5-year horizon should be rejected or substantially discounted. However, large-scale capital investment projects are dependent on financial returns over a long period. As such they require a view to be taken on likely demand levels some time into the future, as recognised in the National Infrastructure Plan. The Council's submissions finalised its position on this point as advocating a need for very considerable caution in attaching any

significant weight to projections of demand beyond 2020. Determining the weight to be attached to such projections is a reasonable approach, rather than simply rejecting the use of long-term projections because of uncertainty. Clearly the time period and uncertainty involved will affect the degree of confidence that can be placed on projections to 2032, but the exercise of assessing long-term future demand has essential value in capital project planning.  
[192,222,242,244,383-385,394,435-437]

*Calculation of the base year figure*

754. The base year expenditure figure for the projections (attributed to the starting point of 2013) uses a four-year average drawn over the period 2009-2012. These four years include both a peak figure (2011) and the following year of 2012 with a substantially lower expenditure level. Although criticised as being too short a span, the four year average provides a reasonable foundation for a base figure given the record of underlying growth over a long period and year-on-year fluctuations within that. [209,426-428]

*Relationship between GDP, E&M spend and film production expenditure*

755. The appellant's top-down modelling approach derives projections for overall market growth, before disaggregating into more specific components of the market. The disaggregation assumes that the relationships between GDP, Entertainment and Media (E&M) spend and film production remain stable over the projection period. The appellant regards this as a reasonable assumption, primarily due to the strong historical relationships between these variables.  
[204,219]

756. No specific criticism has been made of the assumed rates of global and UK GDP growth, which are derived from well-established sources. In addition, no reasoned objection appears to have been raised to the projections of total E&M spending based on the historic relationship between this and GDP growth. This includes with respect to the appellant's downward adjustment of 0.5 percent to allow for historical growth in both UK and global E&M spending being slightly below the equivalent growth rate of nominal GDP. [207,210]

757. Strong criticisms, however, have been made of the assumptions regarding the filmed entertainment spending share of total E&M spending. The share averaged around 6% at global and 7.5% at UK level between 2000 and 2011. The appellant acknowledges that these shares are currently trending downwards as other forms of media entertainment out-grow film, but argues that some faster growing media types such as video games require studio facilities and so are likely to contribute to future studio based production expenditure. A downward adjustment of 0.5 percent was made to the historical average of filmed entertainment as a share of total E&M spending for use in the long-term projections. While in practice this share is expected to vary on a yearly basis, as particular forms of media gain and lose popularity, the appellant considers that over the longer term it is reasonable to assume that the share is constant.  
[211,393,395]

758. The criticisms identify a number of areas of uncertainty in this respect.

759. There is no firm evidence to corroborate the appellant's assumption that video games and other media types will make up for a declining share of filmed

entertainment and require studio facilities in the same way. The precise effects that digitisation is likely to have on the industry are hard to predict. In this respect the appellant explicitly acknowledges a further assumption that there will be no major technological development that fundamentally changes the way in which films are produced. In support of this it is argued that technological developments in the film industry in the recent past have had greater impact on the distribution and consumption of film than on its production. [211,221,256,396]

760. A number of relevant considerations that could affect the reliance on this assumption have been referred to. The Hollywood Studio model has traditionally given the producers of films a high degree of control over the means of distribution as well as production. A loss of control over distribution as a result of digital delivery and the potential detriment to income of producers in this respect could have unknown effects on film production spending growth. Fair parallels with the substantial effects of distribution changes on the print and music sectors have been drawn. The potential impact of piracy at an international level as a significant threat to profitability is also an unknown. [397-404,521-523]
761. Another notable current change involves new forms of production and distribution with an emphasis on speed of production and consumer access. Such technologically driven models, especially linked to the internet, are unlikely to involve the budgets and studio requirements of traditional films. The historic closure of many film studios at the time of the introduction of television has been cited as a previous episode of change associated with technological development. [400-403,534]
762. As well as the potential effects of these new developments on traditional Hollywood studios, their model of film production itself is subject to evident pressures. The unpredictable fortunes of individual big-budget films at the box office is not a new matter. However, current concerns about budgets, constraints on launch dates/release windows, and competition within the market are potential factors that could limit future expansion of production expenditure. While the information available from the studios is anecdotal in this respect, it supports that there is pressure on budgets and does not provide any firm indication of an increasing number of blockbuster films, with no guaranteed pipeline of such films. There is also evidence of funding constraints on middle budget films (\$30-49.9m). [414-423,525-528,533,537,560]
763. Set against these uncertainties in the film sector, there is clear evidence of growth in high-end television production, although there is some doubt about the assumed contribution of this to overall growth in the appellant's analysis and the degree to which it requires premium studio facilities. The potential for expansion in film production internationally, with China in particular cited, provides support for production expenditure growth at global level. [183,194,251-253,259,406,408,412,425,527-528]
764. Turning specifically to the UK share of production expenditure growth, a further assumption acknowledged by the appellant is that both this (and Pinewood Studios' share of the UK market) will remain stable over the projection period, with the UK maintaining its existing share in the base case. The appellant recognises a possibility that global investment in both facilities and other film production requirements will outpace the UK and therefore present a risk of loss



- of market share to the UK. However, it is argued that the UK film production industry has demonstrated strong growth over a long period, and that a range of competitive drivers are favourable for the UK. [220]
765. Countering this confidence is that the UK is relatively exposed to big budget film productions given the degree to which these contribute to inward investment, which is the major share of total expenditure. There is therefore a risk factor associated with the future prospects of such productions, with Pinewood Studios seemingly exposed in this respect based on its existing and assumed continuing business profile. [429-430,436,536-540]
766. However, tax incentives appear to be secure, and have also been extended to high-end television productions. These incentives have played an important role in attracting inward investment and can be expected to do so in the future. This is particularly so given the recognised skills base available in the UK which is also an evident attraction. Uncertainty arising from exchange rate fluctuation appears to be only a minor factor in affecting inward investment. The recent co-production treaty with China provides evidence of the scope for the future prospects for the UK share of global expenditure to be reinforced by expansion into new markets, even as a two-way exchange. [186,254-255,259,301-302,378,408,531-532]
767. Extensive development of new studios is taking place in many countries, including by the Pinewood Group. However, the base case projections allow for the growth of foreign studios as the international market expands, with only the upside projection providing for a relative increase in the UK market share (from 14% to 17%). In addition, such global investment demonstrates an international confidence in film production expenditure growth. [213-214,220,243,429,530]
768. Taken overall, a number of uncertainties in relation to future film expenditure have been identified, which generally have been acknowledged by the appellant. There has been no attempt to specifically quantify the potential individual effects of these factors, which is not surprising given their evolving and interactive nature. The difficulty of modelling the variables provides methodological support for the logic of the appellant's top-down approach to projections. [204,422]
769. Nevertheless, in the face of the uncertainties, the question is the degree to which the appellant's projections derived from a top-down assessment can be regarded as robust. Supporting that they are, it can be noted that the 2013-2032 average projected growth rates under both the base case (5.1%) and the 17% market share case (6.1%) are significantly less than the recent average historical growth rate of 9.6% (2002-2011). For the base case, it is also below the average growth rate for the period 2002-2012 of 5.3%, which included the materially lower level of production in 2012. These figures also substantiate the appellant's view of the inflation-only case as a very conservative scenario, and it can be regarded as one which provides a reasonable encompassment of downside risks. [205,217,407,431-434,522,535]
770. In addition, the reasonableness of the appellant's forecasts has been endorsed through independent expert assessments. Specifically, these comprise a review carried out for the Council at application stage by Gina Fegan; one by Hasan Bakhshi which was commissioned by the appellant as part of the appeal; and a third review by the Research and Statistics Unit of the British Film Institute, referred to in its appeal representation. There is no questioning by the Council of

