



## Strategic Sites Committee agenda

Date: Thursday 16 February 2023

Time: 2.00 pm

Venue: The Oculus, Buckinghamshire Council, Gatehouse Road, Aylesbury HP19 8FF

### Membership:

A Bond, P Cooper, T Egleton, P Fealey, S Lewin, N Marshall, R Newcombe, J Ng, M Rand, A Turner (Chairman), J Waters (Vice-Chairman) and A Wheelhouse

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<b>Agenda Item</b>	<b>Page No</b>
<b>1 Apologies for absence</b>	
<b>2 Minutes</b> To agree the minutes of the Strategic Sites Committee meeting held on 19 January 2023.	<b>3 - 6</b>
<b>3 Declarations of interest</b>	
<b>4 PL/22/2657/FA - Land South of Pinewood Studios and Alderbourne Farm, Pinewood Road, Iver Heath, SLO 0NU</b>	<b>7 - 324</b>

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## Strategic Sites Committee minutes

Minutes of the meeting of the Strategic Sites Committee held on Thursday 19 January 2023 in The Oculus, Buckinghamshire Council, Gatehouse Road, Aylesbury HP19 8FF, commencing at 1.01 pm and concluding at 4.15 pm.

### Members present

A Bond, P Cooper, P Fealey, S Lewin, N Marshall, R Newcombe, J Ng, M Rand, A Turner (Chairman), J Waters (Vice-Chairman) and A Wheelhouse

### Agenda Item

#### 1 Apologies for absence

Apologies for absence were received from Councillor Trevor Egleton.

#### 2 Minutes

**Resolved:** The minutes of the meeting held on 24 November 2022 were **agreed** as an accurate record and were signed by the Chairman.

#### 3 Declarations of interest

Councillor Richard Newcombe declared a personal interest in item 6, application 22/06487/OUT, as he represented Buckinghamshire Council on the Chilterns Conservation Board which was responsible for the area of outstanding natural beauty (AONB). There was mention of the AONB in the report, notwithstanding the fact that it did not form part of the AONB.

#### 4 **22/07012/FUL - 30 - 34 Oxford Road, High Wycombe, Buckinghamshire, HP11 2EN**

Proposal: Demolition of existing buildings on land at 30 - 34 Oxford Road and construction of seven storey further education building for Buckinghamshire College Group (6,618m<sup>2</sup>) to house the main College campus, with general teaching (maths/science/IT and networking etc.) and light practical teaching (arts/performing arts/ sciences) with associated works including retention of vehicular access off Bridge Street, provision of rear service area with 3 x car parking spaces for minibuses, drop off area, cycle parking, bin store and services shed, hard and soft landscaping.

A site visit was carried out on 16 January 2023.

Speaking on behalf of the application, Jenny Craig.

It was proposed by Councillor Jonathan Waters and seconded by Councillor Newcombe and agreed at a vote.

**Resolved:** that the application be delegated and deferred to the Service Director of Planning and Environment for **approval** subject to the satisfactory completion of a legal agreement or Memorandum of Understanding (if the Council own the site at the time of completion of the agreement) to secure a travel plan (including monitoring payments) or if this is not achieved then the application be refused for such reasons as the Service Director of Planning and Environment considers appropriate and subject to the planning conditions set out in the report.

**5 22/07013/FUL - KMS House, Brook Street, High Wycombe, Buckinghamshire, HP11 2EQ**

Proposal: Demolition of existing buildings at Brook Street and construction of two storey further education building for vocational teaching and learning (1,581m<sup>2</sup>) to accommodate the Colleges construction and automotive curriculum.

A site visit was carried out on 16 January 2023.

Speaking on behalf of the agent, Peter Marsh.

It was proposed by Councillor Patrick Fealey and seconded by Councillor Ashley Bond and agreed at a vote.

**Resolved:** that the application be delegated and deferred to the Service Director of Planning and Environment for **approval** subject to the satisfactory completion of a legal agreement or Memorandum of Understanding (if the Council own the site at the time of completion of the agreement) to secure a travel plan (including monitoring payments) or if this is not achieved then the application be refused for such reasons as the Service Director of Planning and Environment considers appropriate and subject to the planning conditions set out in the report.

*Note 1: A comfort break was taken from 14.27 to 14.35.*

**6 22/06487/OUT - Amersham and Wycombe College, Spring Lane, Flackwell Heath, Buckinghamshire, HP10 9HE**

Proposal: Outline application (including details of access, appearance, layout and scale) for demolition of existing Buckinghamshire College Campus (Amersham and Wycombe College) to provide up to 67 residential dwellings, car parking to serve adjoining sports pitches, hard and soft landscaping with other associated works.

A site visit was carried out on 16 January 2023.

Rebecca Jarratt, Senior Planner, advised that there were further updates to the conditions in addition to those listed in the update report as follows:

- Condition 5 after paragraph D: Sentence added, 'The development shall be carried out in accordance with the approved phasing plan'.
- Condition 14 currently reads: 'The development shall not begin until details of the adoptable estate roads and footways..... It was proposed that the word 'adoptable' be removed and add 'which shall be designed and constructed to an adoptable standard' after the word 'footways',.
- Condition 27: to be amended to add 'notwithstanding the provisions of the General Permitted Development Order, the buildings shown to be retained as a day nursery shall be retained as such and shall be used for no other purpose, including any other use falling within the use Class E'.
- Condition 39: The wording of the last sentence to be amended to read 'The approved scheme shall be subsequently implemented and used to support an application for a European Protected Species Licence from Natural England.'

A statement was read out on behalf of the ward member, Councillor David Watson, by Sally Taylor, Senior Democratic Services Officer.

Speaking as a representative of Chepping Wycombe Parish Council, Councillor Alec Barron.

Speaking on behalf of the applicant, John McGrath.

It was proposed by Councillor Patrick Fealey and seconded by Councillor Jonathan Waters and agreed at a vote.

**Resolved:** that the application be delegated to the Service Director of Planning and Environment for **approval** subject to the satisfactory completion of a legal agreement to secure the obligations listed in the report and subject to the conditions listed in the report and update report and the further amendments to conditions 5, 14, 27 and 39. If this is not achieved then the application be refused for such reasons as the Service Director of Planning and Environment considers appropriate.

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## Buckinghamshire Council

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### Report to Strategic Sites Planning Committee

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<b>Application Number:</b>	PL/22/2657/FA
<b>Proposal:</b>	<p>A hybrid application to comprise:</p> <p>Part A - A full application for the change in use of 25.6 ha of land at Alderbourne Farm to a nature reserve.</p> <p>Part B - Outline application - with all matters reserved (except for principal points of access) for land at Alderbourne Farm to comprise backlots and up to 35,000 sqft (3,252 sqm) of associated film production buildings (workshops) together with access roads and parking;</p> <p>Part C - Outline application for 32.6 ha of land at Pinewood South with all matters reserved (except for three principal points of access) to comprise up to 1,365,000sqft (126,817sqm) of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure.</p>
<b>Site location:</b>	Land South of Pinewood Studios and Alderbourne Farm, Pinewood Road, Iver Heath, Buckinghamshire, SL0 0NH
<b>Applicant:</b>	Pinewood South Limited
<b>Case Officer:</b>	Rachel Marber
<b>Wards affected:</b>	Iver, Stoke Poges and Wexham, Denham
<b>Parish-Town Council:</b>	Iver and Fulmer Parish Councils
<b>Valid date:</b>	29 July 2022
<b>Determination date:</b>	3 March 2023
<b>Recommendation:</b>	That the hybrid 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, publicity of proposals affecting the setting of listed buildings, provided no new substantive planning reasons for refusal arise following completion of the consultation period, and the completion of a satisfactory 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/ Reason for Planning Committee Consideration**

### **The Planning Application**

- 1.1 Full planning permission is sought for the change of use of land at Alderbourne Farm to a nature reserve. Outline planning permission, with all matters reserved except for access, is sought for the expansion of Pinewood Studios and built provisions associated with the nature reserve. As the application proposes both full and Outline planning applications, this is referred to as a hybrid planning application.
- 1.2 The proposed development comprises of the following:
  - Part A - Creation of a nature reserve;
  - Part B - Film Production Studios (expansion of the existing Film Studios) and Backlot land for outdoor filming; and,
  - Part C - Film Production Studios (expansion of the existing Film Studios), Education and Business Growth hubs (referred to as 'Centre Stage') and multi-storey car parks.
- 1.3 The proposal would be an extension to the cluster of film-related uses based at Pinewood Studios.
- 1.4 The application sites comprise of Pinewood South and Alderbourne Farm. Pinewood South is approximately 33ha, and is sited to the west of Iver Heath, and to the south of the existing studios.
- 1.5 Alderbourne Farm comprising approximately 35.4ha of land and is sited to the south-east of Fulmer, and to the north of the existing studios.



## **Consideration by Strategy Planning Committee**

- 1.6 The application has been called in by all three ward Members for reason of its proposed scale and size in a Green Belt location and as such is required to be reported to Planning Committee.

### **Planning Issues**

#### Green Belt harm

- 1.7 The proposed development would constitute inappropriate development in the Green Belt and would result in substantial spatial and visual harm to its openness. In addition, the proposals would lead to a conflict with two out of the five Purposes of including land in the Green Belt. This harm is attributed very substantial weight. Paragraph 147 of the National Planning policy Framework (NPPF) (herein 'the Framework') states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'Very Special Circumstances' (VSC). The Framework states at paragraph 148 that VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any 'other harm' resulting from the proposal, is clearly outweighed by other considerations.

#### Other harm

- 1.8 Other harm comprises non-Green Belt related aspects of the development. In terms of the other harm: the harm to the landscape that is afforded significant weight; the harm to neighbouring residential amenity and permanent loss of valuable mineral resource under the site is afforded moderate weight; increased air pollution and poor design is attributed limited weight; and loss of BMV agricultural land is given very limited weight. Overall, the harms weigh very substantially against the application. There are a number of factors which are neutral.

#### Heritage Harm

- 1.9 Special regard has been given to the desirability of preserving Listed Buildings and their settings and special attention to the desirability of preserving the character or appearance of Conservation Areas as required by sections 72 and 66 of the Planning (Listed Building and Conservation Areas) Act 1990. The report recognises that the proposed development would have a negative effect on the significance of the heritage assets which would amount to be less than substantial harm and at the lowest end of the scale in terms of the Framework, to which great weight is attached. This has been weighed against the public benefits of the scheme and it is concluded that these benefits would outweigh the harm arising. Having regard to this, it is considered there is no clear reason for refusal on this ground.

#### Benefits

- 1.10 The benefits which would flow from the development centre on the proposal's national significance in terms of developing the strengths of Pinewood Studios for UK film production and delivering significant economic benefits. 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 would aid local, regional and national recovery. The education and business hub would help to address the skill shortage in the sector. These benefits are very significant and clearly align with local and national economic growth and local strategies. These are attributed very significant weight. Other associated benefits delivered in the form of community uses, well-being uplift and contribution to arts and culture would carry moderate weight. The proposed development is considered to be strongly related to the specific Pinewood site/location, this is attributed significant positive weight. Environmental benefits to Biodiversity Net Gain is afforded significant weight and the nature reserve is attributed moderate weight.
- 1.11 In considering the planning balance Officers have concluded that the harms are clearly outweighed by the benefits. 'Very Special Circumstances' do exist in this case. The benefits of the scheme would also outweigh the identified heritage harm.

#### Other matters

- 1.12 The proposal complies with the policy and other objectives of the Framework relating to 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, contamination and waste. These matters do not represent benefits to the wider area but demonstrate an absence of harm to which neutral weight is attributed.

#### Planning balance

- 1.13 In considering the very special circumstances balance, officers have concluded that the Green Belt harm and other harm are clearly outweighed by the benefits. 'Very Special Circumstances' do exist in this case. Whilst the proposals would conflict with the development plan, there are significant material considerations that weigh in favour of the proposals. It is recommended that planning permission is granted subject to conditions and completion of a satisfactory s106 Agreement.

#### *Recommendation*

- 1.14 That the hybrid 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, publicity of proposals affecting the setting of listed buildings, provided no

new substantive planning reasons for refusal arise following completion of the consultation period, and the completion of a satisfactory 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 the Site and Proposed Development**

- 2.1 The application site comprises two land parcels, Pinewood South and Alderbourne Farm.

### *Pinewood South*

- 2.2 Pinewood South is located to the west of Iver Heath and comprises 32.6ha of land located to the south of the existing studios, west of Pinewood Road and east of Black Park Country Park. It extends southwards to the Uxbridge Road (A412). The land comprises a number of open fields, which have been the subject of quarrying and subsequent land fill.
- 2.3 The boundaries of the site are marked principally by hedgerows and trees. This has been supplemented by bunds in some locations associated with the storage of topsoil during the working of the former 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.
- 2.4 The site is predominantly flat, save for some large temporary earth bunds 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.
- 2.5 The site lies immediately to the south of the existing Pinewood Studios, with part of the application site overlapping into the studio estate. This overlapping area includes a number of existing workshop structures, which would 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.
- 2.6 There are 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 two, 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.

- 2.7 The roads bounding the site are the A412, a dual carriageway and Pinewood Road, a carriageway connecting Five Points Roundabout (FPR) with villages to the north including Fulmer and Gerrards Cross. Pinewood Road provides access to Pinewood Studios.
- 2.8 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 backlot land.
- 2.9 To the west, Black Park Country Park is a 500 acre site including woodland, heathland and open space. The park area that immediately adjoins the application site comprises woodland with formal paths.

#### *Aldbourn Farm*

- 2.10 Alderbourn Farm is located to the north of Iver Heath and comprises 35.4ha of land located to the north of the existing studios, north of Severn Hills Road. It extends northwards to Hawkswood Lane and the M40 motorway. The land comprises a number of open fields, which were last lawfully used for agricultural use.
- 2.11 The boundaries of the site are marked principally by hedgerows and trees. Along the boundary to Alderbourn Lane, there are agricultural field gates. The boundary to Seven Hills Road is marked by a temporary security gate and a telecoms mast at the existing site access, with some larger trees and hedgerow intermittently along its front boundary edge.
- 2.12 The site is predominantly flat, with some high land towards the south and north. The Alderbourn River dissects the northern half of the site. On the southern half of the site there are abandoned, former agricultural barn buildings and Farm House, formally associated with the agricultural use of the site.
- 2.13 The site directly adjoins a number of residential properties. Part of the southern boundary of the site abuts numbers 1-4 Springfield Cottages, on Alderbourn Lane. The eastern site boundary is shared with Field End Lodge and Farm along Seven Hills Road, and to the north of the site properties are accessed off a private road from Hawkswood Lane (Aldbourn Arches and Orchard Cottage).
- 2.14 The roads bounding the site are Seven Hills Road to the south, which is subject to realignment under planning application ref: PL/19/4430/FA and Alderbourn Lane which leads to Hawkswood Lane to the west and north of the site. The west of the site is bound by the M40 motorway and M25 motorway interchange.

- 2.15 Pinewood Studios, 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 backlot land.
- 2.16 Within the south eastern site boundary there is Brown's Wood Ancient Woodland and to the north, Hawk Wood, which is undesignated Ancient Woodland. Just beyond the south west, Black Park Country Park is a 500 acre Site of Special Scientific Interest including woodland, heathland and open space.

### **Development proposal**

- 2.17 The planning proposal comprises three parts:

Part A: A full planning application for the change in use of 25.6 ha of land at Alderbourne Farm to a nature reserve.

Part B: An outline planning application with all matters reserved except for principal point of access for land at Alderbourne Farm for use associated with Film and TV comprising of the following components:

- Access off Sevenhills Road
- Demolition of existing agricultural buildings
- Provision of up to 2.9 ha of backlot land
- Construction of up to 3,252 sq.m of film production buildings (workshops)
- Parking provision for up to 188 cars

Part C: Outline planning application with all matters reserved except for principal points of access for land at Pinewood South for use associated with Film and TV comprising of the following components:

- Three access points off Pinewood Road and A412 Uxbridge Road
- Provision of up to 2.4ha of backlot land
- Construction of up to 126,817 sq.m of film production buildings (sound stages, workshops, offices and ancillary uses)
- Construction of up to 4,645 sq.m of education and business hubs
- Parking provision for up to 2,480 cars through provision of three multi storey car parks

- 2.18 The application included an Environmental Statement (ES) as required under the Town and Country Planning (Environmental Impact Assessment)

Regulations 2017 (as amended). The ES provides an overview of the likely environmental impact of the proposals and assesses “likely significant effects” with a summary of mitigation measures proposed and contains a methodology for assessing the significance of the environmental effects and the cumulative impact. 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

2.19 An Addendum to the ES was submitted in December 2022. The Addendum is considered alongside the originally submitted ES within this report.

#### *Consideration of Alternatives*

2.20 The EIA Regulations state that an ES should include ‘a description of the ‘reasonable alternatives’ (for example in terms of development design, technology, location, size and scale) considered by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’.

2.21 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’. The main design alternative considered was for varying extents of car parking, location of the business and education hubs, location and depth of green infrastructure and the scale and extent of Alderbourne Nature Reserve and the built form zone.

- 2.22 The EIA assesses the likely significant effects, based on a change 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.'
- 2.23 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 applicants state that there are no alternative sites on which the development could be sited given the need for juxtaposition with Pinewood Studios. The 'fixed' location of the development is due to its dependency for success based on the existing Pinewood Studios, by virtue of benefits delivered through economies of scale and creation of a creative cluster. The 'fix' presence of the scheme was agreed through the grant of planning permission for a film studios extension as part of the Screen Hub UK planning permission. As such, it is established that the development needs to be co-located adjacent to Pinewood Studios, and therefore its location is a fixed on which cannot be subject to disaggregation.
- 2.24 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.
- 2.25 Matters scoped out included: Agricultural Land; Archaeology; Built Heritage; Water Resources; Flood Risk and Drainage; Lighting; Minerals and Waste; Risk of Major Accidents and/or Disasters; Ground Conditions and Consideration of Alternatives.
- 2.26 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 appendix E to this report.

#### *Cumulative effects Assessment*

- 2.27 Four projects have been considered for the assessment of in-combination effects with the Proposed Scheme, including the improvements to Seven Hills Road and Five Points Roundabout, Phase 3 of the Pinewood Studios Development Framework (PSDF) and the Colne Valley Motorway Service Area. The in-combination effects would only be greater for creation of employment, visual harm to Springfield Cottages and immediate surrounding landscape (Seven Hills Road, Alderbourne Lane and Hawkswood Lane) with the construction and operation of the Seven Hills Road improvement.

*Community Engagement and Public Consultation:*

2.28 The applicant has submitted a Community Engagement Statement summarising details of a programme of stakeholder engagement undertaken in April 2022, prior to the submission of the planning application.

2.29 It is reported that approximately 165 people were engaged in the consultation, which included:

- A series of in- person virtual briefings with key local stakeholders, residents, studio staff and tenants.
- Distribution of letters containing an overview of the proposals.
- A project website, including details of the scheme and feedback facilities.
- A press release to local, national and international news outlets.
- Sharing of project details on social media.

### **3.0 Relevant Planning History**

*Pinewood South*

3.1 Pinewood South was subject to a previous planning proposal (referenced PL/20/3280/OA), granted conditional approval in April 2022 for use of the land for a visitor attraction, film production studios and an education and business growth hub. This permission comprises a fall-back position to the proposed development, this is discussed further within the other considerations section of the report.

3.2 This Outline Planning Application with all matters reserved (except for principal points of access) proposed 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);
- Education and business hub (50,000 sq ft);
- Associated parking and servicing; and,
- Green Infrastructure

3.3 The main difference between this approved scheme and the current proposal is that development associated with the proposed application would almost double the provision for built form for film production and would extend across a greater area within the site. Multi-storey car parking is proposed



instead of the consented surface level car parking which increases the area of built form. Furthermore, the visitor attraction element of the scheme has been omitted. The main differences between the Pinewood South schemes are summarised in Table below:

**Differences between consented and current proposals at Pinewood South**

	<b>Existing Consent</b>	<b>Current Proposals</b>	<b>Differences</b>
<b>Proposed Use</b>	350,000 sq ft visitor attraction  350,000 sq ft film production buildings  50,000 sq ft education and business hub	1,365,000 sq ft film production buildings  50,000 sq ft education and business hub  Up to 2.4ha of backlot land	Visitor attraction removed, film and tv production space increased. Backlot provision introduced.
<b>Gross External Areas</b>	69,677m <sup>2</sup>	131,458m <sup>2</sup>	Proposal would almost double the provision for built form
<b>Maximum building heights</b>	21.5m	21.5m	The highest maximum height remains the same. The current proposals would have a lower maximum height south of Park Lodge than consented Option B, but a taller maximum height north of Park Lodge.
<b>Parking</b>	2,341 cars & 25 coaches  (surface parking)	2,480 cars in multi storey car parks	Similar levels of car parking although delivery is currently proposed to be via three multi storey rather than surface level parking

<b>Green Infrastructure</b>	10.7 hectares	10.7 hectares	No difference
<b>Peace Path</b>	Relocated	Retained and improved	The Peace Path is to stay in existing location be improved via resurfacing.

*Park Lodge Quarry, Pinewood Road – Most recent permissions*

3.4 The majority of Pinewood South was previously subject to quarrying with the quarry presently subject to a restoration programme to be restored to agricultural land.

<b>Reference</b>	<b>Proposal Description</b>	<b>Decision</b>
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
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
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
CM/35/17	Variation of Condition 1 of planning permission CM/39/16 to provide for the continuation of mineral extraction and	August 2017

	processing and site restoration until 31 October 2017, with the exception of Phase 11 which is to be restored by 31 December	
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*Alderbourne Farm*

3.5 There is no relevant planning history, with several historic applications relating to extensions to the Farm House.

*Pinewood Studios*

13/00175/OUT	<p>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).</p> <p>Referred to as Pinewood Studios Development Framework (PSDF).</p>	Refused, and Appeal Allowed by the Secretary of State, June 2014
13/00176/FUL	Highway improvements to the Five Points roundabout. Conditional Permission July 2013	Consent expired, unimplemented
14/01992/REM	Application for approval of first reserved matters comprising details required by conditions 2, 11, 12 and 14 of outline	Conditional Permission December 2014

	planning permission 13/00175/OUT, including details of sound stages, offices, workshops and associated infrastructure, landscaping and other works	
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 work	Conditional Permission April 2017

*Standalone Planning Consents (some of which are within the Pinewood Studios Development Framework red line but differ from the parameter plans)*

<b>Reference</b>	<b>Proposal Description</b>	<b>Decision</b>
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
PL/19/3858/FA	Plot 1.04 Demolition of existing building and replacement with a single sound stage	Conditional Permission March 2020
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
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
PL/22/1292/FA	Construction of detached workshop at Pinewood Studios	Conditional Permission July 2022

PL/21/4074/FA	Enlargement, improvement and signalisation of the Five Points Roundabout and its approaches	Pending determination
PL/22/4314/FA	Use of land at Pinewood Studios (PSDF development zone 4a and 4b) for car parking for a temporary period of 24 months	Pending consideration
PL/22/4178/FA	Construction of a 5 storey multi-storey car park with ground floor workshop, associated landscaping, security hut, surface level car parking, an area of unit base and internal reconfiguration of site access at Pinewood Studios East	Pending consideration
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

#### 4.0 Summary of Representations

- 4.1 The application was subject to the relevant consultation, notification and publicity requirements. An initial consultation was undertaken in August 2022 and followed by a second consultation in December 2022.
- 4.2 At time of writing, in response to the consultation 35 individual letters of objection from the local community and letters from other bodies have been received. In addition, a total of 46 comments of support have also been received.
- 4.3 All representations received from statutory consultees, non-statutory consultees and other interested individuals, groups and organisations are 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 (as amended) requires that applications are determined in accordance with the development plan unless other material considerations indicate otherwise.
- 5.2 Section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 72 requires that special attention is given to the desirability of preserving the character and appearance of Conservation Areas.

### *The Development Plan:*

- 5.3 The adopted development plan comprises the saved policies of the South Bucks District Local Plan (adopted 1999, consolidated 2007 and 2011), South Bucks Core Strategy (2011), and the 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 C15 Sites of Geological Importance

Policy EP3 Use, design and layout of development

Policy EP4 Landscaping

Policy EP5 Sunlight and daylight

Policy EP6 Designing to reduce crime

Policy EP16 Hazardous Substances

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 5 Open Space, Sport and Recreation

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 Minerals and Waste plan policies relevant to the proposals include:

Policy 1: Safeguarding Mineral Resources

Policy 25: Delivering high quality restoration and aftercare

Policy 26: Safeguarding of Minerals Development and Waste Management Infrastructure

Policy 27: Minimising Land Use Conflict

*Guidance other Material Considerations*

- 5.7 Key policy and guidance documents include:

- Iver Neighbourhood Plan (Referendum version) 2022
- 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)
- Local Transport Plan: Buckinghamshire Local Transport Plan 4, (April 2016)

- Buckinghamshire Countywide Parking Guidance, September 2015
- Burnham Beeches Hydrology Report
- Burnham Beeches SAC Strategic Access Management and Monitoring (SAMMS) SPD 2020
- Buckinghamshire Council Biodiversity Net Gain – Supplementary Planning Document (SPD), July 2022
- South Bucks and Chiltern Councils Joint Open Space Study Final Report August 2018
- Chiltern and South Bucks Economic Development Strategy: Chiltern District Council & South Bucks District Council (August 2017)
- Industrial Strategy Building a Britain fit for the future 2017
- Colne Valley Regional Park objectives

*Other key material considerations:*

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

5.8 The consultation on the National Planning Policy Framework of December 2022 does not materially change any of the planning policy considerations required for the assessment of the planning application.

*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. Work is currently being undertaken at very early stages on a new Buckinghamshire-wide local plan.

## **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 application site is located within the Metropolitan Green Belt. Proposals within the Green Belt are assessed against the Government's planning policies set out in Section 13 of the Framework in addition to the Council's own Green



Belt Policies. The Framework states that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

- 6.2 There are five purposes of including land in the Green Belt as defined with the Framework. There is a strong presumption against inappropriate development in the Green Belt, as advised by the Framework. Inappropriate development is, by definition, harmful to the Green Belt and afforded substantial weight. If the development is considered inappropriate development, VSCs will only exist where the harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations.
- 6.3 Saved Local Green Belt Policy, GB1 of South Bucks District Local Plan (1999) reflects this national Green Belt guidance. Saved Policy GB4 of South Bucks District Local Plan (1999) outlined new employment buildings as being unacceptable in the Green Belt, this policy carries limited weight due to conflict with appropriate Green Belt exceptions as outlined within the Framework (2021).

*Whether the proposals are inappropriate development*

- 6.4 Taking each application:

Part A

- 6.5 Paragraph 150 of the Framework identifies certain other forms of development that may be considered appropriate in the Green Belt provided, they preserve its openness and do not conflict with the Purposes of including land within it. Part A of the proposals, for a change of use of Alderbourne Farm to a Nature Reserve, would fall under Framework exception paragraph 150 e, “material changes in the use of land”, and therefore this element of the proposal is considered appropriate in the Green Belt provided that it preserves openness and does not conflict with Green Belt Purposes.
- 6.6 The majority of works associated with the forming of the Nature Reserve would not comprise built development, with the exception of the bat building and boundary landscaping. Boundary landscaping would be controlled by way of condition to ensure natural landscape is used, avoiding high security fencing which has propensity to harm openness. The bat barn building, would fall under the Green Belt exception 149b, the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. It is considered that the built element proposed would be sympathetic with the use of the site as a Nature Reserve; of natural material, purposed for habitat creation or enjoyment/viewing and over and above this, small scale in nature and well assimilated into the surrounding landscape, maintaining visual openness. It is therefore considered

that the Nature Reserve, and any associated built form would not result in harm to Green Belt Purposes, or openness. The proposals for Part A of the proposed development are therefore not considered inappropriate development in the Green Belt.

#### Part B

- 6.7 Paragraph 149 of the Framework states that a Local Planning Authority should regard the construction of new buildings as inappropriate in the Green Belt, other than for a number of exceptions. The exception at paragraph 149 g. includes the 'limited infilling or the partial or complete redevelopment of previously developed land'. As Alderbourne Farm last comprised agricultural use, Part B of the development proposal would not fall under this exception. The proposals are therefore inappropriate development in the Green Belt.

#### Part C

- 6.8 The studio expansion development would also not fall within any of the Green Belt exceptions, formerly comprising agricultural land. The proposals are therefore inappropriate development in the Green Belt.

#### *Impact on Openness and Green Belt purposes*

- 6.9 It is well established that there are both spatial and visual aspects that are necessary to consider when assessing the potential impact of a development on the openness of the Green Belt.
- 6.10 There are five Purposes of including land in the Green Belt as set out in paragraph 138 of the Framework:
- (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.
- 6.11 Background documents to the withdrawn Local Plan include analysis which helps inform the assessment of the impact on openness and Green Belt Purposes. 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.

6.12 These areas were selected for further consideration because they were weakest when assessed against 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 and given weight.

*Spatial aspects - Green Belt Assessment 2016 and 2018*

6.13 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.

6.14 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.

6.15 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 degrees 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.’

6.16 Turning to address the inappropriate development parts of the proposal only.

*Part C Pinewood South*

*Spatial Impact:*

6.17 This part of proposed development would be located on a total site area of 32.6ha (including land required by part C only). The total proposed film and tv buildings introduced would provide up to 131,458sq.m of gross floor space, which would occupy approximately 21.9ha of land. The area of built development therefore equates to 67% of the application site (red line) area. The maximum building height would be 21.5 metres, creating around 2,820,000m<sup>3</sup> of built form. The remaining 10.7ha which would not be built on

would be made up green spaces and landscaping. The loss of 21.9ha of open, undeveloped countryside with large scale development would result in significant impact on openness. This impact would be substantial given the scale and extend of built form and the open land take involved.

*Visual Impact:*

- 6.18 Pinewood South comprises visually open and undeveloped land. When travelling along Pinewood Road, Pinewood South is experienced as a tract of open countryside between the existing Pinewood Studio developments to the north and residential development to the south. From the eastern edge of Black Park Country Park (BPCP), there are long views out across fields within the site. These fields provide a coherent rural setting to the Park and bridleway WEX/21/1, and a buffer of open space between the Park and Pinewood Road.
- 6.19 The application is accompanied by a Landscape and Visual Impact Assessment (LIVA) which is a tool used to identify and assess the nature and significance of the effects of a proposed development upon the landscape and upon views and visual amenity. Whilst landscape impacts will be further assessed within this report, the LVIA identifies a number of key visual receptors or view-points. It is from these view-points where impacts in loss of openness within the Green Belt may be experienced.
- 6.20 Key visual receptors where the sensitivity to visual change as a result of the proposed development would be greatest are as follows for Pinewood South:
- Pinewood Road
  - Black Park bridleway WEX/21/1
  - Residents within Park Lodge & Royal Lodge
  - Users of the Peace Path
- 6.21 Other locations the development would be visible from are as follows:
- Properties on Parkway at the edge of Iver Heath
  - Along Uxbridge Road near the Crooked Billet
- 6.22 Therefore the site would be visible from northern, eastern and western viewpoints. Structures and activity associated with the urban influence of Pinewood Studios would be introduced directly in sight of when viewed from these viewpoints. For users of the Peace Path and Black Park bridleway this would reduce the rural setting presently enjoyed by those using these countryside recreational routes. It is recognised that mitigation would be proposed in terms of planting which would take a number of years to establish. It is noted that users of these recreational routes already have views of the existing studio development at Pinewood West however, the application site

provides some visual relief to that development. The scale of development would completely remove the visual connection to the open countryside currently enjoyed from all visual receptors to or across the application site. The loss of openness when viewed from within BPCP, the Peace Path and by adjacent residents is similar to the loss which would result from the previously consented development (SHUK). However, the current proposals would have a greater impact when viewed by people using Pinewood Road due to the increased extent of built form and less landscaping when viewed from this vantage point.

#### *Part B Alderbourne Farm*

##### *Spatial Impact:*

6.23 The proposed development would be located on a site area of total site area of 9.8ha, of which built development would comprise 6.4ha. The total proposed film and tv buildings introduced would provide up to 3,252sq.m of floor space, with 2.9ha of back lot land also proposed. The film and tv buildings would be located on an area of previous built footprint for agricultural buildings comprising 3,540sq.m, due to be demolished. Once the existing agricultural buildings are demolished there would therefore be no net increase of permanent built development on the site, in terms of building footprint. There would however, be an increase in volume and scale introduced onto the site, with proposed buildings resulting in approximately 19,512m<sup>3</sup> of built form, above the mostly single storey structured abandoned barns currently in situ on site.

##### *Visual Impact*

6.24 Alderbourne Farm is rural in character despite proximity to urban influences such as Pinewood West and East, the motorways of the M40 and M25 which are both visual and audible influences from some parts of the site. Although the majority of the site is undeveloped, a cluster of abandoned farm buildings are located on the north facing valley side near Seven Hills Road. These include a former dwelling, barns, and areas of hardstanding.

6.25 The application is accompanied by a Landscape and Visual Impact Assessment (LIVA) which is a tool used to identify and assess the nature and significance of the effects of a proposed development upon the landscape and upon views and visual amenity. Whilst landscape impacts will be further assessed within this report, the LVIA identifies a number of key visual receptors or view-points. It is from these view-points where impacts in loss of openness within the Green Belt may be experienced.

6.26 Key visual receptors where the sensitivity to visual change as a result of the proposed development would be greatest for Alderbourne Farm and therefore where the loss of openness would be perceived are as follows:

- Seven Hills Road

- Alderbourne Lane
- Hawkwood Lane
- Black Park bridleway WEX/21/1
- Residents within Springfield Cottages

6.27 The site is therefore highly visible from western, southern and northern aspects. Although some built form is already present on the site, this comprises small scale agricultural barns which are not uncommon in the countryside. Although, the proposed workshops would have a lower overall footprint than existing buildings on site, they would have a greater overall volume. The workshops would also have a more formalised layout compared with the clustered form of the existing buildings and would be more substantial in appearance.

6.28 Furthermore, the backlot land would result in the presence of structures, which although temporary, would be on site the majority of time, and of unrestricted height. This unrestricted height has potential to increase views of the site beyond the immediate area. Development would be restricted to the southern part of the site, with the northern half left open for use as a nature reserve (part A of the proposed development). It is also recognised that mitigation would be proposed in terms of planting however, this would take a number of years to establish. Overall, a more substantial quantum and permanence of activity would be introduced on site as a result of development proposals. This would be perceived from the immediate area, removing the rural, open aspect character of the site and replacing this with development of urban character and activity.

*Total Impact of the proposed development*

6.29 The proposed development would be located on a total site area of 42.4ha (including land required by parts B and C only). The total proposed film and tv buildings introduced would provide up to 131,170sq.m of gross floor space, which would occupy approximately 28.4ha of land. The area of built development therefore equates to 67% of the application site (red line) area. The maximum building height would be 21.5 metres. The remaining 14ha which would not be built on, would be made up green spaces and landscaping. The loss of 28.4ha of open, undeveloped countryside with large scale development would result in significant impact on openness. This impact would be substantial given the scale and extent of built form and the land take involved.

6.30 Moreover, by virtue of the use proposed development, an anticipated 4,888 car and 184 HGV additional trips per day would be generated by both staff, deliveries and visitors utilising the facilities. This activity would be concentrated to peak times, but ultimately unrestricted to take place 24 hours, 365 days a

year. This intense use of the site would also result in associated paraphernalia by way of vehicle presence, security fencing, flood lighting and backlot land use. The proposed development would therefore also result in significant harm to the spatial openness of the Green Belt by way of site intensification. This increased physical permanence and presence of development on the site, would also be visually apparent beyond the site boundary.

- 6.31 Both Alderbourne Farm and Pinewood South comprise visually open and for the most part, undeveloped land. They are located 1km apart, separated by existing development at Pinewood Studios West. Taking the visual harm caused by development on both sites together, substantial visual harm is considered to result from the replacement of open aspect countryside with large scale and permanent built form across both site. The proposed development would increase the visual size of the existing Pinewood Studios site by half, 45%. The development would therefore result in a clear loss of open countryside to both the north and south of the existing Pinewood Studios development. The openness of the countryside would be further diminished by way of boundary vegetation and security fencing, proposed at all site boundaries.