the authority and relevant expertise of these reviewers. In summary they advise that the appellant's forecasts provide a fair assessment of likely future performance, which takes into account the risks arising from uncertainty. While seemingly optimistic, the appellant's assumptions are confirmed as providing a reasonable basis for a realistic base case forecast. Although the sources of uncertainty have been well articulated in the cases of the Council, SPP and others, there is no alternative countervailing quantitative assessment. Overall, the base case projection of future expenditure growth can be given considerable weight. [229-236,377,393,396,405,411,429,434,464,522,535,544]

#### *Translation of expenditure growth to stage space and ancillary space*

##### Stage space

771. Following preparation of the expenditure growth projections, the appellant has assessed the additional stage space requirements expected to arise from the additional UK expenditure. The calculation involves applying the percentage increase in film production expenditure over the period 2013-2032 to the combined floorspace of the existing 12 UK studios that are able to accommodate major film making. From this are derived estimates of the additional floorspace required. [224,438]
772. Studio costs (excluding set construction) are generally between just 4% and 6% of total film production spend. The appellant's calculation assumes a fixed relationship between studio costs and total expenditure, so that demand for this rises by the same proportion. It is suggested in criticism that price sensitivity and budget restraints would require an increase in efficiency of use of studio space over the projection period. Nevertheless, there is no evidence of such a change in the relationship. [228,439-441]
773. High-end television does not necessarily require premium stage space of the type that is proposed in the appeal scheme. There is evidence of the current use of cheaper facilities, including space built for other purposes that is converted to studios. It is also not established that video games making has extensive stage space requirements. These factors lead to some reservations about the likely reliability of the appellant's stage space demand projections. [409-412,541-542]

##### Ancillary space

774. Demand for additional ancillary space (including workshops and production offices) in the appellant's analysis is derived by applying what is said to be the existing ratio of stage to ancillary space at Pinewood Studios of 1:1.5 to the stage floorspace projections. [225]
775. While individual film productions may require less than this ratio of provision, a sound point is made by the appellant that the needs of overlapping productions warrant the higher level, with evidence on occupation to support this. Nevertheless, reasonable doubts have been raised about the application of the fixed ratio to the entire projection period to 2032. There may well be scope for a more efficient model, as suggested by some evidence from new international studios, and especially in the context of pressure on budgets. [442-446,558]
776. Taking into account all of the above aspects of the conversion of the expenditure projections into floorspace requirements, it appears that the appellant's analysis makes no allowance for a varied outcome on the lower side.

777. However, an important point is that the appeal proposal (stage plus ancillary space) would provide for only some 38% of the required new capacity as calculated by the appellant under the base case (25% under the 17% market share case). If the base case projection is accepted as a fair reflection of the likely growth, this adds a significant robustness to the floorspace demand conversion, since under this the scheme would accommodate only a limited portion of the available national growth. As explored below, there is little by way of identified firm alternatives to the appeal scheme to provide for substantial new premium stage space. There would therefore be scope for considerable variation in the outcome of overall demand for new production space with there still being a requirement for that in the appeal scheme. In the base case it is assumed that Pinewood Studios would retain its existing share of big budget film productions in the UK (around 35%), with this share increasing only in the 17% share case. [225-226]

778. Conversely, it should be noted that under the inflation-only projection there would be no requirement for an increase in studio capacity, but a need only for existing capacity to be maintained. This can be regarded as a reasonable representation of downside risks with the proposal. In this respect attention is again drawn to the independent analyses, which endorse the appellant's base case as a realistic forecast of likely future demand. [205,229-236]

#### *Media Hub*

779. The existing combined office and workshop floorspace at Pinewood Studios is around 71,921sqm (43,586sqm + 28,335sqm), which is more than double the existing stage space (32,360sqm). This clearly exceeds the ratio of 1:1.5 for stage to ancillary space which is said to presently exist. The balance is accounted for by what is described as the Media Hub, referred to in the Statement of Common Ground as a collection of related businesses which provide equipment and services to the creative industries. The existing floorspace figure given by the appellant for the Media Hub is 24,922sqm. Deducting this from the total office/workshop space (to leave 46,999sqm) gives a ratio of stage space to offices/workshops of some 1:1.45. [11,64(5),225,445]

780. The above calculated figures of requirements for additional floorspace including ancillary space that would result from the growth projections are stated by the appellant not to include the additional floorspace required to accommodate businesses providing services to productions. The latter equate to Media Hub type businesses. The appellant asserts that it is likely there would be a substantial increase in demand for floorspace for these based on the other projections. [226]

781. No UK requirement figure is produced for this, but the proposal makes provision within the development for additional floorspace to accommodate Media Hub businesses. The appellant's information variously quantifies the extent of this as both 20,875sqm and 23,434sqm. The total combined office and workshop floorspace after the development of 134,979sqm would again be around just more than double the stage space of 63,451sqm<sup>864</sup>, and the ratio of stage to

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<sup>864</sup> Figures from CD16 drawing no P-P-004 Issue 0h (134,979sqm total is 77,531sqm office + 57,448sqm warehouse)

ancillary space after deducting the Media Hub total from the latter<sup>865</sup> would be 1:1.4 or 1:1.37. In effect the proposal would approximately carry forward the existing ratios, with the Media Hub increased in proportion to its existing size. [16-17,445]

782. The explanation given for the inconsistency in the appellant's information is that the Media Hub floorspace would be flexible in terms of an overlap with the use of offices and workshops for immediate production purposes. As now, businesses would not be fixed in location but move around to meet the demands of particular productions and accommodate them in the most appropriate locations. Thus, in the proposed development, whilst new buildings 1.01, 1.07 (in the West Area) and, in particular, 2.30 and 2.31 (in the East Area) might seem the most obvious to be occupied by Media Hub tenants due to their relative remoteness from stages, that would not necessarily define the geographical location of the Media Hub. It is argued that there is not a clear distinction between production space and Media Hub space, but it is intended that all of the development would be subject to a restriction by condition to media use. [293-297,447-450]