Green Belt Purposes:

- 6.32 Of the Green Belt Purposes (a – c) are considered relevant to the proposals. Each Green Belt purpose is discussed in turn below.
- 6.33 Green Belt purpose (d), which is “to preserve the setting and special character of historic towns” is not relevant as the application site is not located near to any historic towns. Green Belt purpose (e), which is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”, is also not relevant in this instance. There are specific locational requirements that mean that the expansion to Pinewood Studios needs to be sited adjacent to the existing facility, in the Green Belt and could not be located in an urban area; i.e. it is accepted that the development proposal is not footloose.

- (a) To check the unrestricted sprawl of large built up areas

- 6.34 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays a strong role in meeting the Purpose, noting ‘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 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; and the Pinewood studios site and the M25 and M40 to the north. It is therefore in conflict with the fundamental aim of the Green Belt but as the application site does not abut ‘large built up areas’, there is no conflict with this purpose.

(b) To prevent neighbouring towns merging into one another

6.35 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays a strong role in meeting the Purpose, noting '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.'

6.36 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 would 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 also be eroded by development on Alderbourne Farm.

6.37 Development sprawl would be somewhat contained by way of Black Park, existing Pinewood Studio site, road boundaries (including the M40/M25 and Uxbridge Road) and the natural boundary of Alderbourne River, restricting the extent of erosion of the gap between settlements. Even so, the gaps between settlements would be visually reduced by the proposed development and therefore there would be significant conflict with this Purpose.

c) To assist in safeguarding the countryside from encroachment

6.38 The Stage 2 Green Belt Assessment 2018 finds that Strategic Zone A plays a moderate role in meeting the Purpose. The proposed development would result in significant physical encroachment into the open countryside through the loss of 41.9ha of open former, agricultural land with substantial development. The harm to this Purpose is therefore apparent. Given the open character of the development sites and the contrasting setting this provides to the adjacent urban development, the harm is considered very significant.

6.39 In summary, the proposed development would constitute inappropriate development and would result in very substantial spatial and visual harm to the openness of the Green Belt. In addition, the proposals would lead to a conflict with the fundamental aim of the Green Belt and two out of the five Purposes of including land in the Green Belt. The proposal would be contrary to policy GB1 of the Local Plan. Very substantial weight is attributed to this identified Green Belt harm. The Framework states at paragraph 148 that VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any 'other harm' resulting from the proposal, is clearly outweighed by other considerations. The assessment of 'other harm' is considered within this report, with the VSCs addressed in the last section of the report entitled 'Planning Balance'.

## **7.0 Economic**



Core Strategy Policies:

CP10 (Employment)

Local Plan Saved Policies:

E2 (Pinewood Studios)

- 7.1 The Framework includes economic policy 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.”*
- 7.2 Paragraph 82 of the Framework 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.
- 7.3 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 this sector requiring substantial increases in studio capacity and skills.
- 7.4 South Bucks’s Core Policy 10 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.

*Local Strategies*

- 7.5 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 in Buckinghamshire. 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’.*
- 7.6 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.

- 7.7 The Buckinghamshire Strategic Vision, produced by the Buckinghamshire Growth Board, sets out the ambition for a thriving, resilient and successful county. Specific reference is made to the role of Buckinghamshire's growth sectors in underpinning this and the aim to capitalise on existing specialisms and economic hubs, of which the creative sector and Pinewood is one. The Vision further highlights the importance of skills, local employment opportunities and flexible commercial space to support the growth of Small and Medium Enterprises.

#### *National Studies*

- 7.8 A recent British Film Industry (BFI) report dating December 2021 highlights that 2021 saw record levels of production in the sector, equating to almost £5 billion production spend solely on film and high-end television resulting in a return on investment to the UK economy including tax reliefs of £13.48 billion GVA, supporting 219,000 jobs.
- 7.9 The Leading Recovery and Growth Strategy highlights the BFI skill review of June 2022 which highlighted film and tv production growth will require between 15,130 and 20,700 additional full time employees by 2025 to meet growth demand on the sector. Action advised is additional spend on skills and training, education and professional development. The proposed Education and Business Hub would help towards providing much needed jobs.

#### *Economic Benefit*

- 7.10 The planning proposal is accompanied by a Leading Recovery and Growth Strategy, a statement setting out the commercial justification for Pinewood Studios Screen Hub, an Economic and Social benefits assessment and Chapter 6 of the ES addresses the socio-economic impacts of the proposed development.
- 7.11 These documents demonstrate the significant positive economic effect the proposed development in its entirety would have on the Buckinghamshire and UK economy. During construction 1,390 direct full time jobs would be created, with a further 1,450 jobs via indirect and induced effects. Once the proposed development is in operation it is forecast to create 3,730 direct full time jobs, with a further 3,700 indirect and induced full time jobs and a further 760 spill over jobs. The jobs created would be for skilled labour, with above average annual salaries. It is considered that the proposed development would deliver an additional £641 million GVA to the UK economy, per year, once operational. These economic benefits are set in a backdrop of Covid-19 recovery and a period of economic recession.
- 7.12 The proposed development would also deliver opportunities to increase skill levels through delivery of the Education Hub, which would be able to provide training and learning initiatives for up to 500 people at any given time, including providing tertiary, vocational education focused on film and screen

media, alongside an adult education role. The Business Hub through collaboration with delivery partners, including Buckinghamshire Business First and Creative UK, would facilitate skills and professional development and business growth, through the provision of mentoring schemes and employment and training opportunities, such as those associated with the National Film and Television School, alongside expanding opportunities for start-up businesses in the creative industries.

- 7.13 These employment and training opportunities, would in turn deliver social and health and wellbeing improvements and benefits.
- 7.14 In the appeal decision APP/N0410/A/13/2199037 (PSDF) the Inspector considered the harm to the creative industries sector which would arise from a rejection of that appeal proposal. It was considered 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.
- 7.15 An employment strategy would be subject to condition and S.106 agreement to ensure local residents benefit from the employment and training opportunities.

#### *Need*

- 7.16 The commercial justification statement for the proposed development dating October 2022 highlights that in addition to the skill shortage, there is shortage of large purpose built film and high end television production studios in the UK to accommodate inward investment. In a BFI report, Screen Business' December 2021 it was highlighted that, *"the importance of expanding the UK's film and television studio offer in order to service increasing levels of production was recognised by HM Government which, in 2020, provided the BFI with £4.8 million over three years to expand its work promoting the UK as a destination of choice for film and television studio investment."*
- 7.17 In a letter written to Pinewood dating July 2022 by the BFI, they emphasise the film and tv shortage by stating, *"there is a proven lack of studio stage space in the UK with compelling evidence of significant future demand from inward investors in the global feature film and high-end TV drama market to come here to make their content. In short, there are more films and dramas that wish to film in the UK than the existing studio space available can accommodate. In order to enable the UK to capitalise on this opportunity and remain globally competitive, more studio space or expanded existing facilities are needed. The shortfall of studio space to meet strong and continuing demand has been evident for at least the last five years and more likely over the last decade. Some new schemes have come forward such as your own at Pinewood and Shepperton but there remains a critical shortfall."*
- 7.18 The British Film Commission (BFC) in their Stage Space Support and Development Strategy dated October 2022 also emphasised the crucial need for developing more stage space. In a letter directly relating to the development proposals the BFC state, *"The global demand for audio visual content for theatrical release, broadcast and streaming has never been greater."*

*As a result, demand for purpose-built, high quality studio accommodation, in optimum geographical locations, with access to experienced crew, and comprising sound stages (of various sizes), workshops, offices and backlot, is outstripping supply. This has resulted in the loss of multiple major productions, and the associated investment and employment, to international competitor jurisdictions. Pinewood Studios is a globally recognised and respected brand. Along with Shepperton Studios, it provides the kind of purpose-built, high-end accommodation required by the major inward investment film and TV productions which accounted for over £4.7 billion of the total £5.6 billion spent on film and HETV production in the UK in 2021”.*

- 7.19 The applicants refer to research carried out by Knight Frank in their ‘Taking Centre Stage’ 2022 report, which found that existing studio stock is insufficient to keep pace with the rising demand and estimated a national demand for 6m sqft studio/stages. There is some concern that this estimated figure is higher than other estimates by Lambert Smith Hampton, Saffery Champness and CBRE who estimate that over the short to medium term the unsatisfied demand for sound stage space to be between 2 and 2.5m sq ft.
- 7.20 However, it is important to note that it is inherently difficult to accurately forecast future studio demand, largely due to the dynamic nature of occupier activity and the immediacy of requirements. This is further complicated on the basis that overall demand is global and is influenced by socio-economic and political factors, as well as wider creative industry factors.
- 7.21 There are a number of developments in the pipeline including those currently under construction, those with planning permission (including that already permitted on Pinewood South), and applications pending. It is also noted that there are other early prospective schemes being worked up which are too early in the process to consider. Whilst there is potential in the pipeline which might meet an un-satisfied demand of between 2 and 2.5m sq ft, some of those developments with planning permission may not obtain the funding and/or industry support to develop or complete them; it is unclear how many of those which do not yet benefit from permission might obtain permission and, if they did, would actually be built out.
- 7.22 The applicants argue that the key issue is location with the benefits of being a leading site within the West London Cluster and the primacy of Pinewood studios setting them apart from many other film and tv studios. The fact that this is a development proposal by the Pinewood Group Limited provides more certainty that the film and tv space will be delivered as the proposal comprises the extension of a well-established facility which has a very strong reputation in the industry and is best placed, qualitatively to meet the need. Pinewood Studios is an established business which already has a strong customer base that benefits the Buckinghamshire economy and has delivered significant growth in its existing facilities. To this end, it is a known fact that the existing Pinewood Studio site is at maximum capacity due to being occupied by Disney. This position was accepted in the determination of the previous Pinewood South, SHUK proposal, which permitted 350,000 sq ft of additional studio space. The applicants have confirmed that Pinewood studios has customer

demand for major new floorspace and that occupier arrangements are in hand for this development. This demonstrates that, in terms of quantitative need, forecast demand is less important in this industry than a proven ability to attract productions, particularly major “block buster” film to the UK through stimulating demand. Pinewood is uniquely placed to stimulate such demand.

- 7.23 Further, advantages of extending the existing studio space at Pinewood include the critical mass of linked facilities for major film and high end television (HETV), with integrated floorspace of sound stages, workshops and offices with access to on-site specialist services, which Pinewood would provide. The applicants argue that other new, greenfield sites do not have this advantage and will always be secondary in any planning assessment. They also state that none of the other proposed film studios can deliver the scale of advantage in content and timely development that the Pinewood Studios can provide. Officers consider that this is a significant matter which weighs heavily in favour of this development. It is acknowledged that additional advantages would be delivered from extending an existing facility, such as economic benefits from a larger creative cluster.
- 7.24 In terms of the consideration of alternative sites the applicants have stated that there are no alternative sites on which the development could be sited given the need for juxtaposition with Pinewood Studios and that the strength of the geographical fix is unique to Pinewood. It is accepted that this is distinct from other studio applications which are largely new, greenfield, speculative and with no assurance of delivery and do not benefit from the critical mass of related services, facilities and skills which Pinewood can offer.. The ‘fixed’ location of the development is due to success (in terms of delivery and economic and other benefits) being dependent on the existing Pinewood Studios, by virtue of benefits delivered through economies of scale and creation of a creative cluster. It is accepted that the proposed development is not footloose. The ‘fix’ presence of the scheme was agreed through the grant of planning permission for a film studios extension as part of the Screen Hub UK planning permission. As such, it is established that the development needs to be co-located adjacent to Pinewood Studios, and thereby is fix in situ and cannot be subject to disaggregation.
- 7.25 It is acknowledged that the availability of skilled crews in the UK to service the levels of forecast stage demand is important and the need for training to meet this need. It is considered that Pinewood Studios also has the available skill and labour set to maximise the additional studio space created and facilitate links with surrounding education facilities (providing up to 500 training opportunities at one time) which would help plug the skilled workforce shortfall. Therefore, there are qualitative and locational factors over above the quantitative need that significantly favour expansion within the industry at Pinewood Studios, above other locations.
- 7.26 This is similar to the stance taken by the Secretary of State when determining appeal relating to the PSDF, who wrote “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 PS is the natural focus of expansion within the industry.”  
(APP/N0410/A/13/2199037)

- 7.27 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. The importance of Pinewood Studios is also 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 1.28 and 2.223 of the South Bucks Core Strategy recognise the national and international importance of Pinewood Studios as a location for film and television production.

*Economic Development Officer*

- 7.28 The Council's Economic Officer has commented on the proposals and outlined that local strategies prioritise growth of Pinewood in Buckinghamshire. This support extends to industry placements in disciplines befitting the Buckinghamshire economy and to facilitate apprenticeships and employment-led models to address growing skills needs. The proposed Centre Stage, incorporating an Education Hub, would help to support these aims. The value of the film and television sector to the national, regional and local economy, particularly in relation to levels of employment and inward investment is particularly articulated, as well as the role that the proposal could play in supporting the ongoing growth of the sector, in addressing the shortfalls in studio space and addressing skills challenges. In short, there is clear support for proposals from the Economic Officer, emphasising the extent and importance of the proposed development, and its benefits, at both the local and national level.

*Summary*

- 7.29 The proposal is considered to be of national and international significance and would result in economic growth through a world-leading business in a priority sector for the UK. The investment delivered by the planning proposals would cement Pinewood at the heart of the UK film industry and build on the wider reputation of the UK, meeting an identified need of production growth in this sector. This carries very significant weight in favour of the application.
- 7.30 The proposed development would deliver direct and indirect benefits, retaining and creating thousands of jobs, attracting visitors and spend to the area, and contributing to GVA. The development would build on existing educational and business networks in the region, opening up opportunities to train, work and grow businesses in this sector. There would be of significant benefit to the national, regional and local economies. This benefit is especially

valuable at this time of economic uncertainty, the long term, permanent economic benefits carry very significant weight in favour of the application.

- 7.31 Whilst there is inevitably uncertainty in the forecasts of need for studio space, it is considered that Pinewood has a proven and unique ability to stimulate demand by attracting productions to the UK, particularly major “blockbuster” films, which the proposed development would facilitate. Further, the economic benefits of co-location of the proposed development at Pinewood Studios, taken together, are considered to carry very significant positive weight in favour of the proposals. Positive impacts on social wellbeing derive from the economic benefit. The proposal is consistent with the industrial and recovery strategies and economic priorities of Government and Buckinghamshire LEP, and is consistent with the Framework. This weighting will be factored into the planning balance.

## **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)

Iver Neighbourhood Plan Policy:

IV2 Design in Iver Heath

- 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 Policy IV2 of the Iver Neighbourhood Plan (2022) covers Pinewood South. This policy states that developments must have full regard to the relevant

Townscape Character Study guidelines and, where relevant, to preserving design features that are considered essential to the significance of the village character. Such features includes the entrance structure to Pinewood Studios and boundary landscaping along Pinewood Road.

- 8.4 The Framework at paragraph 126 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. 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.
- 8.5 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'.
- 8.6 The Framework consultation version (2022) suggests changes to strengthen the design sections, emphasising the creation of beautiful buildings and place, although at present this carries no material weight. However, recent Written Ministerial Statements from Michael Grove, dating December 2022, which carry significant weight, also emphasise the government's increasing commitment to ensuring that the planning system creates more beautiful and sustainable buildings; beautiful, popular and enduring design will be championed.
- 8.7 The applications for proposed developments B and C have been submitted in outline form with all matters reserved except for principal points of access. The detailed design of the schemes 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, while providing flexibility at the detailed design / reserved matters stage. These include:
  - Defining the key zones of development – backlot land and production space
  - Setting out the green infrastructure framework
  - Creating building zones to identify where built form would be located
  - Identifying areas for movement and parking
  - Indicating the location of vehicular access



- Providing an indication of floor levels and building heights
- 8.8 The Parameter Plans provide the basis for control over the design quality that comes forward at Reserved Matters stage. The Design and Access Statement submitted with the application sets out the design rationale for the proposed development including the development parameters. The scheme is substantial in scale and would reflect the scale and design of development that exists at Pinewood West and East. An illustrative masterplan is provided both for Alderbourne Farm and Pinewood South which illustrates how the Parameter Plans could be interpreted at detailed design stage.
- 8.9 The Design and Access Statement sets out 8 development principles which the scheme would be designed in accordance with. These are as follows:
1. A bespoke development
  2. Delivering a substantial beneficial economic impact
  3. Comprehensive studio facilities to meet the needs of a demanding industry
  4. Integration with and strengthening of the existing Pinewood Studios
  5. An enhanced green/blue infrastructure with biodiversity net gain
  6. Well connected with sustainable movement/transport
  7. A sustainable development- energy, carbon and waste
  8. A visually contained development – through massing of buildings and boundary treatments
- 8.10 The proposed development is of utilitarian design reflecting the function of the buildings and would result in substantial urban structures and built form introduced onto a greenfield site; this is addressed further in the landscape section of this report. The Parameter Plans would ensure green buffers at all site boundaries to help screen and soften the proposals, and maintain some ecological corridors for wildlife. Green buffers would be provided at site boundaries at a minimum of 10 metre widths, which would be increased to 15 metres where residential properties are immediately adjacent.

#### *Pinewood South*

- 8.11 In terms of development layout, within Pinewood South large buildings, at 21.5 metres height, would be located to the rear of the site, towards Black Park. The scale of built form would then drop to 14.5 metres at the front of the site towards Pinewood Road. Development to the south of the site, adjacent to properties at this boundary (Pleasant Cottage to Gooseberry Hill) would be restricted to a height of 4 to 8 metres. Entrance features may be provided at site access points, up to a storey in height.
- 8.12 In terms of quantum of proposed built form, Pinewood South would provide up to 126,813 sqm of studio space. This would comprise a mixture of sound stages, workshops and offices. Typically, the scale of these individual buildings are as follows:

- Sound stages (a large internal space to film scenes on sets): 1,500- 4000 sq.m at 9.2 to 21.5 metres high
  - Workshops (working facilities for construction of props, sets, costumes etc): 700 – 2,000 sq.m at 9.2 to 21.5 metres high
  - Offices (flexible working accommodation for the directorial and production teams): 1,000 – 2000 sq.m at 9 to 21.5 metres high
- 8.13 The education and business hub within Pinewood South would not exceed more than 4,645 sq.m in built form and would have a maximum height of 16.2 metres (3 storeys high).
- 8.14 No change is proposed to the Peace Path as part of this proposal. A 30 metre deep landscape buffer is proposed to site boundary with the Peace Path in order to provide further separation between built form and this recreational route and to enhance habitat.

#### *Alderbourne Farm*

- 8.15 At Alderbourne Farm Part B, the development envelope would be located within the area of the existing farm building, to ensure built footprint within the site is not extended. Buildings would extend up to 6 metres in height and provide up to 3,252 sq.m of floor space. Unrestricted backlot land would surround this development envelope, extending up to 2.9ha in size.
- 8.16 For the nature reserve, comprising Part A of the permission, an indicative landscape strategy has been provided, although detailed works would be required to be submitted by condition. The landscape strategy for Alderbourne Farm would be based on four strands:
1. An enhanced woodland framework - the strengthening and management of existing woodland and the potential creation of new woodland and scrub planting to create meaningful woodland corridors.
  2. The creation of ecological corridors - the strengthening and enhancement of existing corridors and their extension through the design of new woodland, planting and meadows supported by ecological features such as log piles.
  3. An integrated SuDS provision and wetland expansion - the provision of any required attenuation and infiltration facilities, designed to provide associated landscape and ecological benefit.
  4. Significant amenity benefits via new public access (public car park and permissive paths).
- 8.17 A final and detailed landscape design strategy for the nature reserve at Alderbourne Farm would be required by way of S.106 agreement.
- 8.18 Overall, the Parameter Plans establish the framework for future development design where sensitivities in relation to landscape buffers and the amenity of adjoining users can be addressed. Approval would be subject to appropriate conditions to agree the design and specific details of materials, boundary treatments, landscaping, and lighting. Despite this outlined mitigation and

further submission of design detail, by virtue of the nature and function of the proposed development it would not allow for high quality place making. The, resultant scale and utilitarian appearance of buildings would prevent that. However, there is scope through reserved matters to ensure that the design is the best that can be achieved compatible with the function of the buildings and the proposed development would be consistent with the surrounding Pinewood development. Further, mitigation is provided in the form of screen landscaping. Limited weight is therefore attributed to the harm caused by poor design of the proposed development; contrary to Policy CP8 of the Core Strategy, Local Plan Saved Policies EP3 and EP4 and Policy IV2 of the Iver Neighbourhood Plan.

## **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

Iver Neighbourhood Plan Policy:

Policy IV13: Colne Valley Regional Park

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 Policy IV13 of the Iver Neighbourhood Plan (2022) outlines that development proposals should make a positive contribution towards improvement of the Colne Valley Regional Park in line with its objectives and the Colne & Crane Valleys Green Infrastructure Strategy and the detailed strategy for the Mid Colne Sub-Area. In achieving this a list of criteria is set out including, to maintain and enhance the landscape, historic environment and waterscape of the park and additional requirements for proposal affecting a watercourse.
- 9.4 The Framework 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.
- 9.5 Paragraph 130 c) of the Framework emphasises the importance of ensuring new developments are sympathetic to local character, including the landscape setting. Paragraph 134 of the Framework 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.
- 9.6 The application is accompanied by a Landscape Strategy for Parts A, B and C. The Strategy 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. Within Pinewood South, this would include creating a green buffer of 30m width, along the Black Park boundary and reinforcing the northern tree belt which is used as a corridor for Bechstein bats. For Alderbourne Farm Part B development, the northern tree boundary would provide a buffer between the built development and the nature reserve. New landscaping would include woodland and scrub planting, wet grassland/ swales, species-rich grassland and native hedges. A similar habitat created on

Alderbourne Farm nature reserve would create a high quality mosaic habitat. New habitat types would also be created including wet meadows, reed bed, open water ponds and new management regimes of existing areas for ecological enhancement through green infrastructure and natural woodland regeneration.

- 9.7 A Landscape and Visual Impact Assessment (LVIA) has been undertaken as part of the ES, (Chapter 7 Landscape and Visual) which 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. Lighting has been scoped out of the ES assessment however, a condition is recommended to control light pollution impact on the landscape, and wildlife, particularly at night.

#### *Landscape Character*

- 9.8 Pinewood South falls within LCA O4: Iver Heath Mixed Used Terrace, as described in the South Bucks District Landscape Character Assessment and the Iver Heath Terrace LCA as described in the Colne Valley Landscape Character Assessment. Alderbourne Farm falls within LCA P1: Alder Bourne, as described in the South Bucks District Landscape Character Assessment and the Misbourne and Alder Bourne Tributaries LCA as described in the Colne Valley Landscape Character Assessment.
- 9.9 Pinewood South comprises of open agricultural fields formerly subject to gravel extraction. The topography of the site is flat and low lying with little level change (typically ranging from 60m to 62m AOD). There is no public access to Pinewood South save for the permissive footpath which runs from Black Park Country Park to Pinewood Road, also known as the 'Peace Path'. There are footways immediately adjacent to the site, such as along Pinewood Road and Uxbridge Road and footpaths within Black Path itself. Tree cover within the site itself is relatively sparse, although there is a mature tree belt along the permissive Peace Path and an internal hedgerow with a number of scattered mature trees in the south of the site. The site boundaries are relatively well vegetated with a hedgerow and some mature hedgerow trees along the site boundary with Pinewood Road.
- 9.10 Alderbourne Farm comprises part of valley sides and valley bottom of the Alder Bourne. The site comprises of open agricultural land with some centrally placed abandoned agricultural barn buildings and a telecommunication mast in the south-eastern corner of the site. There are trees alongside the stream in the valley bottom, and a deciduous woodland to the eastern end of the site (Brown's Wood), which is an ancient woodland. Existing studio/ workshop buildings associated with Pinewood Studios are visible on the skyline to the south of the site and the M25 and M40 motorways can be viewed from the valley peak in the centre of the site. There is no public access within the site.

9.11 The Pinewood South site contributes to the landscape setting of the Iver Heath Mixed Used Terrace (LCA 22.4) through long, straight, and consistent edges created by Pinewood Road and BPCP; the constant wooded background when viewed from Pinewood Road and the flat open grassy fields which occupy the site. The proposal would harm landscape within LCA 22.4, through:

- The loss of open, long views over fields.
- The loss of undeveloped spaces, in between highly developed areas

9.12 In respect to Alderbourne Farm Part C, the proposed development would result in impact upon the rural characteristics of the Alder Bourne River Valley (LCA 23.1). The proposals would therefore diminish the sense of ‘rural naturalness’ which is a distinctive quality of the Alder Bourne River Valley. The development would also harm landscape identified for LCA 23.1, including the:

- Visual connectivity within the agricultural valley landscape
- The sense of it being an intimate and contained valley
- The variety of field enclosures, which provide time depth to the landscape

9.13 The proposed nature reserve would have a beneficial impact on the natural heritage and recreational qualities of the site through improved management and the introduction of new permissive routes. It would be sympathetic to local landscape character and would achieve Colne Valley Regional Park (CVRP) Purposes and the Strategy and Vision for LCA 23.1. It would also achieve objectives within the CVRP Action Plan. However, the proposals for a nature reserve could not mitigate for all of the harm arising from the development on Alderbourne Farm and Pinewood South (parts B and C) as described within this section.

9.14 A summary of the landscape character effects during completion (year 1) and in the longer term (year 15), is set out in Table below. These have been determined by the applicant’s Landscape Visual Impact Assessment and subsequent review from a specialist landscape consultant appointed by the Council.

**Summary of the landscape character effects**

Landscape Character Area	Sensitivity	Magnitude of Impact	Significance of Effect
1. Completion (year 1)			

<b>2. Longer term (year 15)</b>			
Alder Bourne River Valley LCA 23.1	Medium to High	Medium	<ol style="list-style-type: none"> <li>1. Moderate to major adverse</li> <li>2. 2. Moderate to major adverse</li> </ol>
Iver Heath Mixed Used Terrace LCA 22.4	Medium to High	Medium to high	<ol style="list-style-type: none"> <li>1. Moderate to major adverse</li> <li>2. Moderate/ Major adverse</li> </ol>

### *Visual Effect*

9.15 Based on the ZTV, key visual receptors where there is sensitivity to visual change as a result of the proposed development for Pinewood South are as follows:

- Pinewood Road
- Black Park bridleway WEX/21/1
- Residents within Park Lodge & Royal Lodge
- Users of the Peace Path
- Properties on Parkway at the edge of Iver Heath
- Along Uxbridge Road near the Crooked Billet

9.16 Key visual receptors where there is sensitivity to visual change as a result of the proposed development at Alderbourne Farm are as follows:

- Seven Hills Road
- Alderbourne Lane
- Hawkwood Lane
- Black Park bridleway WEX/21/1
- Residents within Springfield Cottages

9.17 The proposed development in totality would result in a major transformation in the landscape. The landscape change would arise from the introduction of a vast quantum and scale of built form and associated infrastructure in and around the proposed building complex including access road, lighting and backlot land.

9.18 The viewpoints selected were reviewed by a specialist landscape consultant appointed by the Council. The Table below provides a summary of development impact to the viewpoints and their sensitivities.

**Summary of viewpoint effects**

Viewpoint	Sensitivity	Year 1		Year 15	
		Magnitude of Impact	Significance of Effect	Magnitude of Impact	Significance of Effect
<b>Alderbourne Farm</b>					
Seven Hills Road	Medium	Medium	Moderate Adverse	Low	Negligible and Minor to Moderate Adverse
Alderbourne Lane	Medium	Medium	Moderate Adverse	Low	Negligible and Minor to Moderate Adverse
Bridleway WEX/21/1	Medium to High	Low to Medium	Moderate Adverse	Negligible to Low	Minor Adverse
Springfield Cottages	High	High	Major Adverse	Medium to High	Moderate to Major Adverse
Orchard Cottage	Medium	Medium	Moderate	Low	Minor to Moderate Adverse
<b>Pinewood South</b>					



Pinewood Road	Low	High	Moderate to Major Adverse	Medium to High	Moderate Adverse
Bridleway WEX/21/1 BPCP	High	High	Major Adverse	Medium to High	Moderate to Major Adverse
Park Lodge and Royal Lodge	High	High	Major Adverse	Medium to High	Moderate to Major Adverse
Peace Path	Medium to High	Low	Minor to Moderate	Low	Minor to Moderate
Parkway, Iver Heath	Medium	Low	Minor to Moderate	Low	Minor to Moderate
Uxbridge Road near Crooked Billet	Medium	Low	Minor to Moderate	Low	Minor to Moderate

9.19 Compared with the consented development on Pinewood South, the proposed development would have a greater impact on views from Pinewood Road, Uxbridge Road and Park Lodge because of the increased quantum of built form, replacement of surface car parking, and building location closer to the road.

9.20 Mitigation of operational effects from the scheme would include keeping building heights low in proximity to visual receptors, retaining and reinforcing landscaping, providing green buffers around the site and next to visual receptors and designing lighting in accordance with best practice. The above assessment has factored in such mitigation measures. There would remain a number of significant adverse visual effects.

9.21 In summary, each of the developments at Alderbourne Farm and Pinewood South would result in adverse landscape that are considered to be significant. Compared with the consented development on Pinewood South, the proposed development would have a greater impact on the visual amenity of receptors in the local landscape, particularly people using Pinewood Road. Notwithstanding this impact, the fundamental landscape harm, as it relates to Pinewood South, is broadly consistent with the consented development.

9.22 The six objectives for the CVRP 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;

*With significant harm to landscape identified from the proposed development, there is conflict with this objective*

2. To safeguard the countryside of the Park from inappropriate development.

*On the basis of the proposal comprising substantial inappropriate development in the Green Belt, there is significant conflict with this objective*

3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features;

*Impact to species, habitats and geological features would be mitigated through off-setting and biodiversity betterment, as such there is no conflict with this objective.*

4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all, promoting active travel networks;

*This would be achieved through provision of a publicly accessible nature reserve of 25ha in size.*

5. To achieve a vibrant and sustainable rural economy within the Park;

*While the proposal would create significant employment on the site, it would not form part of the rural economy. The proposal would therefore not adhere to this objective.*

6. To encourage community participation including volunteering and environmental education, and promote health and social well-being through accessible, high quality green space; and

*The nature reserve element of the proposal would comply with this objective.*

9.23 It is stated that development which fails to demonstrate the above will be refused unless the context of the proposed development means that the above factors are not relevant.

9.24 The proposed development would conflict with two of the six objectives.

9.25 The Colne Valley Regional Park was consulted on the planning application and considered that the benefits put forward in favour of the development are small in comparison to the proposed scale of the scheme and amount of Green

Belt loss. The CVRP therefore object due to an absence of justification of very special circumstances, loss of agricultural land, and inadequate compensation and mitigation provided. The application is considered to conflict with the above outlined objectives.

- 9.26 Resultant harm to the Colne Valley Regional Park has been factored into the landscape impacts assessed within this section, and Green Belt impact section above. Mitigation of impacts is outlined in the infrastructure and development contributions section of this report.

#### *Coalescence and settlement identity*

- 9.27 The proposed development would inevitably result in the expansion of the urban development on the edge of Iver Heath. It would 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 also be eroded by development on Alderbourne Farm. Development sprawl would be somewhat contained by way of Black Park, existing Pinewood Studio site, road boundaries (including the M40/M25 and Uxbridge Road) and the natural boundary of Alderbourne River, restricting the extent of erosion of the gap between settlements. Even so, the gaps between settlements would be visually reduced by the proposed development however, some green separation would remain, to retain some element of settlement identity and sense of place to these settlements.

#### *Summary*

- 9.28 Overall, the proposed development would result in an adverse cumulative impact to landscape character, including impact to the Colne Valley Regional Park, visual harm to residential receptors and visual harm when taken in combination with existing development at Pinewood Studios, increasing the footprint of the existing Studios by approximately 41.9%. These visual effects relate to the loss of a connection with the countryside along the western side of Pinewood Rd, BPCP and bridleway WEX/21/1. The adverse effect, albeit localised, would be significant and long term both within the landscape and for many receptors. Therefore the proposals are considered to conflict with Core Strategy policies CP8 and CP9. Overall the harm identified would be significant attracting significant weight which will be carried forward to the planning balance.

## **10.0 Arboriculture (Trees)**

- 10.1 To inform the Arboriculture Impact Assessment (AIA) a tree survey was carried out in accordance with British Standard (BS): 5837, accompanying this AIA is a Tree Protection Plan (TPP). These were done to evaluate the direct and indirect effects of the proposed layout design on the surveyed trees and hedgerows. A method statement is also incorporated outlining measures to protect the root

protection area of trees, and methods of construction where development intrudes into these areas.

- 10.2 124 trees, 15 group trees, 2 hedgerows and 1 adjacent area of woodland were surveyed as part of the development proposals for Pinewood South (Part C). Of these, 4 trees (Nos. 1, 48, 50 and 160) were assessed as category 'U' are therefore unsuitable for retention. 12 trees were category 'A' trees (Nos. 9, 29, 31, 33, 35, 36, 40, 42, 43, 115, 165, 168) and 1 category 'A' group of trees (G4). 58 trees were category 'B' trees and 5 category 'B' groups of trees. The remaining 50 trees, 10 group trees and both hedgerows were assessed as category 'C', being either of low quality, very limited merit, only low landscape benefits.
- 10.3 The proposed development on Pinewood South would result in the removal of 1 category 'U' tree (English oak No,50) and two sections of hedgerow (Nos. H1 and H2).
- 10.4 215 trees, 33 groups trees, 4 hedges and 8 woodland areas were surveyed as part of development proposals for Alderbourne Farm (Parts A and B). 22 trees were assessed as category 'U' (Nos. 7, 12, 27, 28, 48, 106, 121, 125, 131, 133, 145, 150, 201, 219, 222, 227, 232, 236 – 237, 257, 259, 266), 2 category 'A' trees (Nos. 101, 115) and 1 category 'A' woodland (W23). 52 trees were categorised as 'B' tree and 1 category 'B' group of trees (G29) and 5 category 'B' woodlands (W1, W4, W5, W6, and W21). The remaining 133 trees, 32 groups of trees, four hedgerows and two woodlands are assessed as category 'C'.
- 10.5 The proposed development on Alderbourne Farm would result in the removal of 20 individual trees and 11 groups of trees/hedgerows with 3 hedgerows to be partially removed. All these trees are category 'C' or 'U' specimens.
- 10.6 In terms of landscaping reinforcement and replacement, for Pinewood South the plans identify a green infrastructure buffer of between 10m and 30m around the perimeter of the site. This aligns with the existing tree lines that are around the boundaries. At Alderbourne Farm, the plans identify green infrastructure around the proposed development areas which ranges from 12m to 35m plus in width.
- 10.7 It is concluded that the proposed developments would allow for the retention of all the principal arboricultural features of the sites, with only very limited removal. The assessment concludes that the scheme would not have a significant impact on the arboricultural character and appearance of the local area.
- 10.8 The Woodland Trust objected to the proposed development at Alderbourne Farm Part C, due to concerns regarding the new car park locations shown on the parameter plan for Alderbourne Farm, as this would be sited in too close proximity to Browns Wood Ancient Woodland. A 50 meter buffer between the

car parking area and Browns Wood Ancient Woodland was requested. This buffer was outlined as required for both air quality purposes and to ensure appropriate Root Protection Areas. Reference is made to the Natural England and Forestry Commission's standing advice which advises a larger buffer than 15 metres if impacts are likely to extend beyond this distance, such as the effect of air pollution.

10.9 The Council's Tree Officer commented on proposals and although no objection was raised in terms of the submitted arboricultural reports, he wished to reinforce comments made by the Woodland Trust; emphasis in this regard was placed on the requirement for at least a 50 metre buffer to be secured around Blooms Wood Ancient Woodland in order to maintain its integrity. It is noted that the 50 metre depth is not yet in legislation. The legislation change is due to be introduced through the Environment Act.