783. The availability of Media Hub businesses at Pinewood Studios is evidently a valued aspect of its overall offer and seen as part of its attraction to film makers, as indicated by the various industry letters. However, there has been no modelling of likely future demand for Media Hub floorspace, other than an assumption that it should grow in proportion with the Studios and reference to a waiting list of potential occupiers. [180,200,451]

784. In addition, the degree to which it is essential for Media Hub businesses to be located at Pinewood Studios has reasonably been questioned. The evidence of the Pinewood group's own promotion of services located separately at its Pinewood and other studios, and the geographical spread of the supplier base of Pinewood Studios across London and the South East, are relevant points strongly suggesting that co-location is not essential for all potential occupiers. The inclusion of a similar facility in a proposal for expansion of Leavesden Studios is not in itself a justification for the extent of accommodation proposed in the appeal scheme. [258,297,451-454]

785. There is therefore a weakness in the appellant's justification for the extent of non-stage floorspace included in the proposal. However, the new Media Hub floorspace is limited to around 20% of the total net floorspace of the development. In addition, about 45% of the additional office floorspace proposed within the development would be sited within the West Area outside the Green Belt.<sup>866</sup> Therefore, even if the questioning of the expansion of the Media Hub is agreed with to its fullest extent such that none of the expansion is regarded as properly justified, this relates only to a limited proportion of the overall proposed development within the Green Belt. A more measured assessment is that, with the clear benefits of the Media Hub to the overall functioning of Pinewood Studios and the additional demand for on-site facilities that it can be anticipated would arise from the new studio space, at least some expansion of it is warranted as an integral part of the overall development. [10,13,16,17,64(5,6),180,200,451]

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<sup>865</sup> 134,979sqm less 45,797sqm or 48,356sqm to give 89,182sqm or 86,623sqm

<sup>866</sup> 14,239sqm of the total of 31,964sqm net office increase

### *Economic benefits*

786. It is common ground that the appeal development has the potential to deliver a significant range of economic benefits at national, regional and local levels, in accordance with Government policy for sustainable economic growth and the screen-based creative industries, including skills training. Further, it is agreed that a number of the objectives of the Local Enterprise Partnership fully support the appeal proposal, including stimulating sustainable business growth and bringing forward business-critical infrastructure. [64(10,11),464]
787. The appellant's quantification of the benefits has been outlined above. There is no evidence to counter the assessment. However, delivery of the benefits to this level is dependent on full implementation and occupation of the proposed development. [227,464]

### *Alternatives*

788. As agreed in the Statement of Common Ground, and already referred to, Pinewood Studios is the only production complex of its size, scale and international profile in the UK. It can readily be accepted that its global high reputation would add particular value to an extension of facilities through a physical expansion of the existing site, thereby assisting in the continuing attraction of the UK to inward film investment. Thus there is credibility in this respect in the appellant's assertion that Pinewood Studios is the natural focus of expansion within the industry. [64(4,6),197]
789. However, the appellant goes further. It is argued that the proposal is not footloose, but must be located at Pinewood Studios, such that there is no alternative. As a point of principle, that proposition is not consistent with the existing distribution of studio facilities in the UK. Pinewood Studios is not the only location where big-budget inward investment films are made, indeed large-scale and successful facilities exist at the Pinewood group's own Shepperton Studios, as well as at Leavesden and Longcross. Pinewood Studios has only 36% of the UK's major film stages, although being the single most important concentration. [179,214,247,459,549]
790. It therefore is not the case that the potential for additional big-budget film studio capacity in the UK is locationally restricted to Pinewood Studios. In addition, the evidence of film making on split sites, and of the use of alternative spaces such as redundant warehouses, while there may be particular reasons for this in individual cases and these options will generally not be preferred, indicates that there is some flexibility in spatial and physical requirements. [245-246,285-286,409-410,456-458,540-542,561]
791. However, with the identified capacity requirement to a great extent relating to the capturing of big-budget inward investment film production growth, it is reasonable for the consideration of alternatives to focus on those options able to provide a concentration of premium facilities. The assessment of alternatives carried out by the appellant contains specific criteria on scale of production capability and existence of on-site production infrastructure. These are realistic requirements in terms of a need to achieve a critical mass of facilities and supporting services. A deliverability criterion is also warranted to test whether the provision could actually be achieved. [281]

792. The final criterion in the appellant's assessment is a location within the West London studio cluster. The existing four major studio sites in the UK are all within this general area. In the Project Pinewood appeal the Inspector concluded that the main screen industry cluster is concentrated in London and the South East, of which Pinewood Studios is one of a number of smaller scale agglomerations. In that context the appellant's current identification of a Greater West London Film cluster with Pinewood as the main hub is disputed. Notwithstanding this debate, the evidence supports that the supplier base of Pinewood Studios shows a particular focus across London and the South East. The Secretary of State for Business, Innovation and Skills has identified the role of existing centres of excellence and supply chain clustering as strong influences on future growth in the sector. In this context, the focus on options within the area of search is reasonable, having regard also to the clear link of existing skills to the success in attracting inward investment. [175,188-190,281,452-454]
793. The appellant's assessment concludes that there is no alternative to the appeal proposal. While exploring the potential of alternatives in its evidence, the Council's submissions expressly record that it is advancing no specific alternative sites that could accommodate the scale and mix of the proposal. It is notable that no other party has brought forward a credible alternative. On the contrary, many representations express strong support for the scheme in general or on the particular site. This includes support from bodies that are concerned with promoting the film industry in Scotland and Northern Ireland. No serious regional policy case on the basis of a need to spread investment across the UK has been made against the proposal. [175,248,286,455,541,631,633-634 ]
794. It is of course to be recognised that the appellant's alternatives assessment is based on achieving the scale of provision proposed in the appeal scheme. The base case for the future capacity requirement has been accepted as realistic above, such that the search restriction to alternatives that would make a substantial contribution towards meeting that requirement is justified. Although some reservation has been expressed about the case for the entire Media Hub content, that represents a relatively limited proportion of the overall development. Clearly, were there to be more substantial doubt about the scale of additional capacity needed, that would affect the weight given to the alternatives assessment. [456,540,544,554]
795. Under the base case there is considerable potential for additional studio facilities elsewhere in the UK as well as the appeal proposal, including for television production and making use of buildings originally developed for other purposes. It is noted above that, if the appellant's calculation of requirements is accepted, the appeal scheme would capture only a minority proportion of this. [226,409-410,458,541-542]
796. A particular matter to consider is the scope for additional development within the existing Pinewood Studios site. The Statement of Common Ground identifies that there is 55,115sqm (net) of undeveloped committed floorspace under the 2006 Masterplan planning permission. Within the constraints of a tightly developed operational studios site, construction work can obviously be disruptive. Nevertheless, the recent construction of the South Dock (Q) and Richard Attenborough Stages has shown that substantial development can successfully be undertaken, and that the longer term benefits of new facilities can outweigh the

short term disruption. Policy E2 of the Local Plan supports such use of the site. [38,52,287,466]

797. However, the appellant's detailed analysis of all the remaining sites/plots of the Masterplan permission indicates strong limitations in what could still be provided under this. In particular, most of the residual floorspace comprises approved multi-storey office buildings with a built form that would be unsuitable for large stages. The lease granted to Panalux, an important company engaged in film production, provides an understandable justification for the appellant not proceeding with the development of the part of the site it occupies to provide an approved stage. [250,289-290,448]
798. The appeal scheme itself proposes 26,532sqm of floorspace on the West Area (excluding the multi-storey car park and overlapping with the sites of the residual Masterplan approvals). This could provide up to a maximum of 4,894sqm of stage space (4,645sqm expected). The Council suggests that there is potential for significant additional stage space with some adjustment to the proposal. However, there has been no appraisal of the achievable scale of this to counter the appellant's more detailed conclusions on the constraints of the West Area. Although the Gina Fegan review suggests that sufficient capacity to handle capacity for the next 5-10 years could be provided, there is no firm assessment of what the West Area could accommodate other than the appeal evidence. Whether or not further development within the existing Studios site would amount to an incremental approach, the Council accepts that not all of the floorspace of the appeal proposal could be provided on the West Area. [16,288-291,383,465-467]
799. To conclude on alternatives, there are various options for new studio development in the UK to meet future requirements for existing capacity, including on the existing Pinewood Studios site. However, based on the available evidence, there is no identifiable alternative to the appeal site that could provide an equivalent development of premium studio facilities of the nature and scale of the proposal. If the need for such an extent of development is not accepted, this alternatives assessment will carry less weight.

### ***Conclusions on the case for expansion***

800. Pinewood Studios has a leading global status, and is an essential component of the UK film industry, which makes a substantial contribution to the UK economy. Government policy seeks sustainable economic growth, and as part of this attaches high importance to the creative industries and specifically film.
801. The proposal would approximately double the existing Pinewood Studios in terms of size and capacity. There is a widely acknowledged current shortage in UK studio capacity, with strong industry support for the proposal. In addition to this, the proposal is backed by a proper business assessment of future requirements. The appellant's analysis takes a long-term view which is appropriate for major capital project investment. Under the base case projection there would be substantial growth in film production expenditure by 2032.
802. The top-down methodology makes a number of explicit assumptions, and there are uncertainties in these respects that potentially bear on the weight that can be given to the base case forecast. These particularly relate to the specific nature of the film industry and unknowns regarding the future of the traditional

Hollywood film model, which is a key element in UK inward investment film production expenditure, and such factors as digitisation and the studio requirements of television production. The shifting nature of development proposals brought forward by the appellant is indicative of changing expectations of future requirements. Nevertheless, the base case projection appears to be robust, having regard to long term trends and its endorsement in independent assessments. It can be regarded as the most likely future outcome based on current best information, carrying substantial weight. The inflation-only case provides an appropriate representation of the downside risks.

803. In terms of the translation to stage space requirements, there are some reasonable reservations about this element of the appellant's analysis, in particular with regard to high-end television and the scope for efficiencies in the use of ancillary space. However, there is a further considerable degree of robustness in that the proposal would provide for only 38% of the projected UK floorspace requirement under the base case. On the risk side, under the inflation-only case there would be no requirement for additional floorspace.
804. There is some weakness in the justification for the Media Hub expansion, but the qualitative benefits of this are convincing, and it relates only to a limited part of the proposal within the Green Belt.
805. The proposal would deliver substantial economic benefits if implemented and occupied in full.
806. Alternatives have been reasonably considered by the appellant. There is no firm evidence to undermine the conclusion that there is no identifiable alternative site that could accommodate the scale and nature of the appeal proposal, although options for a lesser provision of new studio space exist.
807. Overall there is a very strong, credible economic case for the proposed expansion. While recognising that there is a degree of risk arising from uncertainty, the case is sufficiently compelling to be given substantial weight in support of the development.

**vi) The planning conditions and planning obligations that are required in the event of permission being granted and the likely effectiveness of these with respect to mitigation of impacts on infrastructure and the environment**

***Conditions***

808. Suggested conditions to be imposed on a grant of permission were put forward and discussed at the inquiry. There was a large measure of agreement on these, but also differing views on some matters. The conditions fall to be considered against the advice in national planning guidance and the model conditions in Circular 11/95. Taking into account that advice and the views expressed on the proposed conditions, and the above conclusions, a set of amended conditions that are recommended in the event of the appeal being allowed is included in an Annex. [636-639]
809. A number of minor detailed changes to the suggested conditions have been made to improve the wording. A justification for the conditions is now set out under the headings of the groups into which the recommended conditions are arranged.



### *Time Limits, Periods and Plans*

810. Conditions appropriate to an outline permission are required. In view of the scale of the development it is reasonable for details to be brought forward for different parts in steps. However, control over certain site-wide matters at the initial step, and ensuring inclusion of a significant element of the approved floorspace, are warranted to mitigate the impact of the development and reflect the very special circumstances case. Although, with the proposed cross-site works, the development does not divide into distinct parcels, the approach of an indicative phasing which allows for some flexibility is an agreed matter. The proposal is intended to be delivered over a 15 year period reflecting the anticipated growth in demand over that time. In these circumstances, some control over a programme of delivery, with scope for this to be reviewed as the development progresses, is justified; the wording of Conditions 2 and 5 has been adjusted to ensure that there is no development prior to approval of the programme in the interests of enforceability and clarity. The time periods accord with the early initial delivery in the context of the very special circumstances case. [31,32,64(3),637]

811. The submitted plans should be incorporated in the permission so that this is consistent with the scheme assessed.

### *Materials and Tree Protection*

812. These aspects of the development should be controlled to ensure that its appearance and landscape impact are satisfactory.

### *Energy centre*

813. Requirements on the energy centre are necessary in the interests of sustainable development.

### *Ecological Management and Monitoring*

814. Requirements on ecology to secure the application supporting details are needed in order to safeguard biodiversity with appropriate protection and mitigation measures.

### *Drainage and Ground Contamination*

815. These conditions, again reflecting the submitted assessments, are necessary to protect the environment of the site and surrounding area.

### *External Lighting*

816. Control over lighting is needed to safeguard the amenity of the area.

### *Archaeology and Building Recording*

817. Requirements on these matters are necessary to protect heritage interest as identified in the submitted assessments.

### *Construction Management*

818. The proposal is for a development of substantial scale and a number of requirements relating to construction management are justified to minimise impact on the surrounding area. However, there is no evidential basis on which

to warrant a condition to control construction traffic routing, and the suggestions of the County Council in this respect are not included. [639]

### *Highways*

819. A number of conditions on access are needed to safeguard highway conditions.

### *User Occupation*

820. Requirements relating to uses of external areas within the site are needed to safeguard amenity and the environment.