10.10 The applicant has responded to the request for a 50 metre deep buffer around the Ancient Woodland, and considers that the Ancient Woodland would have a buffer greater than 15 metre at most places. They also state that further protective boundary treatment and planting is possible. Historic fly-tipping is also highlighted as reducing the ecological value of ground flora of the edges of the ancient woodland in any event. However, Planning Practice Guidance Paragraph 033 states:

*'Local planning authorities need to consider both the direct and indirect impacts on ancient woodland and ancient or veteran trees when assessing development proposals and the scope for avoiding or mitigating adverse impacts. 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).'*

10.11 As such, noting the objection from the Woodland Trust, the proposed development does secure a 15 metre buffer around the Ancient Woodland. Overall, the evidence indicates that Blooms Wood would be enhanced by the development and any effect arising from the construction and operation of the development, particularly the car park, would be mitigated by the extent of the buffer proposed. Should there be any residual effect, it will be far outweighed by the benefits to Blooms Wood which would be secured as part of the development. The 15 metre buffer is therefore considered to be adequate in this instance, having regard to the compensation strategy put forward to ensure the long term management and maintenance of Blooms Wood. This strategy would also extend to include removing existing fly-tipping around the woodland edge, and is to be secured by condition. It is considered that overall there would be no loss or deterioration of ancient woodland having regard to paragraph 180 of the Framework.

*Summary*

10.12 On balance, although the proposed development at Alderbourne Farm Part C would maintain a buffer of 15 metres in some places, this is considered adequate having regard to the long term management and maintenance of Blooms Wood which would be secured and the overall benefit which would result to the Woodland. There would also be the removal of existing fly-tipping. As such, matters relating to Arboriculture weigh neutrally in the planning balance.

## **11.0 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)

11.1 Core Policy 13 Environmental and resource management requires new development to be directed away from existing sources of noise.

11.2 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 developments should not adversely affect the character or amenities of any nearby properties. Permission will not be granted for uses which would be, or which would have the potential to be, detrimental to the character and amenities of nearby properties or the locality in general by reason of noise, vibration, smell, pollution, disturbance, visual intrusion, loss of privacy, the impact of traffic, or other nuisance.

11.3 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.

11.4 The Framework 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.

11.5 The Framework 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.

11.6 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.

### *Pinewood South*

#### *Park Lodge and Royal Lodge*

11.7 In relation to Pinewood South, Park Lodge and Royal Lodge are located centrally with the application site surrounding these properties 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 with the Production Studios development zone.

11.8 The built form components of the proposed development comprise an outline application with matters of layout, appearance, landscaping and scale reserved for approval at a later stage. Within Chapter 7 of 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 residential areas. The assessment concludes that residents within Park Lodge and Royal Lodge would experience major adverse visual impact reducing to Moderate to Major Adverse once the vegetation buffer has developed. To put this impact into context, the proposed development would be located approximately a minimum of 70 metres away from the Production Studios Development Zone, which would comprise large scale film and tv production buildings and sound stages, of up to 21.5 metres in height (equivalent of five storeys). Although boundary treatment, at least 25 metres in depth, may help to screen views, trees would not be established to such an extent to entirely screen the proposed development. These features would mean that the nearest buildings could be 50 metres 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 loss of daylight and sunlight, or loss of privacy. Nonetheless, loss of outlook is considered to result to these neighbouring residents.

#### *Firtree Cottage*

11.9 Firtree Cottage, Pinewood Road is located to the south of the site, just outside of the site curtilage. To the north of this building, approximately 26 metres away, would be the multi-storey car parking development zone which would allow for a building up to 9.2 metres in height. Again, this would result in a loss

of outlook. Daylight and sunlight is not a significant concern due to the south, east orientation of this property in relation to Pinewood South application site. Due to 26 metre separation from the car park, it is not considered that significant noise disturbance would result to these occupiers, over and above the noise level resultant from the increased activity on the site.

11.10 Taking into consideration the above, and in line with the assessment for the previous development on Pinewood South, app ref: PL/20/3280/OA it is considered that Moderate to Major Adverse impact would result to these neighbouring residential properties as a result of the proposed development by reason of loss of outlook.

*Pinewood Manor*

11.11 Pinewood Manor is located to the south of, and adjoining, the site. Its northern boundary would be adjacent to the multi-storey car parking zone and Production Studios development zone. It is not considered that significant impact to these neighbouring residents would result from the proposed development due to location over 100 metres away from any built form. Due to this separation from the car park, it is not considered that significant noise disturbance would result to these occupiers, over and above the noise level resultant from the increased activity on the site

*Alderbourne Farm*

*Springfield Cottages*

11.12 Nos. 1 to 4 Springfield Cottages would be the closest properties to Alderbourne Farm, with their residential curtilages adjoining the south-western corner of the site. To the northern curtilage of No.4, the Production Studios Development Zone would sit just beyond the green infrastructure buffer. To the eastern curtilage of all Springfield Cottages the unrestricted backlot land would be located just beyond the green infrastructure buffer.

11.13 The built form components of the proposed development comprise an outline application with matters of layout, appearance, landscaping and scale reserved for approval at a later stage. Within Chapter 7 of 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 residential areas. The assessment concludes that residents within Springfield Cottages would experience major adverse visual impact initially, potentially reducing to moderate/major adverse after 15 years. This assumes that at least a 25m wide belt of woodland is planted and maintained so as to establish a dense belt of planting. However, even once established, the woodland would result in the loss of the open outlook from Springfield Cottages, and during winter months at least some of the development is likely to be visible from upper storeys. The proximity of these neighbours approximately 55 – 90 metres from the backlot land would result in loss of



outlook. The woodland buffer which would be immediately adjacent to these properties would also give rise to outlook and daylight and sunlight concerns, especially in the morning.

#### *Other surrounding properties*

11.14 Field End Farm would be located adjacent to the nature reserve, positioned to the north of its residential curtilage. Alderbourne Arches would also be located just beyond the northern boundary of the proposed nature reserve.

11.15 Properties to the north of Alderbourne Farm, such as Orchard Cottage and Alderbourne Arches and Field End Farm to the south east, are not considered to experience any adverse visual impact or loss of daylight and sunlight due to the degree of separation from the application site, and location adjacent to the nature reserve at Alderbourne Farm, which comprises of landscaping and habitat enhancement only, with the exception of one building to house bats, which would be located well away from the boundary with these properties.

11.16 Other properties including, Hollydene, Pine Cottage, Larkswood and Astaea located to the western side of Alderbourne Lane would face the development proposal at Alderbourne Farm, to the east but would be located over 100 metres away from built form, avoiding significant adverse impact by way of loss of outlook, daylight or sunlight.

11.17 The proposed mitigation from all residential properties would include a landscape buffer of at least 25m in depth for development on both Pinewood South and Alderbourne Farm. This landscape buffer would mean that the development zone would be approximately 45 metres away, at the closest point. Given the separation, coupled with the vegetation buffer between, the proposed buildings and adjacent dwellings it is not considered that any concerns arise in terms of loss of privacy.

11.18 However, notwithstanding the mitigation it is considered that there would be a residual detrimental impact on outlook and daylight serving residents at Springfield Cottages, and outlook serving residents at Park Lodge, Royal Lodge and Firtree Cottage.

#### *Noise and vibration*

11.19 Chapter 12 of the ES assesses the potential noise and vibration impacts of the proposed development. The assessment of this is discussed below.

#### *Construction Impact*

11.20 Construction of the proposed scheme would 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 secured via a Construction Management Plan, and it is concluded that all construction phase effects would not be significant.

## *Operational Impact*

11.21 During operation, road traffic would generate noise on surrounding roads and within the car parks of the proposed scheme itself. The assessment found that, whilst road traffic noise would increase in the locality, the contribution of the proposed development to this increase is not considered significant, given existing baseline conditions. Mitigation could include sustainability measures outlined in a Travel Plan which would reduce car use. The production studio soundstages would be built to reduce sound ingress or egress. The Proposed Scheme would also provide a backlot area at Pinewood South and Alderbourne Farm for outdoor filming activities. These activities would typically involve relatively low noise activities mostly relating to people speaking on set. There may be rare occasions where elevated levels of sound may be needed for particular movies involving special effects or the use of megaphones. A Backlot Management Plan providing control mechanisms and procedures in respect of outdoor filming activities to control noise in accordance with BS 4142 would be conditioned to ensure noise impact from backlot land use is minimised. Further mitigation measures could include noise barriers (a fence and/or earth bund) and low noise road surfacing. Therefore, operational noise from filming activities is also not considered to be significant.

11.22 The nature reserve at Alderbourne Farm is not considered to generate significant noise disturbance, by virtue of the nature of the use. The public access of the nature reserve would also be restricted at certain times, in-line with restrictions on surrounding permissive paths. The hours of opening would be at the discretion of the nature reserve management company.

11.23 Environmental Health raised no objection in relation to noise impact or the proposed prevention matters, subject to recommended conditions. It is considered that the assessment and associated surveys are acceptable in regards to noise impact.

## *Summary*

11.24 It is concluded that the scale of development is not wholly compatible with the character and amenities of the adjoining developments, Nos. 1 – 4 Springfield Cottages, Park Lodge, Royal Lodge and Firtree Cottage, in particular by virtue of loss of outlook and daylight and sunlight; therefore there is a conflict with local plan policy EP3. As the impacts to outlook would be mitigated somewhat, by way of landscaping, the moderate weight to be attributed to the residual moderate/major harm to residential amenity will be carried forward to the planning balance. The resultant harm is given higher significance than under application reference, PL/20/3280/OA (SHUK) due to the additional number of residential properties affected and increase in height, proximity and concentration of built form now proposed at Pinewood South.

## **12.0 Heritage**

## Core Strategy Policies:

### CP8 (Built and historic environment)

- 12.1 Core Policy 8 Built and Historic Environment places paramount importance on the protection and, where appropriate, enhancement of the historic environment. It states that locally important heritage features and their settings also make an important contribution to the creation of distinctive and sustainable places and will also be protected, conserved and enhanced where appropriate. This policy is not entirely consistent with the language of the Framework 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.
- 12.2 The Framework 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.
- 12.3 A Heritage Statement, and supplementary Addendum for Alderbourne Farm was submitted with the planning application.

### *Listed Buildings*

- 12.4 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.
- 12.5 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.

- 12.6 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 Pinewood South (Part C) 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.
- 12.7 The Heritage Officer raised concerns that the proposed development would obscure long distance viewpoints of both listed buildings from Pinewood Road, across the development site to the natural features of Black Park. The development would sit in the foreground of the buildings vista and erode the currently open verdant views.
- 12.8 The proposed development is therefore considered to have a negative impact on the identified settings of heritage assets and therefore would not preserve their architectural and historic interest. The resultant harm is considered to be towards the lower end of less than substantial. In making these comments, the Heritage Officer notes that the planning proposals represents a considerably intensified expanse of additional built development compared to the previous planning proposal at Pinewood South (SHUK). This would include replacing the surface level parking in the north east corner of the site with a multi storey car park and increase in building height across the entire site. This results in more intrusive spread and height of buildings which would sit more proximately in the foreground of the buildings vistas, increasing visibility above tree lines, and further eroding open verdant views with more concreted 'urban' form.
- 12.9 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 would not be affected by the proposed development.
- 12.10 The Garden's Trust and Historic England have no objection to the proposed development in respect to impact on designated heritage assets and consider that the heritage assets considered in the detailed assessment to be appropriate.

*Non-designated heritage assets*

- 12.11 Following submission of further information pertaining to the Farm House and Dove Cote on Alderbourne Farm, the Heritage Officer confirmed that there are not any non-designated heritage assets within, or in close proximity to the application sites.

12.12 The Garden's Trust and Historic England have no objection to the proposed development in respect to non-designated heritage assets.

### *Archaeology*

12.13 The Archaeological Officer was consulted on the planning application and commented that relatively little archaeological investigation has been undertaken in the vicinity of Alderbourne Farm (Parts A and B). A condition was recommended to be applied which requires the developer to secure appropriate investigation, recording, publication and archiving of the results to meet the requirements of paragraph 205 of the Framework. In relation to Pinewood South (Part C), the Archaeological Officer acknowledges that much of the site has been subject to quarrying and this activity would have significantly impacted any buried archaeological assets; however, the Environmental Statement for application PL/20/3280/OA recognised that there are small areas where ground works were not undertaken. The Historic Environment Records notes features and finds from several periods in the vicinity, and therefore areas of previously undisturbed ground, are required 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 which may lead to further investigation.

### *Summary*

12.14 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 great weight.

12.15 Overall, the proposed development would result in lower end, less than substantial harm to the setting of Little Coppice and Heatherden Hall, both of which are designated heritage assets to which great weight is given to their conservation, in accordance with paragraph 199 of the Framework. The identified harm should therefore be balanced against the public benefits of the scheme in line with national policy, and this will be dealt with later in the report. It is considered that the less than substantial harm identified represents a conflict with development plan Policy CP8 (Built and Historic Environment). In relation to other heritage assets it is considered that the development proposals preserve their setting and does not result in harm. In relation to potential archaeological interest, conditions are recommended requiring further archaeological evaluation.

## **13.0 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)

Iver Neighbourhood Plan Policies:

Policy IV8 Management Traffic

Policy IV9 Reducing Heavy Goods Vehicles

- 13.1 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.
- 13.2 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.
- 13.3 Policy IV8 of the Iver Neighbourhood Plan identifies Pinewood Green, and surrounding routes, as a location of management of traffic. These locations require public realm improvements and traffic mitigation to enhance the active travel environment and improve residential amenity and highway safety. Developments in the Green Belt are to be required to make a direct and proportionate contribution to delivering improvements to highways. Any proposal which generates an increase in traffic provision is required to contribute to public realm improvements and traffic mitigation measures infrastructure.
- 13.4 Policy IV9 of the Iver Neighbourhood Plan states that proposals for the intensification of existing businesses, that will lead to an increase in HGV movements that would have an unacceptable impact on highway safety, or which would result in a severe cumulative impact on the road network movements will not be supported.
- 13.5 The Framework 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”.
- 13.6 Paragraph 111 of the Framework states that: “Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”
- 13.7 Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”
- 13.8 All matters are reserved apart from the principal points of access.

#### *Access*

- 13.9 For Pinewood South, the access arrangement remains as per the previous planning proposal for application ref: PL/20/3280/OA. Three primary vehicular and pedestrian access points are proposed for Part C; one from the A412 Uxbridge Road and two from Pinewood Road. This would comprise a left-in/left-out junction from the Uxbridge Road entrance and two simple priority junctions from Pinewood Road.
- 13.10 As part of the proposed access arrangement from the A412 Uxbridge Road, the existing layby immediately to the west of the proposed junction would be removed. The loss of parking because of this layby closure is to be re-provided by extending other laybys on the A412 Uxbridge Road. Pedestrian footways would also be provided from the A412 Uxbridge Road, tying into existing footways; the Pinewood South accesses would also provide footways/cycleways to tie into Pinewood Road footway/cycleway.
- 13.11 For Parts A and B, the permitted access from the Sevenhills Road improvement scheme to Alderbourne Farm would be used to serve the backlots, workshops and nature reserve proposed at Alderbourne Farm. This access takes the form of a priority junction and provide a new pedestrian/cycle route from Pinewood East into Alderbourne Farm. A condition would be attached to the permission restricting use of Parts A and B on the development until the Seven Hills Road improvement is in place.

#### *Construction impact*

- 13.12 Construction traffic is anticipated to generate daily additional movements of 100 cars, 10 LGVs and 70 HGVs daily. The routes to be taken would be controlled via the Construction Traffic Management Plan. No local road would

experience an increase in daily traffic flows by more than 30%. In terms of HGV flows, Pinewood Road would experience a 50% increase in HGV movements. It is considered that this impact would be a short term adverse impact and therefore would have minor effect. Construction traffic access the sites typically before the morning peak and after the evening peak, therefore the impact to the road network by virtue of driver delays is considered to be minor. The impact from construction traffic is not considered to be significant. Submission of a CTMP is considered as mitigation of impacts during the construction phase.

#### *Operational impact*

13.13 Chapter 9 of the ES details the likely significant environmental effects arising from the proposed development in relation to transport impact. A Transport Assessment informs these findings.

13.14 The scheme's impact on the following junctions were assessed as part of the submitted Transport Assessment.

- Pinewood Road/Pinewood East Access (roundabout)
- Pinewood Road/ Pinewood West Access (roundabout)
- Pinewood Road/ Seven Hills Road (priority junction)
- A412 Denham Road/ Seven Hills Road (priority junction)
- Pinewood Road/ Pinewood Green (priority junction)
- Five Points Roundabout
- A412 Church Road/Thornbridge Road (roundabout)
- A412 Church Road/ Bangors Road North/ A412 Denhm Road (roundabout)
- A142/ Black Park Road (priority junction).
- Pinewood Road site accesses
- A412 left in/let out access
- Alderbourne Farm set access

13.15 Traffic surveys undertaken on the local highway network in March 2022 inform the baseline Average Annual Daily Traffic flows. This baseline includes improvements to Five Point Roundabout (FPR), for which a planning application is currently pending consideration; planning application ref: PL/21/4074/FA. This planning application seeks the following improvements to Five Points Roundabout:



- Controlled signal pedestrian crossings at all arms;
- Widening/ new footways to connect from the pedestrian crossings to the cycleway along Pinewood Road;
- Widening and additional lane capacity on all arms; and
- Signalised gyratory arrangement, with the exception of the A4007 Slough Road.

13.16 The improvement of FPR was a requirement of the PSDF planning permission granted on appeal in 2014 (ref. 13/00175/OUT).

13.17 The Seven Hills Road (SHR) improvement scheme mitigation which would be provided during the operational stage of the proposed development and therefore is also considered in the baseline assessment. The improvements to Seven Hills Road granted under planning application ref: PL/19/4430/FA are as follows:

- A new roundabout junction between Pinewood Road and Seven Hills Road incorporating pedestrian crossing joining public right of way network within Black Park Country Park and the footpaths/permissive paths served by Seven Hills Road;
- A new section of single carriageway to replace the existing section at the western end of Seven Hills Road in order to accommodate two way vehicular movements;
- Reduced speed limit to 30mph at the new carriageway section;
- Widening works to the remainder of Seven Hills Road to better accommodate two-way vehicle movements;
- New permissive path between Pinewood Road and the secondary entrance to Pinewood East; and
- A new pedestrian crossing on Pinewood Road in the vicinity of the Pinewood Green junction.

13.18 The proposed development is therefore reliant on both of these highway improvement schemes being implemented to mitigate the impact on the highways network. To ensure that the delivery of the development is appropriately phased with these improvements a planning condition is proposed. FPR would be required to be delivered prior to first use of any part of the development proposal. The Seven Hills Road improvement scheme would come forward subject to a trigger point assessment, which has been requested by condition through submission of a further Transport Assessment.

13.19 There is no specific location with a particular identified safety problem.

Improvements made to the junction at A412 Uxbridge Road/ Black Road to ban right turns have improved the highway safety of this aspect. A contribution of £25,000.00 towards further safety improvements at this junction is also put forward. The A412 Church Road/ Thornbridge Road junction is shown to be operating at capacity at existing baseline therefore, the financial contribution would assist in mitigating wider impacts on the A412.

13.20 In terms of operational traffic, the only large increase would result to SHR however, the improvement to SHR would cater for this. The FPR improvements would also deliver capacity benefits to the roundabout. As such, although the magnitude of change is considered to be medium there would be long term benefits to the local road network by virtue of reduced journey times and less driver delay; this also relates to traffic improvements on Pinewood Green. The impact from operational traffic is not considered to be significant and the scheme is not considered to result in a 'severe impact'.

13.21 In terms of generated trip rates the Education Hub would add 280 daily trips, the Business Hub would add an average of 327 daily trips to the road network and Studio Production space on both Pinewood South and Alderbourne Farm would add approximately 4,280 daily trips. This would result in a total (two-way trips) of 4,888 anticipated additional daily car trips and 184 HGV movements. The proposed scheme would therefore amount to fewer vehicle trips than the previous Pinewood South development (SHUK) however, a greater number of trips would be concentrated a peak hours. Due to concerns raised regarding this peak traffic impact, a legal requirement would be imposed on the planning permission restricting further build out of PSDF permission, in order to prevent further baseline creep. The PSDF permission allows for 92,836sqm of additional film studio space at the Studios which has not yet been built out. 16,554.50sqm of permitted PSDF floorspace would not come forward alongside the implementation of the current planning application. By offering this, the difference in peak movements between the permitted scheme on Pinewood South with possible PSDF full build-out, and the current proposal, would not be significant. The baseline assessment for the previous Pinewood South proposal included the full floor space permitted under PSDF. The comparison of peak hours this is shown in the table below.

**Net Change in Traffic Generation at Peak Hours**

	AM Peak 1 (07:00-08:00) Two-way	AM Peak Hour 2 (07:15 – 08:15) Two-way	PM Peak Hour 1 (17:15- 18:15) Two- way	PM Peak Hour 2 (17:30 – 18:30) Two- way
Permitted Pinewood South (SHUK) plus PSDF	492	466	537	513

permitted and Unbuilt				
Proposed scheme plus PSDF built out permissions only	758	656	671	670
<b>Net Cumulative increase in peak hour trips (Two-way)</b>	<b>+266</b>	<b>+190</b>	<b>+134</b>	<b>+157</b>

13.22 The proposed nature reserve at Alderbourne Farm is expected to generate negligible amounts of traffic because it would be used predominantly by local residents for leisure activities (e.g. dog walking) and there would be limited car parking. The traffic generation of the nature reserve is therefore not assessed further.

13.23 At the request of the Highway Authority the applicants have supplied results of sensitivity tests to demonstrate that the March 2022 surveys were undertaken on a typical day and therefore reflective of accurate trips rates and junction model capacity. The following additional technical notes were subsequently submitted:

- ITL17509-024A TN Sensitivity Test Scenario
- ITL17509-025 TN Traffic Flow Diagrams and Comparison
- ITL17509-032TN ATC Analysis and Sensitivity Test 2 Parameters
- ITL17509-030A TN Sensitivity Test 1 [2nd issue]
- ITL17509-034 TN Sensitivity Test 2
- ITL17509-037A Cumulative Impact Assessment
- ITL17509-042 Potential Internal Trips

13.24 These tested the Highway network under conditions of higher demand and background traffic levels for greater certainty of the networks ability to accommodate development traffic. The sensitivity tests also looked at volumes of traffic which could reach the wider road network, to ensure that junctions beyond the assessed network would not be impacted by the proposed development. The Highway Authority is content that the effect on the junctions beyond the assessed network would be such that there would be no change in volumes that would require assessment or mitigation.

13.25 As part of the signage strategy for the proposed development it is proposed to deliver a network of signs that would direct pedestrian and cyclists from Iver Station to the studios. The signage strategy would also direct traffic from the A412 and Pinewood South site, to use the improved SHR route. Clear signs at the M40 motorway Denham Interchange would also be provided to this effect. Details of an expanded signage strategy should be secured via S.106 agreement which includes walking and cycling routes to local services, bus stops and train stations.

#### *Sustainable Transport Measures*

13.26 A Framework Travel Plan has been submitted with the planning application this outlines local footway and cycleway improvements, signage of key walking and cycling routes, and the expansion of the existing shuttle bus service that connects the studios with nearby rail stations. The success of the Travel Plan would be monitored on an annual basis. The Travel Plan would seek to meet the following targets:

- To achieve no more than 50% of student arrivals to Centre Stage by car within three years;
- To achieve 71.3% single occupancy car use by Centre Stage staff within five years (i.e. a 10% reduction on the 2011 Census mode share); and
- To achieve 73% single occupancy car use by staff for the Studio Production floorspace within five years. This is a 10% reduction from the car driver mode share identified by the 2016 Travel Plan surveys.

13.27 The proposed scheme would also fund traffic calming measures within Fulmer and the surrounding area, as well as further safety improvements at the A412 Uxbridge Road / Black Park Road junction and footway on eastern side of Pinewood Road. This would deliver further highway benefits. A £150,000 sustainable transport contribution would be put forward to secure such measures.

#### *Parking*

13.28 Car parking is a Reserved Matter and would be dealt with by future Reserved Matter planning applications. Up to 2,480 car spaces in Pinewood South and 200 spaces in Alderbourne Farm are proposed. 5% of all parking provided for each proposed site use would be to accommodate disabled users. 5% of all parking spaces would be provided with fast electric vehicle charging points. Up to 320 cycle spaces would be provided for the proposed development, 300 to serve Pinewood South and 20 to serve Alderbourne Farm. This is considered to be acceptable, with no objection raised from the Highway Authority (Buckinghamshire Council) to this level of provision.

13.29 The Highway Authority (Buckinghamshire Council) have commented on the development proposals and have raised no objection subject to recommended conditions relating to further details of security gates, scheme phasing, speed

limited review, servicing management plan, construction management plan and other further details as requested.

13.30 National Highways have commented on development proposals and raised concerns regarding the impact to M40 motorway Denham Interchange as a result of traffic increase. The applicant submitted more information in regards to traffic flow figures for M40 Denham Interchanges and the A412 Denham Road/ Sevenhills Road junction, demonstrating that additional traffic would be modest. The net vehicle uplift through the M40 Denham Interchange has been presented, with a total of 53 two-way trips (07:00-08:00) and a net reduction in the PM peak. The peak hours presented reflect the greatest level of proposed development trips in light of staff shift patterns and therefore reflect worst case. The M40 East Bound off slip generates an additional 29 trips in the AM and a net reduction to the M40 West Bound on slip in the PM peak compared to the consented scheme. This level of additional trips would not typically warrant further modelling assessments or merge/diverge assessments. National Highways removed their objection to the scheme.

#### *Summary*

13.31 In summary, both National Highways and the Highway Authority (Buckinghamshire Council) are 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 are proposed and would not result in a severe residual impact on the safety and convenience of the highway network once the mitigation package has been delivered in its entirety. The Environmental Statement reports that there would be a number of minor adverse impacts affecting pedestrians, and road users; these are not considered significant and accompanied by moderate environmental benefits for drivers and pedestrians/community by way of highway improvements to be secured. The proposals are therefore considered to be in accordance with CS policy CP7 and local plan policies TR4, TR5, TR7, and TR10, Policy IV8 and IV9 of the Iver Neighbourhood Plan (2022) and national policy.

## **14.0 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

Iver Neighbourhood Plan:

Policy IV7: Air Quality

14.1 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.

- 14.2 Saved Policy TR5 Accesses, Highway Works and Traffic Generation, states that 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.
- 14.3 Policy IV7 of the Iver Neighbourhood Plan (2022) requires development within the Iver Parish Air Quality Management Area to contribute to the actions and objectives set out in the air quality action plan and the Iver Clean Air Zone implementation strategy. Development proposals will be required to demonstrate at least Air Quality Neutral standard during both construction and operation to avoid causing or contributing to worsening air quality. An air quality assessment is therefore required to accommodate development proposals. This policy also details further design requirements which would help to lessen impact to air quality.
- 14.4 The Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development, and minimising pollution is part of the environmental objective, one of three overarching objectives. Paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution. Paragraph 185 states that decisions should also ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects), of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site and the wider area to impacts that could arise from the development.
- 14.5 The Framework Paragraph 186 states that decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. "Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan".
- 14.6 The site is located within an Air Quality Management Area (AQMA) and an Air Quality Action Plan (AQAP) has been put in place 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.

- 14.7 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, in line with the EPUK/IAQM guidance. A verification year of 2019 has been used for assessment due to Covid 19 affecting the reliability of results.
- 14.8 During the construction stage of the proposed development, road traffic movements associated with HGVs and light vehicle movements accessing the sites are not predicted to increase concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> to sensitive receptors in excess of the annual mean objective. The magnitude of change is assessed as small (adverse) for NO<sub>2</sub> concentrations at the Aysgarth Medical Centre along Church Road and negligible at all other existing sensitive receptors. The magnitude of change is assessed as negligible at all existing sensitive receptors for PM<sub>10</sub> and PM<sub>2.5</sub> concentrations. This impact would be temporary.
- 14.9 The operation of the proposed development is considered to impact receptors with magnitude of change ranging from slight to negligible for NO<sub>2</sub> concentrations. The magnitude of change is considered to be negligible for PM<sub>10</sub> and PM<sub>2.5</sub> concentrations. There would likely to be a direct, permanent, long-term, adverse effect for NO<sub>2</sub> concentrations at Seven Hills Roads and also close to the A4020 / A40 / M40 roundabout, which is considered to be minor. There would likely to be a direct, permanent, long-term effect for NO<sub>2</sub> concentrations at all other existing sensitive receptors which is considered to be negligible. There would likely to be a direct long-term, adverse effect for PM<sub>10</sub> and PM<sub>2.5</sub> concentrations at all existing sensitive receptors however, this is considered to be negligible. Sustainable transport initiatives are considered to be sufficient mitigation for these effects.
- 14.10 Air quality affects generated by the proposed development either during construction and operation are not considered to be significant.
- 14.11 The Council's Air Quality Officer was consulted on the submitted information and raised no objection. Concerns were however, raised about the potential air quality impacts of cumulative developments in the Ivers as many individual schemes, deemed insignificant in themselves, are potentially contributing to a "creeping baseline". There is a concern that in combination the emissions of local planning developments and the National Infrastructure Projects could result in a significant increase in NO<sub>2</sub> concentrations in Iver, and also contribute towards an increase in particulate matter. The Air Quality Action Plan for the Ivers contains a number of measures that should reduce NO<sub>2</sub>

concentrations in Iver Parish. A financial contribution is therefore requested from all developments that increase concentrations within the Iver area regardless of magnitude to offset the increase and prevent baseline creep. This contribution would be put towards the Iver Air Quality Action Plan. A condition is also recommended requiring a Construction Environmental Management (CEMP) to minimise dust emissions and particulate matter emissions during construction.

14.12 Although air quality is not considered significant, there would be elevated pollutant concentrations arising from emissions from vehicle exhausts as a residual (after mitigation) impact of the development. The receptors most affected are Moat Place residential dwellings, Seven Hills Road residential dwellings and Aysgarth medical Centre. Taking into account mitigation through the financial contribution secured towards Air Quality Action Plan objectives, it is considered that adverse air pollution effect would give rise to limited harm and this is carried forward to the overall planning balance.

## **15.0 Ecology and biodiversity**

Core Strategy Policies:

Core Policy 9 (Natural environment)

Core Policy 13 (Environmental and resource management)

15.1 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 Special Area of Conservation (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.

15.2 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.

15.3 The Framework 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.

- 15.4 Paragraph 180 a) of the Framework states that when determining planning applications, local planning authorities should refuse planning permission if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. Paragraph 180 b) states that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.
- 15.5 Paragraph 182 of the Framework states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.
- 15.6 The application is supported by an Environmental Statement (ES), of which Chapter 8 relates to Biodiversity, as well as the relevant addendum containing updated ecological survey work. These provide an assessment of the proposed development in relation to the effects it would have on ecology and nature conservation.
- 15.7 The habitat on Pinewood South includes improved grassland, scrub, boundary hedgerows, mature trees and bare ground. Alderbourne Farm habitat comprises of semi-improved grassland, natural grassland, mature hedgerows, scrubs and trees, lowland mixed woodland, Alderbourne River and ditches, wet woodland and ancient woodland comprising Brown's Wood and Hawk Wood.
- 15.8 Gossams Wood, Low Farm, Rowley and Gallions Woods and Southland Manor are all Local Wildlife Sites located within 5km of the application site. The site also falls within the Colne Valley and South Bucks Heaths and Parklands Biodiversity Opportunity Areas.
- 15.9 Black Park Local Nature Reserve, Black Park SSSI, Kingcup Meadows SSSI, Denham Local Wood SSSI, Fray's Farm Meadows SSSI, Stoke Common SSSI, Mid-Colne Valley SSSI, Old Rectory Meadows SSSI and Oldhouse Wood SSSI are all national statutorily designated sites within 5km of the application site. The application site for Alderbourne Farm also falls within 5.6km of Burnham Beeches SAC. Burnham Beeches Special Area of Conservation Strategic Access Management and Monitoring Strategy applies only to residential properties,

with the conservation objective aimed to reduce recreational pressure from the building of new homes within 5.6km of the SAC. As such, the proposed development being commercial in nature, does not directly undermine the conservation objectives. Furthermore, the road network which would experience the highest uplift in vehicle movements as a result of the proposed development, would not be in close proximity to Burnham Beeches; with highest traffic increases to the eastern road network, in relation to the application site. The proposed development is therefore not considered to have an adverse effect by reason of air pollution in respect to Burnham Beeches SAC. Natural England were consulted on the planning application and raised no comment in regards to impact on Burnham Beeches. In terms of air quality, it is not anticipated that there is potential for the development to adversely affect the Burnham Beeches SAC either alone or in-combination with other plans or projects, and air quality can be screened out for further assessment at stage 1. Thus a Stage 2 Appropriate Assessment is considered not to be required on air quality.

15.10 Natural England guidelines for undertaking a HRA in relation to the effect on road traffic emissions on internationally designated sites, indicate that traffic increases of over 1000 Average Annual Daily Traffic (AADT) along the primary road network in proximity (typically <200m) to European Sites, trigger a screening threshold for which further investigation is required. Whilst this guidance is specially intended for the purposes of HRA, the general principles for air quality assessment outlined within this guidance are equally relevant for assessing road traffic emissions on national designations, including SSSIs. As the proposed development would result in 4,888 anticipated additional daily car trips, of which 1502 would be along the A412, located 80m to the southeast of Kingcup Meadows Oldhouse Wood SSSI, this would be a requirement. However, the previous proposal on Pinewood South (SHUK) considered this impact in full through further investigations and modelling work. It was considered that the proposed development would not result in an increase in nitrogen deposition on the SSSI at or above 1% critical load threshold. As such the impact would not be significant, and is considered negligible. The current proposal would result in an overall daily reduction of vehicle trips compared to SHUK and therefore the conclusions of this assessment apply equally to the current proposals. It is therefore considered that an HRA is not required.

15.11 The only other roads that would experience an increase of around 1000 AADT are Pinewood Road (between Five Points Roundabout and Pinewood Green), Wood Lane and Seven Hills Road. However, there are no SSSI are adjacent to these locations.

15.12 Following relevant survey work, the following species were found at Pinewood South:

- Breeding birds - Lapwing, Skylark and Barn Owl

- Bat roosts - Soprano Pipistrelle
- Bats
- Reptiles - Slow-worm, grass snake and common lizard.

15.13 The following species were found at Alderbourne Farm:

- Breeding birds - Red Kite, Common Whitethroat, Song Thrush, Mistle Thrush, Greenfinch, Woodpigeon, Common Whitethroat, Wren, Song Thrush, Dunnock and Greenfinch
- Bat roosts - Common Pipistrelle and Brown Long-eared Bats
- Bats
- Badgers
- Otter and Water Vole
- Reptiles - Slow-worm, grass snake, common lizard and adder.

#### *Habitat*

15.14 It is considered that mitigation by way of a Construction Environment Management Plan and landscape buffers would resolve the significant adverse effects the proposed development would have on water quality in Alderbourne River, and disturbance to the fauna. A further harmful effect would result from habitat loss, which would be off-set by habitat enhancement resulting from the proposed development; creation of a balancing pond, wet woodland and rich-grassland in Alderbourne Nature Reserve and habitat restoration within Brown's Wood. The full details of habitat to be created in the nature reserve would be secured by condition. Overall, habitat creation on Alderbourne Farm would result in significant beneficial effect.

#### *Breeding Birds*

15.15 The grassland habitat loss on Pinewood South and Alderbourne Farm would be off-set through the creation of new grassland, woodland and wetland habitats. The loss of habitat, and thereby the adverse effect on Mistle Thrush, Greenfinch, Skylark and Lapwing (across Pinewood South and Alderbourne Farm) would result in a short term significant adverse effect on breeding birds, which would change to neutral in the longer term, once the Alderbourne Farm habitat is established (2 to 5 years).

#### *Roosting Bats*

15.16 No active roosts are present on Pinewood South however, on Alderbourne Farm a total of three farm buildings were found to accommodate bat roosts, all of which would be removed as a result of the proposed development. Demolition would take place in line with a Natural England licence, and planning conditions which require details of the bat barn/building and bat

mitigation scheme to be submitted. The impact on roosting bats can also be mitigated at construction stage through the submission of a Construction and Environmental Management Plan (CEMP) and a lighting strategy. As such, no significant residual effects are considered to result.