821. A general limitation on occupation of the development for media related uses is justified having regard to the very special circumstances case. The evidence relating to the Media Hub does not warrant the specification of a maximum floorspace for this, having regard to the likely flexibility of occupation in serving the varying requirements of film productions and the difficulty of enforcing such a restriction. Any future proposals for further development would need to be assessed on their own merits. [638]

### ***Obligations***

822. The NPPF sets out policy tests for the seeking of planning obligations, and there are similar statutory tests contained in Regulation 122 of the Community Infrastructure Levy Regulations (2010) which must be met for obligations to be given weight. Core Policy 6 of the Core Strategy on providing for local infrastructure needs is also relevant. The submitted obligations have been considered in the light of these requirements and the joint evidence put forward in support of them. [640-655]

823. The obligations in the first legal agreement, involving the District Council, all relate to local labour and skills training. Economic benefits, including to the local area, are an important element of the very special circumstances case, and the use of local labour would reduce the need for travel in line with sustainable transport objectives.

824. The second legal agreement, involving the County Council, contains a number of obligations relating to transport matters. These divide into those intended to secure delivery of off-site highway works, and others directed towards sustainable transport measures. The obligations are required to help mitigate the impacts of the development in line with national transport policy objectives, as well as local ones set out in policy TR5 of the Local Plan and Core Policy 7 of the Core Strategy. Footpath provision within the site would help meet objectives for the use of land in the Green Belt and the Colne Valley Park.

825. Other obligations in the second agreement deal with ecological matters. These are needed to secure biodiversity interests, consistent with Core Policy 9 and national policy.

826. All of the above obligations meet the tests of being necessary, directly related to the development and fairly and reasonably related to it, and therefore can be given weight in support of the proposal.

### ***Infrastructure and environmental effects***

827. The Statement of Common Ground records agreement that, subject to conditions and obligations, the proposal is acceptable in terms of a range of amenity, environmental and heritage impacts. The Council expressly raises no infrastructure objections to the development on the same basis. The above conditions and obligations deal satisfactorily with these matters. [64,65,266,366]

828. The Statement of Common Ground also notes that the Environmental Statement meets relevant requirements. The submitted environmental information can be regarded as adequate to enable assessment of the likely significant environmental effects of the proposal. [64(1)]

### **vii) Whether the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify such inappropriate development**

#### ***Summary of harm***

##### *Green Belt harm*

829. The proposal is inappropriate development in the Green Belt. In addition to harm to the Green Belt by definition, it would give rise to further Green Belt harm by reason of a large-scale intrusion on openness, clear conflict with 3 of the 5 Green Belt purposes, and a moderate adverse effect on landscape and visual amenity. Minor Green Belt benefits would arise from new footpaths and gains to biodiversity.

830. Precedent is not a reason for rejecting the proposal, but it would have a substantial and adverse effect on the Green Belt, and the sheer geographical extent of the proposed development in the Green Belt is to be borne in mind. The proposal is in clear conflict with policies GB1, GB4 and EP3 of the South Bucks District Local Plan in these respects. The Green Belt harm is a matter that should be accorded very serious weight in the decision.

##### *Colne Valley Park harm*

831. The proposed substantial physical development within a large area that is existing countryside would have a significant adverse effect on the Colne Valley Park. The negative impacts on landscape and visual amenity would not in themselves justify withholding permission, but there would nevertheless be significant harm from the development to the Colne Valley Park.

832. In these respects there would be conflict with Core Policy 9 of the South Bucks Core Strategy. The policy allows for exceptions where the harm is outweighed by the importance of the development or the development cannot reasonably be located on an alternative site, so that this is a matter to be taken into the overall balance. This is also with the proviso that, to the extent that the harm relates to landscape, it is the same harm as that identified under Green Belt impact rather than being additional.

### *Sustainable transport harm*

833. The site is located within an area that is generally well served by public transport, with significant future improvements to services imminent. However, the site itself is relatively remote from public transport facilities. The scale of the appeal scheme would generate extensive additional travel. The proposal in this respect does not accord with the objective included in Core Policy 7 of the Core Strategy of focussing new development that generates substantial transport movements in locations that are accessible by public transport, walking and cycling.
834. The existing modal split of travel to the site shows a heavy reliance on the private car. The proposal puts forward a raft of measures aimed at achieving a sustainable modal shift, which have been developed in conjunction with the County Council, but the success of these is likely to be somewhat limited, with a continued substantial dependence on car travel. In the absence of comparisons, the relative sustainability of the development on this site cannot properly be tested. However, in absolute terms it can be expected that the proposal would give rise to a substantial increase in journeys reliant on the private car, which is a negative outcome.

### *Traffic harm*

835. The likely traffic impact of the proposal has been properly modelled. The County Council regards the proposal as acceptable in traffic terms with the proposed package of obligations and conditions, and no objection is raised on this ground by the District Council. Although there is considerable local concern about traffic, the effect in terms of local congestion and additional rat-running would be limited. It would not in itself justify turning down the proposal, but would be a moderately harmful impact.

### ***Development Plan position***

836. The relevant elements of the development plan comprise the South Bucks Local Development Framework Core Strategy Development Plan Document 2011 and the South Bucks District Local Plan 1999 (saved version). The proposal is in conflict with a number of up-to-date policies in the development plan as set out above. While there are many other policy areas where no conflict has been identified, the proposal is overall not in accordance with the development plan. [43-59,64,261-262,266,367-369]

### ***National policy position***

837. The NPPF highlights the importance of achieving sustainable development, with the Government's view of what this means in practice set out by the policies in paragraphs 18 to 219 taken as a whole. Given that the proposal constitutes inappropriate development in the Green Belt, which is contrary to an up-to-date development plan and can only be approved on the basis of very special circumstances, the provisions for applying a presumption in favour of sustainable development in decision-taking set out in paragraph 14 do not apply in this case. Nevertheless, given the goal of sustainable development, the performance of the proposal in this respect is a matter to be addressed, dealing with the economic, social and environmental roles of the planning system in this. [268-270,369-370]

838. The design and technical aspects of the development would meet sustainability criteria, and a gain in biodiversity would be delivered. The incursion into Green Belt and loss of undeveloped land would be a negative environmental effect. There would also be an adverse social impact with respect to the concern expressed in widespread local objection to such an intrusion. Conversely, with the recognised cultural contribution made by Pinewood Studios and the film industry, it can be considered that there would be a boost to this which would be a positive social aspect of the expansion. [266-267,299,475,571-635]
839. The proposal does not fully represent a focussing of significant development in a location which is or can be made sustainable as sought by paragraph 17 of the NPPF. The extent to which it would give rise to an increase in journeys reliant on the private car would be a negative outcome. However, an increased demand for travel is a general consequence of new development.
840. In terms more specifically of the economic dimension of sustainable development, there is a strong national commitment to economic growth and support for the film industry. The potential economic benefits of the proposal would contribute significantly to these national objectives. However, there is no general dispensation for economic development to override the Government's continuing firm commitment to Green Belt protection. There is also no such provision for the film industry in particular, with the support for this not quantified or location specific in terms of new studios development. The requirement for very special circumstances to be established remains applicable for any exception to be made. [320,371-373,378-379,518-519]
841. Subject to such very special circumstances being accepted, including a requirement for the proposal to be in the particular location of the appeal site, it can be concluded that the proposal would be reasonably consistent with sustainable development objectives but with a significant reservation on transport.