15.17 The Local Planning Authority should have regard to the three tests that need to be satisfied before Natural England can issue such a licence; 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”.
- 3) 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.’

15.18 Having regard to the above tests, it is considered that there is an overriding public interest in the proposed development due to the fact that there are significant social and economic benefits to the development scheme including: 1. The significant economic benefits the proposal would deliver, not only in terms of the construction of the development, but the expansion of film and tv production facilities. 2.) The social benefits delivered by way of the jobs and skill package secured through the centre stage development. The proposed development is not footloose due to co-location requirement, adjacent to the existing studio site for the reasons set out in the previous sections of the report. 3.) Shared community use of the proposed buildings The Council’s ecologist considers that the provision proposed within the nature reserve, and associated bat barn, would satisfy any licence requirements. Natural England have raised no objections. It is considered that the three tests can be satisfied.

15.19 Natural England have not provided bespoke advice on the proposal’s impact to protected species within their representation, where they raise no objection to the proposed development.

#### *Foraging and Commuting Bats*

15.20 Similarly, in terms of foraging and commuting bats, retention of habitat buffers, a CEMP and outline lighting strategy and creation of a green infrastructure corridor would mitigate against any adverse effect; particularly at Pinewood South, where the northern tree line represents a key feature for the foraging and commuting of the rare Bechstein bat. As such, no significant long-term effect is anticipated.

#### *Otter and Water Vole*

15.21 No evidence of water vole was found in any of the ditches and along the Alderbourne River during the May and August 2022 surveys. Otter prints were recorded along the Alderbourne River during the August 2022 survey. Five ditches in Alderbourne Farm were found to be suitable for water vole. The proposed enhancement of the existing ditches for water vole and creation of a new ditch would off-set any potential harm.

*Reptiles*

15.22 Retention of habitat buffers, a CEMP and an outline lighting strategy would minimise the impact on reptiles. Clearing of scrub, hedgerows, tall herbs and grassland from the development site would reduce the habitat available to the common lizard and slow worm. However, the proposed new habitat would mitigate this harm. The improved habitat alongside Alderbourne River would also result in beneficial residual effect for this protected species.

*Badgers*

15.23 Badger populations are unlikely to depend upon the habitats present in the earthworks zones at Pinewood South or Alderbourne Farm. Although some habitat would be lost, in the long term Alderbourne Nature Reserve would result in an enhancement of habitat, by improving foraging opportunities. As such, a minor beneficial residual effect is considered to result for this protected species.

15.24 All residual, long term effects to the existing habitat across both sites are summarised in the table below. This table takes into consideration the implementation of the mitigation.

**Summary of Residual and Significant Effects on Ecology**

<b>Effect</b>	<b>Receptor</b>	<b>Residual Effect</b>	<b>Significant Effect</b>
<b>Construction Stage</b>			
Habitat Enhancement	Colne Valley Biodiversity Opportunity Area	Moderate Beneficial	Yes
Habitat Change	South Bucks Heaths and Parkland Biodiversity Opportunity Area	Negligible	No
Habitat Degradation and Restoration	Ancient Woodland (Browns Wood)	Minor Beneficial	Yes
Changes to Habitat Quality	Alderbourne River	Minor Beneficial	Yes

Habitat Change	Other priory and Locally Notable Habitats	Minor Beneficial	Yes
Changes to Habitat Quality	Breeding Bird Assemblage	Negligible	No
Loss/abandonment of Bat Roosts	Bats	Negligible	No
Disturbance and Habitat Change affecting commuting and foraging bats	Bats	Negligible	No
Disturbance and Habitat Change	Reptiles	Minor Beneficial	Yes
Disturbance and Habitat Change	Badgers	Minor Beneficial	Yes
<b>Operational Stage</b>			
Habitat Degradation due to Air Quality Changes	Kingcup Meadows and Oldhouse Wood SSSI	Negligible	No
Habitat Enhancement	River Alderbourne Eat of Fulmer Biological Notification Site	Moderate Beneficial	Yes
Habitat Enhancement/Disturbance	Colne Valley BOA	Moderate Beneficial	Yes
Habitat Enhancement/Disturbance	South Bucks Heaths and Parklands BOA	Negligible	No
Change to Habitat Quality	Ancient Woodland (Browns Wood and Hawk Wood)	Minor Beneficial	Yes
Change to Habitat Quality	Alder Bourne River	Minor Beneficial	Yes
Change to Habitat Quality	Breeding Bird Assemblage	Minor Beneficial	Yes
Disturbance and Changes to Habitat Quality at Roosts	Bats	Minor Beneficial	Yes
Disturbance and Changes to Habitat Quality of	Bats, including Bechstein's Bats	Minor Beneficial	Yes

Foraging and Commuting Habitat			
Disturbance	Badgers	Negligible	No

15.25 In summary, it is considered that most adverse effects will be short term and, with the mitigation proposed, there will, in the longer term, be betterment.

15.26 Mitigation for the construction phase of the proposed development would take the form of a Construction Environment Management Plan, but mitigation statement and implementation of the green landscape buffer as shown on the submitted Parameter Plans for each site.

15.27 Mitigation for the operational phase of the proposed development would include measures to reduce emissions to air, water and light pollution. The long term management of habitats and Green Infrastructure provision is also required. An outline lighting strategy was submitted with the planning application which outlines measures to reduce light overspill and bright illumination on habitats. A more detailed landscape strategy would be secured by condition. Details of a drainage strategy and long-term landscape management would also be requested by condition. Such details would provide new, varied ecological habitat.

15.28 To summarise, mitigation which would be secured by condition are as follows:

- Green infrastructure boundaries of 15-30 metres in depth on Pinewood South and 10m to 25 metres in depth on Alderbourne Farm- secured through Parameter Plans;
- Provision of green infrastructure corridors - secured through Parameter Plans;
- Habitat enhancement on Alderbourne Farm Nature Reserve – secured by condition;
- Tree retention - condition of arboricultural reports;
- Landscaping and tree planting - secured by landscaping condition;
- Sensitive lighting design - secured by lighting strategy condition;
- Construction Environmental Management Plan to mitigate against environmental effects throughout the construction phase would be secured by condition;
- Bird nest box scheme, to be secured by condition;
- A bat mitigation scheme including provision of alternative roosts, to be secured by condition; and

- Landscape and Ecological Management Plan - to be secured by condition.

15.29 It is anticipated that a Biodiversity Net Gain would be secured at Alderbourne Farm with net gains of 26% for habitats, 21% for hedgerows and 30% for river enhancement likely to result from the development proposal. This is clearly a significant uplift in the local biodiversity resource, delivering significant benefit. Full details of habitat enhancement are to be secured by condition.

15.30 The submitted landscape strategy for Alderbourne Farm has informed the inputs for the Biodiversity Net Gain (BNG) metric for the development proposals in accordance with CIEEM guidelines and the British Standard on Biodiversity. The submitted BNG Report and Biodiversity and Green Infrastructure Reports also outline the inputs and baseline used. Habitat enhancement that is proposed to be introduced would include, traditional orchard, heathland and shrub, woodland planting, wet woodland, ponds and grassland.

15.31 The Council's Ecology Officer was consulted on the proposed development and raised no objection subject to conditions. The Officer's comments pertained to the scope to mitigate the effects of both development site proposals by habitat creation and enhancement within the new nature reserve at Alderbourne Farm; and conditions requesting a Construction Environmental Management Plan, Ecological Management Plan, lighting strategy, net-gain details, and management details relating to the nature reserve. The details that would come forward will provide for would be inaccessible to the public in order to retain high quality biodiversity.

#### *Summary*

15.32 The scale of development is such that it would result in ecological impacts and a number of adverse effects have been identified through the Environmental Assessment, these can be mitigated to ensure no adverse residual affect. Overall it is considered that the proposed development on this site is possible whilst mitigating and compensating for impacts on protected, priority and notable species and habitats and delivering a net gain in biodiversity. The proposal is 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.

## **16.0 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

Iver Neighbourhood Plan Policy:

IV15: PassivHaus Building



- 16.1 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.
- 16.2 Policy IV14 of the Iver Neighbourhood Plan requires all development to be 'zero carbon ready' by design. All buildings should be certified to a Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m<sup>2</sup>/year. Planning applications are required to be accompanied by a Whole-Life-Carbon Emissions Assessment and Energy Statement.
- 16.3 The Framework 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.
- 16.4 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 and Energy Statement and Energy document setting out a commitment to sustainable development.
- 16.5 Mitigation measures for the construction stage of the proposed development would include a Site Waste Management Plan in order to reduce general construction waste arising, and a CEMP which would manage general environmental related effects during the construction stage.
- 16.6 At operation stage, proposed mitigation would incorporate the following energy efficiency and carbon reduction measures into the proposed building design, namely:
- Accordance with the energy hierarchy;
  - BREEAM 'Very good' standard scheme, with aspiration to target the Excellent level credits in energy and water;
  - A "fabric first" approach with building envelope performance beyond the minimum backstop requirements of the Building Regulations Part L 2021;
  - 100% low energy (LED) lighting;

- Use of measure to reduce onsite water consumption;
- High efficiency gas boilers or low carbon heat pumps; and
- 10% of the site's energy demand would be delivered through low carbon or renewable energy technology.

16.7 It is considered that the construction of the proposed development would generate a total of 32,540 tCO<sub>2</sub>e, (additional tonnes of carbon dioxide emissions above existing assumed business as usual emissions for Pinewood Studios) of Green House Gas (GHG) per year. Construction of the buildings is estimated to result in a total GHG emissions of 97,620 tCO<sub>2</sub>e, over the three year construction period. This would equate to circa 1.26% of Buckinghamshire total emissions. Taking the carbon emission generated by each building separately, embodied carbon emissions would be below the RIBA targets for 2025; with the exception of the workshop buildings which would be slightly above this. The proposed development's construction GHG emissions are therefore considered to be consistent with current and emerging good practice and would contribute to meeting the UK's net zero trajectory target. There is therefore considered to be minor effect on climate change, which is not significant.

16.8 The GHG emissions from operation of the proposed development are considered to be 1,224 tCO<sub>2</sub>e, annually, this would equate to circa 0.05% of Buckinghamshire's total baseline emissions. The proposed development's operational energy demand would also be below the RIBA 2025 target. The operational effect is not considered to be significant.

16.9 The sustainable transport strategy would also help promote sustainable transport links to the site, over car use, which would further assist in reducing carbon emissions generated by the proposed development.

16.10 The Council's Climate Change Officer reviewed the ES chapter and relevant accompanying information, and raised no objections to the proposed works however, given the outline nature of the planning applications, further details would need to be submitted as part of any reserved matters application. Conditions requesting this further information are recommended. These conditions include preparation of a Materials and Waste Management Strategy, Site Waste Management Plan and Whole Life Carbon Study.

16.11 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 Core policies CP8, CP12 and CP13 and national planning policy in respect of climate change and low carbon infrastructure and energy use.

## **17.0 Flood risk and drainage**

Core Strategy Policies:

CP13 Environmental and resource management

- 17.1 Core Policy 13 Environmental and resource management, states that new development must be water efficient and incorporate Sustainable Drainage Systems (SuDs) where feasible.
- 17.2 The Framework 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. The Framework 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).
- 17.3 A Flood Risk Assessment (FRA) and Drainage Strategy, as well as an additional technical note, has been submitted in relation to Alderbourne Farm and Pinewood South. 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 would be designed such that there would be 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.
- 17.4 Pinewood South has records of superficial geology under the site in the presence of Sand and Gravel and Clay Silt and Sand. Infiltration is not recommended on the site due its former quarry use. Pre-quarry the site was in a high risk surface water area however, due to landfill and restoration there has been a change to ground levels so that the site is now categorised as being at low flood risk. As such, a sequential test is not required. This has been confirmed by the Lead Local Flood Authority.
- 17.5 As the proposed site of Pinewood South is classed as 'Greenfield', the surface water flow from the site would be restricted to greenfield runoff rate. The proposed run off rate is approximately 1.7l/s/ha. The design would consider an allowance of 40% climate change on peak rainfall intensity for calculations. The strategy proposes to utilise the existing watercourses within close proximity of the site as a means of surface water discharge. Due to the site topography, pumping station(s) would likely be required to convey surface water from some areas of the site. Water would be discharged via four surface water outfalls and then into watercourse(s). The drainage strategy would be developed as part of the detailed design stage.

- 17.6 The Lead Local Flood Authority (LLFA) have no objection to the proposed outline arrangement for Pinewood South, confirming accordance with the drainage hierarchy and subject to requested further details by condition.
- 17.7 In relation to Alderbourne Farm, ground deposits of sand and gravel, winter hill gravel and London Clay Formation can be found within the development area. Due to the nature of the site and existing constraints, infiltration is not recommended for the entirety of the site due to the risk of contamination. The application site also comprises high risk fluvial flood zones 2 and 3, and areas of high surface water flood risk around the Alderbourne River. A sequential test is however, not required as there would be no built development in these flood zones, and a sequential test is not required for change of use applications for the uses proposed, in accordance with footnote 56 of the Framework (2021).
- 17.8 LiDAR data was used to determine the flow routes and catchments within and adjacent to the site. It was confirmed that there is a single catchment within the existing site for the Alderbourne Main River. Using this plan, the proposal is to utilise a single surface water outfall into an existing watercourse connected to the Alderbourne Main River. As the proposed site is classed as 'Greenfield', the surface water flow from the site will be restricted to greenfield runoff rate. The proposed run off rate is approximately 8.731l/s. An allowance has been made for 40% climate change on peak rainfall intensity. Due to the site topography, it is anticipated that surface water would discharge into the existing watercourse via a piped gravity connection. The required attenuation would be achieved by provision of an attenuation basin north of the proposed developable area. Impermeable surfaces would drain to this via pipe networks and filter drains. A hydrobrake would be installed downstream of the pond prior to discharge into the existing watercourse within the site boundary. The same arrangement would apply to the proposed backlot sites.
- 17.9 The LLFA reviewed this information and considered that the proposed surface water drainage arrangement and design was acceptable for Alderbourne Farm subject to consent from the LLFA for connection. Conditions would be attached to the grant permission, as recommended.
- 17.10 Maintenance for the drainage networks within both sites would be incorporated into the S.106 agreement to ensure lifetime maintenance; maintenance would follow the maintenance schedule as submitted within the drainage strategies.

#### *Foul Drainage*

- 17.11 Development on Pinewood South would utilise connection to the public sewerage network along Uxbridge Road/ Pinewood Road via a conventional piped system.

17.12 The proposal for Alderbourne includes collecting the foul drainage from each building via a conventional piped system. As there are no nearby Thames Water assets, there are two proposed options to manage the foul effluent outfall from the site:

- Option 1: Install pumping station and rising main connection to foul network within the existing Pinewood East development. This option needs to be further explored and reviewed through close consultation with the applicant and Thames Water.
- Option 2: Suitably sized sewerage treatment plant with discharge into the Alderbourne through close consultation with the Environment Agency.

17.13 Thames water commented on the proposed development and raised concerns regarding the sewerage network capacity to accommodate the proposed development. As a consequence, a condition is recommended requesting details of phased connection into the public sewage so that Thames Water could appropriately plan and allocate infrastructure provision, as and where it may be required.

## **18.0 Ground Conditions, Minerals Safeguarding**

Minerals and Waste plan

Policy 1: Safeguarding Minerals Resources

Policy 25: Delivering high quality restoration and aftercare

Policy 26: Safeguarding of Minerals Development and Waste Management Infrastructure

18.1 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.

18.2 Policy 1 of the Buckinghamshire Minerals and Waste Plan (2019), defines mineral safeguarding areas within Buckinghamshire in order to prevent mineral resources of local importance from being needlessly sterilised by non-minerals development. A Minerals Assessment is required to accompany any planning application in a safeguarded area. Proposals for development within MSAs, other than that which constitutes exempt development, must demonstrate that:

- Prior extraction of the mineral resource is practicable and environmentally feasible and does not harm the viability of the proposed development; or
- The mineral concerned is not of any value or potential value; or
- The proposed development is of a temporary nature and can be completed with the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or

- There is an overriding need for the development

18.3 Policy 26 of the Buckinghamshire Minerals and Waste Plan (2019), states that waste management sites with extant permission and associated infrastructure are safeguarded. Proposals for other forms of development within a site safeguarded for waste development will be permitted where it can be demonstrated that:

- An alternative site could be provided that would be as appropriate for the use as
- The safeguarded location without significant interruption to operations and (for waste management) can service the existing catchment area; or
- There is no longer a need for the facility in either the vicinity or the wider area as appropriate.

18.4 The Framework 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 Framework 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.

18.5 Pinewood South is a former quarry in the process of being remediated 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.

18.6 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. The geo-environmental preliminary risk assessment undertaken for the site indicates a general low to moderate risk at Pinewood South. Whilst the investigations and assessments may identify that some remediation may be required to support the development of Pinewood South, based on the site history it is anticipated that this is likely to comprise of typical remediation requirements for the redevelopment of brownfield sites such as ground gas protection measures and the installation of capping layers.

18.7 For Alderbourne Farm there is no formal record of contamination of waste disposal by landfill however, some areas of filled land are visible. It is proposed that if these areas, and any others, become apparent they must be treated and remediated. A condition is recommended to secure this. It is considered that when factoring in site constraints, such as existing built form on Alderbourne Farm, adjacent residential properties and ancient woodland, the only extractable area comprises the largest backlot land site, circa 2.5ha. Although it is considered that mineral below this area may be rich and viable to extract,

the need for the development to be delivered in a timely manner, and the significant economic benefits it would deliver, overrides the economic benefit of extracting this mineral. For this reason, extraction of the mineral is not considered appropriate in this instance, and the sterilisation of this potential mineral resource below ground is carried over in the planning balance, with moderate weight attached.