### ***Other considerations***

842. The appellant has put forward four components of what are referred to as individual very special circumstances, and the Council has responded on a similar basis. The NPPF states that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. These components should therefore be regarded as 'other considerations' rather than very special circumstances, which cannot be identified until the end of the balancing exercise. [271-272,461]
843. The first consideration is "*delivering sustainable economic growth through the appeal scheme to a world-leading business in a priority sector for the UK*". This relates to the merits of the case for expansion of Pinewood Studios, as explored above, with the conclusion reached that there is a very strong, credible economic case. In the context of Government policy, this consideration can properly be described as one of national interest. It could be expected that a grant of permission for the scheme would provide a widely reported message in support of this interest. [273-278,379,465,550-559]
844. The second consideration is "*the absence of a credible and viable alternative*". On the basis of the available evidence, the case on this is made out. The point is

reiterated that this is with the premise that the full extent of the development is needed in pursuit of the national interest. [279-298,465-467]

845. The third consideration is "*the range and scale of the socio-economic and other benefits from the appeal scheme*". These would arise at both a local and national level, and include those relating to education, skills and culture. The quantification of the benefits has not been challenged, but the degree to which they are delivered would again be dependent on the extent of implementation of the full scheme. [299-302,464]

846. The final consideration is "*the harm to the PSL business and the creative industries sector that would arise from a rejection of the appeal proposal*". The interests of the PSL business and the overall sector do not directly coincide, and the business does not equate to the UK film industry as a whole. The appellant's assertion that in the event of permission not being forthcoming for the appeal scheme it would cap its investment at Pinewood Studios was not sustained at the inquiry. There would be scope for further development within the existing site, and inward film investment could be expected to continue. There could be some adverse effect from negative publicity, but it is difficult to gauge the likely extent of this or how long it would last, and the reputation of the Pinewood brand would remain an asset. However, without the appeal scheme the benefits identified under the first and third considerations would not be realised to the degree possible with the proposed development. In the context of international competition in the film industry, the lost opportunity would represent a harmful outcome of the development not being permitted. [64(9),303-306,465,548-549,569]

847. While these four considerations are put forward individually by the appellant, it is clear that they are interrelated and contribute collectively to the supporting case. On the basis of the above assessment each carries substantial weight, leading in turn to a substantial cumulative weight of considerations in favour of the proposal. [307-309,460-461]

### ***The Green Belt balance***

848. There are extensive representations both for and against the proposal. Among the latter there is understandable scepticism about the appellant's arguments in the context of changes from earlier proposals. However, the appeal is to be determined on the basis of the evidence now available and on the particular case. The Green Belt balancing exercise is a matter of judgement on which different views can legitimately be reached. It can be noted that the officer report on the planning application to the Council's Planning Committee made no recommendation on the decision but indicated that the balance could be struck either way. The test, however, is for the harm to be clearly outweighed, rather than being achieved on a marginal basis.

849. The proposal can be regarded as an ambitious scheme with a 15 year implementation timescale. Uncertainty relating to the future of the film industry cannot be excluded. Risk is a feature of investment decisions, but if future demand for the proposed facilities is not as expected, and is instead as indicated by the appellant's alternative inflation-only downside case, the result could be that the full development is not implemented. The anticipated benefits would then not be realised in full, while the intrusion into Green Belt and harm to the national interest that it represents would be permanent. However, the evidence

indicates a strong likelihood of a level of demand such that it is possible to be satisfied that the permitted development would be taken up. [376,297,380,462]

850. In drawing the balance between the two national interests, I consider that, notwithstanding the degree of uncertainty, the potential harm to the Green Belt and the other identified harm is clearly outweighed by the other considerations. The characteristics of the particular site, the relationship to the existing Pinewood Studios, the individual circumstances of the film industry, and the details of the supporting economic case, taken together provide a distinguishing combination of features. Overall, very special circumstances exist to warrant allowing the inappropriate development, overriding the identified conflict with the development plan.

#### **RECOMMENDATION**

851. That the appeal be allowed and planning permission be granted subject to the conditions set out in the attached Annex.

*T G Phillimore*

INSPECTOR

## **ANNEX: RECOMMENDED CONDITIONS**

### *Time Limits, Periods and Plans*

- 1) No part of the development hereby permitted shall be begun until details of the appearance, landscaping, layout, scale and internal access of that part (hereinafter referred to as the "reserved matters") have been submitted to, and approved in writing by, the local planning authority. The development shall not be carried out otherwise than in accordance with the approved details.
- 2) The first application for approval of reserved matters shall be made to the local planning authority no later than 2 years from the date of this permission and shall include details of the following:
  - a) major distributor roads/routes within the site, including vehicular access;
  - b) strategic foul and surface water features within the site;
  - c) structural landscaping/planting provisions within the site;
  - d) ecological mitigation and management measures as set out in conditions 11 and 12;
  - e) the site entrance junction/roundabout to be formed with Pinewood Road and the access to be formed with Sevenhills Road;
  - f) ground works including site profiling and the formation of perimeter bunds within the site;
  - g) stage floorspace of at least 12,090sqm (gross external area), workshop floorspace of at least 12,407sqm (gross external area) and office floorspace of at least 15,905sqm (gross external area); and
  - h) a programme ("Programme") which sets out the proposed order of construction of the matters listed at a) - g) above and all of the new stage, workshop, office and other floorspace hereby permitted, for the entirety of the application site.

All such details shall accord with the parameter plans listed in condition 4. No part of the development hereby permitted shall be begun prior to approval of all of these details. Development shall be begun before the expiration of 1 year from the date of the approval of the last of the details to be approved pursuant to this condition and shall be carried out in accordance with the approved details.

- 3) Application for approval of the last of the reserved matters shall be made to the local planning authority before the expiration of 10 years from the date of this permission.
- 4) The development hereby permitted shall accord with the approved parameter plans and drawings comprising:
  - P-B-000/0h - Application Site Boundary
  - P-B-001/0h - Existing Site Plan
  - P-B-002/0h - Baseline Plan
  - P-A-001/0a - Proposed Demolitions
  - P-A-002-1 - Tree Removal Plan 1
  - P-A-002-2 - Tree Removal Plan 2
  - P-A-002-3 - Tree Removal Plan 3



- P-A-003/D - Site Access: Pinewood Road Main Entrance Plan
- P-A-004/E - Site Access: Sevenhills Road Emergency and Secondary Controlled Vehicular Access Plan
- P-P-001/0h - Green Space Parameters
- P-P-002/0h - Landscape and Ecology Parameters
- P-P-003/0h - Development Zones and Level Parameters
- P-P-004/0h - Areas by Development Zone Parameters
- P-P-005/0i - Site Access and Circulation Parameters
- P-P-006/0h - Building Plot Parameters
- P-P-007/1 - Areas and Dimensions by Plot Parameters

- 5) An up-to-date Programme shall be maintained at all stages of the development hereby permitted and shall accompany each application for reserved matters approval that is submitted pursuant to this permission. Those subsequent parts shall not commence until the Programme has been approved and the development shall thereafter be carried out in accordance with the approved up-to-date Programme.

#### *Materials*

- 6) No part of the development hereby permitted shall be begun until a schedule of the materials to be used in the external elevations of the building(s) within that part has been submitted to, and approved in writing by, the local planning authority. The development shall thereafter be carried out in accordance with the approved schedule.

#### *Tree Protection*

- 7) No part of the development hereby permitted shall be begun until an arboricultural method statement, tree constraints plan and tree protection plan in relation to that part has been submitted to, and approved in writing by, the local planning authority. The submitted details shall accord with the BS:5837 (as current) and shall include:
- a) plans showing the trees to be removed, identified by number;
  - b) plans showing trees to be retained, identified by number, with canopies plotted;
  - c) details identifying root protection areas of retained trees within, adjacent to, or which overhang the site;
  - d) the precise location and design details for the erection of protective tree barriers and any other physical protection measures; and
  - e) a method statement in relation to construction operations.

The development shall thereafter be carried out in accordance with the approved details.

- 8) No part of the development hereby permitted shall be begun until fencing for the protection of any retained tree within, adjacent to or which overhangs that part has been erected in accordance with details previously approved in writing by the local planning authority. The fencing shall be retained for the duration of the construction period of that part of the development until all equipment, materials and surplus materials have been removed from that part. Nothing shall be stored or placed in any fenced area approved in accordance

with this condition and the ground levels within those areas shall not be altered, nor shall any excavations be made without the written consent of the local planning authority.

- 9) No part of the development hereby permitted shall be begun until details of the position and proposed depth of excavation trenches for all services (including cables, pipes, surface water drains, foul water drains and public utilities) within that part (together with their means of installation which pass underneath the canopy of any retained tree within, adjacent to or which overhangs that part) have been submitted to, and approved in writing by, the local planning authority. The development shall thereafter be carried out in accordance with the approved details.

#### *Energy Centre*

- 10) No part of the development hereby permitted shall be occupied until details of the energy centre, as shown on the Building Plots Parameter Plan P-P-006/0h (together with a programme for its implementation) have been submitted to, and approved in writing by, the local planning authority. The energy centre shall thereafter be completed in accordance with the approved details and programme.

#### *Ecological Management and Monitoring*

- 11) The first reserved matters application submitted pursuant to condition 2 shall include an ecological management plan in respect of the site covering a period of not less than 25 years. The ecological management plan shall:
- a) include details of public access, acid grassland, lighting, reptile habitat, protection and translocation, bats and the construction of green roofs;
  - b) incorporate the matters listed in: (i) section 8.9, paragraph 644 (including the proposals for mitigation in table 8.22 and table 8.24); (ii) section 4.3.2 of appendix 8.3; and (iii) section 4.3 of appendix 6 of the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted;
  - c) include details of the creation and management of the embedded ecology measures set out in: (i) the Ecology Strategy dated February 2013; (ii) section 8.2 of the Environmental Statement; and (iii) plan 004/P1, all as submitted in support of the development hereby permitted;
  - d) include details of mitigation, creation and management of habitats within the site prior to, during and post construction of the development hereby permitted;
  - e) provide for the creation of all habitats as early as possible so as to minimise the time lag between construction of the development hereby permitted and the creation of replacement habitat;
  - f) require the updating of surveys of all species, which are identified as requiring protection, no later than 12 months prior to commencement of the works within each part of the development, as detailed in section 8.9, paragraph 639 of the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted;
  - g) require the annual review of the ecological management plan to reflect any changes in baseline conditions or the establishment of habitats, to be submitted to and approved in writing by the local planning authority;

- h) require the provision of remedial measures if monitoring indicates that the effects of the development hereby permitted on protected and BAP species are greater than predicted in the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted;
- i) require the annual submission of protected species records, collated during construction and monitoring surveys, to the local Environmental Record Centre;
- j) include details of the construction method, planting scheme and management of green roofs and details and location of any features installed for invertebrates;
- k) include details of: (i) the specification and location of bat boxes and insect hotels; and (ii) the creation and location of hibernacula created for reptiles, all as proposed in section 8.9, paragraph 637 of the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted;
- l) include details of the reptile translocation strategy including details of proposed receptor sites and their suitability and ability to support additional reptiles;
- m) include the location and specification of nest boxes proposed in section 8.9, paragraph 646 of the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted; and
- n) a programme for implementation.

No development hereby permitted shall be begun until the ecological management plan has been submitted to, and approved in writing by, the local planning authority. The development shall thereafter be carried out in accordance with the approved ecological management plan.

- 12) The first reserved matters application submitted pursuant to condition 2 shall include an ecological monitoring plan in respect of the site. The ecological monitoring plan shall include a regime for monitoring the impacts of those species and habitats identified as being important, including the time period over which such monitoring will occur, as detailed in section 8.9 (paragraphs 640 to 642) of the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted. No development hereby permitted shall be begun until the ecological monitoring plan has been submitted to, and approved in writing by, the local planning authority. The development hereby permitted shall thereafter be carried out and managed in accordance with the approved ecological monitoring plan.
- 13) No clearance of bird breeding habitat in preparation for (or during the course of) the construction of any part of the development hereby permitted shall take place during the bird nesting season from March to August inclusive, unless a nesting bird survey has been submitted to and approved in writing by the local planning authority to establish whether that part of the site is being used for bird nesting. Should the survey reveal the presence of any nesting species then no development shall take place within that part of the site during the period specified above.

### *Drainage*

- 14) The first reserved matters application submitted pursuant to condition 2 shall include details of a surface water sustainable drainage scheme in respect of the site. The scheme shall: (i) be based on the Flood Risk Assessment dated January 2013 revised April 2013 (as submitted in support of the development hereby permitted); (ii) include a programme for its implementation; and (iii) restrict surface water run-off to greenfield discharge rates for all areas of the site that are currently undeveloped and where existing buildings and areas of hard-standing are to be demolished and replaced, together with arrangements for on-site surface water storage. The development hereby permitted shall thereafter be carried out in accordance with the approved details and programme.
- 15) Surface water drainage in respect of the development hereby permitted shall not be permitted to infiltrate into the ground other than with the express written consent of the local planning authority (which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters).

### *Ground Contamination*

- 16) No part of the development hereby permitted shall be begun until supplementary contamination ground investigation surveys for that part (as specified at paragraph 839 of the Environmental Statement dated February 2013) have been carried out to ascertain the presence of any contaminants on or under the surface of that part of the site and to determine its potential for the pollution of the water environment. The survey details shall include measures to prevent pollution of ground water and surface water, including provisions for monitoring. No part of the development hereby permitted shall be begun until the surveys, together with any necessary remedial works to render that part of the site fit for occupation, have been submitted to, and approved in writing by, the local planning authority. The development hereby permitted shall thereafter be carried out in accordance with the approved measures, which shall thereafter be retained.
- 17) No part of the approved backlot within the East Area of the development hereby permitted shall be used until an environmental management procedure (as specified in paragraphs 842 and 843 of the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted) has been submitted to, and approved in writing by, the local planning authority. The objectives of the procedure shall be to ensure that:
  - a) activities carried out on the backlot area do not pose a risk of harm to users arising from landfill gas emissions; and
  - b) temporary construction on the area does not affect the integrity of the clay cap or perimeter containment of the underlying landfill cells.

The environmental management procedure shall include: (i) a risk assessment of all proposed activities within the backlot area; (ii) details of a prior approval procedure (to be undertaken by the applicant) for all construction activities in the area; (iii) auditing for compliance with permitted activities and ensuring that all site users are briefed before using the backlot. The use and operation of the backlot area shall thereafter be carried out in accordance with the approved environmental management procedure.

### *External Lighting*

- 18) No part of the development hereby permitted shall be occupied until details of all external lighting proposals for that part have been submitted to, and approved in writing, by the local planning authority. All external lighting proposals shall comply with: (i) the lighting mitigation measures included in section 14.8 of the Environmental Statement dated February 2013; and (ii) the ecological mitigation measures set out at paragraph 645 of the Environmental Statement dated February 2013. No part of the development hereby permitted shall be occupied otherwise than in accordance with the approved details.
- 19) The main beam angles of all external lighting units within the development hereby permitted shall be below 70° from vertical. Light trespass received at the boundary of the development hereby permitted with residential properties shall be no more than a maximum of 5 lux m<sup>2</sup>.

### *Archaeology and Building Recording*

- 20) No part of the development hereby permitted in the vicinity of: (i) Fields F1 and F2 in the East Area; and (ii) Heatherden Hall in the West Area shall be begun until details of an archaeological watching brief for that part have been submitted to, and approved in writing by, the local planning authority. The development hereby permitted shall thereafter be carried out in accordance with the approved details.
- 21) No demolition works hereby permitted shall be carried out within the site until a photographic record of the buildings listed in table 10.8 of the Environmental Statement dated February 2013, and shown on the approved Demolition Plan P-A-001/0a, has been submitted to and approved in writing by the local planning authority. The record shall accord with a Level 1 Survey as specified in the English Heritage guidance '*Understanding Historic Buildings*' 2006.

### *Construction Management*

- 22) No part of the development hereby permitted shall be begun until a Code of Construction Practice and Management Plan for that part has been submitted to, and approved in writing by, the local planning authority. The Code of Construction Practice and Management Plan shall include:
- a) site supervision arrangements and procedures;
  - b) details of construction method statements, working practices and environmental and health and safety protection measures;
  - c) details of construction working hours;
  - d) operation of construction plant and machinery and the implementation of noise and vibration mitigation measures in accordance with paragraphs 1472 to 1476 and 1481 of the Environmental Statement dated February 2013 as submitted in support of the development hereby permitted;
  - e) details and use of construction lighting to be carried out in accordance with the mitigation listed in table 14.5 and at paragraph 1681 of the Environmental Statement dated February 2013;
  - f) arrangements for the protection of areas of ecological sensitivity and importance in accordance with the mitigation set out at paragraphs 634 to 645 of the Environmental Statement dated February 2013 (and in

accordance with the ecological management plan and ecological monitoring plan as approved pursuant to conditions 11 and 12;

- g) methods for the control of dust and air pollution in accordance with the dust mitigation measures listed in paragraphs 410 and 411 of the Environmental Statement dated February 2013;
- h) methods for the protection of landscape features and visual receptors in accordance the measures set out at paragraph 1201 of the Environmental Statement dated February 2013;
- i) methods for the prevention of dust, dirt, debris and other deposits on the highway;
- j) methods for the management of materials and prevention of waste in accordance with the sustainable waste management principles listed at paragraph 1995 of the Environmental Statement dated February 2013; and
- k) details of construction site compounds, the location and storage of plant, materials and fuel, access arrangements and security hoardings.

The development shall thereafter be carried out in accordance with the approved Code and Management Plan.

- 23) No part of the development hereby permitted shall be begun until a site waste management plan for that part (including a scheme for recycling and/or disposing of waste resulting from demolition and construction works) has been submitted to, and approved in writing by, the local planning authority. The development hereby permitted shall thereafter be carried out in accordance with the approved management plan.
- 24) No part of the development hereby permitted shall be begun until a construction traffic management plan (including details of vehicle parking for site operatives and visitors, wheel washing arrangements and plant and materials delivery/despatch times) for that part has been submitted to, and approved in writing by, the local planning authority. The development hereby permitted shall thereafter be carried out in accordance with the approved management plan.

#### *Highways*

- 25) No part of the development hereby permitted shall be occupied until the highway works, which are shown in principle on drawing number P-A-003/D (including speed gates relocation, roundabout access and a Toucan crossing) have been completed and are available for use in accordance with details that have previously been approved in writing by the local planning authority.
- 26) No part of the development hereby permitted shall be occupied until the highway works, which are shown in principle on drawing number P-A-004/E (including a secure commercial emergency vehicular access), have been completed and are available for use in accordance with details that have previously been approved in writing by the local planning authority.
- 27) Notwithstanding the provisions of Part 2 of the Second Schedule to the Town and Country Planning (General Permitted Development) Order 1995) or any Order revoking or re-enacting that Order) no gates, fences, walls or other means of enclosure other than those shown on the approved plans shall be erected along the frontage to the site within 18 metres of the carriageway.

*User Occupation*

- 28) Prior to the first use of the external areas and land within the site to be used for outdoor filming, a management and operational plan for those parts of the site shall be submitted to, and approved in writing by, the local planning authority. The plan shall include details of the management and mitigation of the impacts of outdoor filming (including noise disturbance, artificial lighting and parking and access requirements on adjacent residents, the landscape and ecology within the site). The plan shall also include reference to:
- a) the noise mitigation and local liaison measures listed at paragraphs 1487 to 1489 of the Environmental Statement dated February 2013; and
  - b) the potential effect of filming activities on ground nesting bird habitats and the mitigation measures at paragraph 645 of the Environmental Statement dated February 2013.

No external areas and land within the site shall be used for outdoor filming otherwise than in accordance with the approved plan at all times.

- 29) The development hereby permitted shall be used only for uses directly connected with media, including film, television and video games production, and associated services and industries.

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