- 18.8 Alderbourne Farm also received permission for a Green Waste Composting Facility; allowed at appeal, APP/P0430/C/16/3152361-2. This permission related to existing unlawful activities already taking place on the site, and therefore was not subject to a time restriction. Nonetheless, the permission dates the 14<sup>th</sup> May 2018. The attached pre-commencement conditions, such as details relating to site odour management, were never discharged. This would indicate permission to lawfully use the site as a Green Waste Composting Facility was never implemented. Moreover, there is no evidence of this activity, or residual activity, taking place on the site. For this reason, it is considered that Policy 26 does not apply as no operations relating to waste activity have taken place on the site for the past 5 years.
- 18.9 Both the Environment Agency (EA) and the Environmental Health Officer (Contamination) were consulted on the planning application. The EA outlined that the northern entrance to Pinewood South would be located directly on top of Monitoring boreholes GWM01 and GWM10 and the southern access would also destroy GWM07. These locations are critical to the monitoring and assessment of the risks posed by these landfills. These monitoring locations would need to be relocated in line with the requirements of the environmental permit before any work could proceed in establishing new access points. An informative in respect of this point is recommended.
- 18.10 The EA also outlined that the proposal fails to recognise that although the active operations in the landfill have ceased, this activity (and waste) remains present at the site and there is ongoing processes, reactions, maintenance and monitoring required for this regulated landfill. This can be managed in a way that is compatible with the proposed development, if the development recognises the continuing presence of the waste on the site and incorporates this into the proposal design at Reserved Matters Stage.
- 18.11 As the site develops, the exact location of structures is a concern and buildings should be sited to avoid the geological barriers and landfill monitoring boreholes. This has not been considered in the design and access statement or as part of the landscape and Ecological Design or within the Parameter Plans. Some proposals for the layout may not be practical given the limitation of the current below ground uses. An informative is recommended in respect of this point to guide development design as it develops.
- 18.12 Ground conditions and contamination were scoped out of the ES as a review of permitting that has established that fill has been largely inert and risks are considered to be low. The risks of contaminated soil dust exposure would also

be reduced to low risk through excavation and off-site removal of soil and through encapsulation beneath hardstanding on completion of the works. Any effects of contaminated dust are not considered significant. The risk from ground gases and mobilising contaminants via excavation are considered to be low following mitigation measures, via a CEMP. The risks associated are therefore not considered to be significant.

18.13 The Contaminated Land Officer has requested conditions requiring remediation against potential contamination (if identified).

#### *Summary*

18.14 The development is considered to be policy compliant in respect to land contamination. The sterilisation of potential mineral resource carries moderate negative weight in the planning balance.

### **19.0 Environmental assessment matters**

Core Strategy Policies: Core Policy 6 (Local Infrastructure Needs)  
Core Policy 13 (Environmental and resource management)

#### *Agricultural Land*

19.1 The Framework, at paragraph 174 b) notes the benefits of protecting the best and most versatile agricultural land (BMV). The footnote to paragraph 171 also states “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”. The glossary of the Framework gives the following definition. “Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.” In assessing the effects of the development on agricultural land it is necessary to have given consideration to the Agricultural Land Classification (ALC), devised by Ministry of Agriculture Fisheries and Food (1988). This is the standard method used for determining the quality of agricultural land.

19.2 Pinewood South 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.



- 19.3 The development at Pinewood South 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.
- 19.4 Alderbourne Farm, although also comprised of agricultural land, does include any BMV agricultural land and therefore no conflict to planning policy in regards to loss of BMV would result on this part of the site.

#### *Materials and Waste*

- 19.5 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 are not considered within the ES. As part of the detailed design and subject to Reserved Matters approval, a Materials and Waste Management Strategy would 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 condition.

## **20.0 Infrastructure and developer contributions**

Core Strategy Policies:

CP6 -Local infrastructure needs

Local Plan Saved Policies:

T4 -New built development to provide tourist facilities

- 20.1 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.
- 20.2 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 measures set out below are required to be secured within a section 106 agreement in order for the proposed development to be acceptable.

#### *Travel Plan Provisions*

- 20.3 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.

### *Black Park*

20.4 A contribution of £25,000 for improvements to footpath, cycleway and bridleway links to Black Park

### *Bat mitigation: Woodland Management Contribution*

20.5 A financial contribution of £30,000 to fund Woodland Management measures within Black Park to improve the habitat for Bechstein bats.

### *The Sustainable Transport Contribution Provisions*

20.6 A contribution of £150,000 towards the costs of implementing measures to promote the use of sustainable transport.

### *The Air Quality Management Contribution Provisions*

20.7 A 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*

20.8 £150,000 as a contribution towards the costs of implementing measures to calm traffic flows and ease congestion in Fulmer in the vicinity of the development site.

### *Traffic Calming in Iver Provision*

20.9 £250,000 as a contribution towards the costs of implementing measures to calm traffic flows and ease congestion in Iver Heath in the vicinity of the development site.

### *Wood Lane footpath/cycleway and/or sustainable transport scheme*

20.10A sum of £500,000 would be reallocated towards the Wood Lane sustainable transport scheme which was agreed mitigation for PSDF, yet to be implemented.

### *Iver Cycleway*

20.11 A sum of £600,000 would be allocated towards provision of new cycleways in Iver and Iver Heath.

### *Shuttle Buses*

20.12 The number and frequency of buses (including seating arrangement) to be increased once the Film Production Facilities are occupied, if required.

### *Sevenhill Road Improvement Scheme*

20.13 Planning permission for the Sevenhills Road Works issued by the Council on 4 August 2021 under the Council's reference PL/19/4430/FA, to be implemented within an agreed timeframe.

*A412/Black Park Road junction safety contribution*

20.14 A contributions of £25,000 towards safety improvements in proximity of the Black Park/A412 junction

*Pinewood Road Footway*

20.15 Construction of a new footway on the eastern side of Pinewood Road between the Pinewood East roundabout and Sevenhills Road.

*Signage Strategy*

20.16 Details of signage to be erected on the public highway and sum that equates to the cost of implementing and completing the signage scheme as set out.

*Traffic Regulation Survey*

20.17 Review of the Traffic Regulation Order Survey, carried out by the applicant, provision of a £30,000 required for making and implementing any traffic regulation order that is required to give effect to any change in the prevailing speed restriction on Pinewood Road;

*Education Hub and Business Growth Hub Provisions*

20.18 To make the land and building 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.

*Peace Path Improvement*

20.19 Improvements to the Peace Path for use as footpath and cycleway.

*Summary of Highway Improvement*

- Provision of a footway along Pinewood Road from Pinewood West entrance to Fulmer Common Lane;
- Cycle route between Pinewood Studios and Iver Station;
- Cycle route between Five Points Roundabout and Bangors Road North along the A4007;
- Wood Lane footpath/cycleway and/or sustainable transport scheme;
- Enhancement of existing shuttle bus service;

- Fulmer traffic calming and management;
- Road signage improvements;
- Iver traffic calming and management;
- A412/Black Park junction safety improvements; and
- Seven Hills Road improvement scheme.

#### *Local Economic Benefits Provisions*

##### 20.20 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; and
- to prioritise opportunities for local businesses to supply goods and service

#### *Aldbourn Farm Nature Reserve*

20.21 A scheme to create a nature reserve with public access. Funding to be provided to maintain the nature reserve for a 30 year period. Although this ecological betterment has been considered a benefit of the scheme, it is required for mitigation of ecological habitat and wildlife displacement, as well as for Biodiversity Net Gain off-setting.

20.22 The South Bucks and Chiltern Council's open space strategy highlights that the South Bucks District is particularly well-provided with Parks and Gardens. The District is privileged to have access to a number of sites of at least national significance. These include the Cliveden Estate and Burnham Beeches. These sites are accessible to the public. By 2036 there is predicted to be an oversupply in parks and gardens in the South Bucks District of 838.0 ha. Within Iver, residents have good access to a Park and Garden within walking distance. Due to the site's proximity to Burnham Beeches and Black Park a further publicly accessible nature reserve would not add significant value to residents. Moderate weight is given to the provision of a publically accessible 25.6ha nature reserve and its long-term maintenance. This will be factored into the planning balance.

20.23 The following is a summary table of obligations to be secured by the proposed development:

**Summary of obligations**

	<b>Contribution</b>
<b>1. Travel Plan</b>	
a. Operate shuttle bus service with possible pro-rata increase as film production facilities increase	Cost of works and monitoring costs
b. Travel plan implementation and monitoring	£5k (for 5 years and if targets not meet will be extended).
<b>2. Delivery of sections 1 and 2 of cycle Route 2 (Ivers Cycleway Options Development Report)</b>	£988.3k- To comprise: - Ivers Cycleway Contribution of £600k - £500k (increased by index-linking to £520k) carried over from PSDF, for Wood Lane part of Cycleway
<b>3. Seven Hills Road improvement scheme</b>	Cost of works
<b>4. Fulmer Traffic Calming improvements</b>	£250k
<b>5. Iver Heath Traffic Calming improvements</b>	£250k
<b>6. A412/Black Park Road junction safety contribution</b>	£25k
<b>7. Pinewood Road footway</b>	Cost of works
<b>8. Sustainable transport (SHUK) contribution</b>	£150k

<b>9. Peace Path footpath improvements</b>	Cost of works
<b>10. Black Park footpath improvements</b>	£25k
<b>11. Signage strategy</b>	Cost of works
<b>12. Traffic Regulation Survey</b>	Survey and if TRO required to TRO contribution of £30k
<b>13. Centre Stage</b>	To market and build both hubs to shell and core if occupier found and to lease them at market rent
a. Education hub	
b. Business growth hub	
<b>14. Local economic benefits</b>	Jobs, Skills and Services Programme to be delivered - £2,125m capped spread over a five year period
a. NFTS bursaries	
b. Direct employment	
c. Work introductions – Placement, taster days	
d. Traineeships	
e. Apprenticeship programme	
f. Career development initiatives	
<b>15. Target employment opportunities for the least advantaged – in most deprived wards</b>	
<b>16. Partnership connections</b>	
<b>17. Education outreach</b>	
<b>18. Leadership and delivery</b>	
a. Coordinator (full-time)	

b. Running costs	
<b>19. Priority offers for local jobs and services in construction and operational roles</b>	
<b>20. Promotion of job opportunities with users and occupiers of the site</b>	
<b>21. Nature Reserve at Alderbourne Farm</b>	Provision of nature reserve for public access
<b>22. Habitat mitigation Provisions</b>	£30k
<b>23. BNG monitoring contribution</b>	£35,400
<b>24. Air quality management contribution</b>	£150k
<b>25. SuDs features management and maintenance</b>	Cost of works

20.24 The above obligations sought are necessary and proportionate, and 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.

## **21.0 Performance against the Development Plan and Overall Balance**

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 four principal elements, The Productions Studios, the Education Hub, the Business Hubs (Centre Stage) and 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.

*Other considerations and planning balance:*

21.6 Paragraph 11 of the Framework 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 Framework 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 Strategy Policies 7, 9, and 10 and Saved Local Plan policies GB1, GB4, EP3, EP4 and TR5. Overall, the suite of development plan policies is considered to be up-to-date. Of these most policies, the proposed development would fail to accord with Core Strategy Policies 9 and 10, and Saved Local Plan Policies GB1, GB4, EP3 and EP4. The proposed development would be in compliance with Core Strategy Policy 7 Saved Policy TR5 of the Local Plan.

21.8 The Framework 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'. It is also clear that unless and until Very Special Circumstances are demonstrated, even were the policies most important for determining the application to be out of date, the tilted balance referred to in paragraph 11 of the NPPF is not engaged (by reason of NPPF footnote 7).

21.9 Paragraph 148 of the Framework 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.”

21.10 Development should be regarded as inappropriate in the Green Belt except in specified exceptions as set out in Framework 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 Framework and contrary to policy GB1.

#### *Green Belt and other harm*

21.11 *Green Belt:* The proposed development would constitute inappropriate development and would result in spatial and visual harm to the openness of the Green Belt. It would result in substantial urbanising development and encroachment into the open countryside. In addition, the proposals would lead to a conflict with two out of the five Purposes of including land in the Green Belt. The proposal would not accord with Policies GB1 and GB4 of the Local Plan and the Framework. The harm to Green Belt openness is substantial and this is afforded very substantial weight.

21.12 *Design:* The scale, character and appearance of the proposed development is such that high quality place making would not be achieved. Nonetheless, the appearance of the scheme is typical for film and tv production and would not be out of character with the adjacent development at Pinewood Studios. The proposed development would therefore be contrary to Policy CP8 of the Core Strategy, Saved Local Plan Policies EP3 and EP4 and Policy IV2 of the Iver Neighbourhood Plan. Limited weight is attributed to this identified harm.

21.13 *Landscape:* The scale and extent of the development is such that there would be adverse cumulative landscape and visual effects in combination with existing development at Pinewood Studios. These effects relate to the loss of a connection with the countryside along the western side of Pinewood Road, Black Park Country Park and bridleway WEX/21/1. The adverse effect would be significant and long term for many receptors, conflicting with Policies CP8 and CP9 of the Core Strategy Saved Local Plan Policies EP3 and EP4 and Policy IV13 of the Iver Neighbourhood Plan. This harm is afforded significant negative weight.

21.14 *Residential amenity:* The development would have a transformative effect on the setting of several residential dwellings and result in harm in terms of outlook, noise and disturbance. These impacts would to an extent be mitigated through the detailed design process, by landscaping and environmental controls to be secured by condition. However, there would remain some residual amenity effects on neighbouring residents contrary to Core Strategy

Policy 13 and Saved Local Plan Policies EP3 and EP5. Moderate weight is afforded to this harm weighing against the development.

21.15 *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, any significant adverse effect would be substantially mitigated through a financial contribution secured towards the AQAP objectives. On balance, it is considered that the residual adverse air pollution effect amounts to limited harm. The proposed development therefore fails to accord with Core Strategy Policy 13, Saved Local Plan Policies TR5 and TR10 and Iver Neighbourhood Plan Policy IV7.

21.16 *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 Framework paragraph 199 and would conflict with Core Strategy Policy CP8.

21.17 *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 is afforded very limited negative weight in the planning balance.

21.18 *Loss of Minerals*: There is potential for rich mineral resource of sand, gravel and clay under Alderbourne Farm. The proposed development at Alderbourne Farm (Part B) would sterilise the ground, preventing possible mineral extraction now and in the future. The need and associated economic benefits of the proposed development is considered to override the benefit of extracting this mineral. Moderate weight associated with the permanent loss of this mineral resource, contrary to Policy 1 of the Minerals and Waste Local Plan, is therefore attributed against the planning application.

### *Benefits*

21.19 The applicant has set out material considerations to justify the proposed development and a granting of planning permission, these are:

21.20 *Economic*: 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 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 and stimulating demand would support local, regional and national recovery. The business and education hub would also provide opportunities for training and skill development at time of skill shortage in the sector. Adverse harm by way of not approving the development also needs to

be considered. Together, these benefits carry very significant weight and clearly align with local and national economic growth and recovery strategies.

21.21 *Community/ Social (arts/culture/ education)*: Moderate weight is attributed to this benefit based on provision of the publically accessible nature reserve, the health and social well-being benefits of the scheme in terms of job delivery and skill development opportunity, and community use of buildings.

21.22 *Biodiversity*: The proposed development through delivery and creation of a nature reserve would result in significant uplift in biodiversity, over and above policy requirement. This carries significant weight in favour of the scheme.

21.23 *Nature Reserve*: The delivery and transfer of a publicly accessible nature reserve to be retained in perpetuity is considered to carry moderate weight in favour of the proposed development.

21.24 *The applicants' very special circumstances*: the applicant has also put forward the following points as other considerations to weigh in the planning balance:

- Contributions to leading economic recovery and growth;
- The implementation of economic strategy;
- The geographically fixed location of Pinewood Studios (there is not a choice of location);
- Environmental benefits;
- Community benefits;
- Contribution to arts and culture;
- The National Planning Policy Framework;
- S.106 contributions; and
- The legal fall back.

21.25 The Contributions to leading economic recovery and growth, implementation of economic strategy, environmental benefits, community benefits and arts and culture have been addressed and weighted above and therefore do not need to be recounted.

- *The geographically fixed location of Pinewood Studios:*

21.26 The provision of additional floorspace for film production represents an expansion of existing capacity at Pinewood. 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). The business and education hubs are also 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). The proposed development is therefore considered to be strongly related to the specific Pinewood site/location. This is already factored into the economic benefit above.

- *The National Planning Policy Framework*

21.27 Reference is made to the sustainability credentials of the proposed development in relation to the means of sustainable development for the purposes of paragraph 7 of the Framework. The economic, social and environmental impacts of the proposed development have been discussed and assessed above as policy requirements, and will not be revisited here. Meeting policy weighs neutrally in the Planning balance.

- *S.106*

21.28 As discussed above, the s.106 contributions are required mitigations which comply with the tests of the CIL regulations in terms of being related, proportionate and necessary to the permission granted. The highway improvement works, active travel contribution and other such measures are therefore necessary to mitigate the impacts of the proposed development and have already been taken into account above.

- *The legal fall-back*

21.29 The fall-back position on Pinewood South for the SHUK permission, approved under application ref: PL/20/3280/OA is noted and has been factored into the assessment of the development proposal in terms of harm and benefits to ensure consistency. It is not however, considered that there is a reasonable prospect of the previous development proposal being implemented due to the amended submission and wish to no longer have a visitor attraction on the site. As such, the previous permission on Pinewood South carries neutral weight in the planning balance as a fall-back position, although the studio space previously permitted is considered a material consideration in the sense that it indicates what the Council has already found to be acceptable on the site.

21.30 In summary, the proposed development is of national significance in terms of developing the strengths of Pinewood Studios in UK film production and delivering very 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 and stimulating demand would aid local, regional and national recovery. The education and business hub goes some way towards addressing the skill shortage in the sector. These benefits are very significant and clearly align with local and national economic growth and recovery strategies. These

are attributed substantial weight. When attributing this weight community benefit, well-being and contribution to arts and culture is factored. The proposed development is considered to be strongly related to the specific Pinewood site/location. This is attributed significant positive weight. BNG is afforded significant weight and the nature reserve is attributed moderate weight.

#### *Planning Balance*

#### *Listed Building Harm*

21.31 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 Framework paragraph 199. As outlined above, there would be public benefits in relation to the economic, social, community and environmental aspects. These benefits carry very substantial weight in totality. The view of Officers is therefore that the potential public benefits of the scheme would very substantially outweigh the harm identified to the setting of the heritage assets.

21.32 It is considered that the other considerations put forward in favour of the development collectively carry a very substantial amount of weight in favour of the proposal. In the view of Officers the adverse impact of granting permission, are clearly outweighed by the benefits upon which the Appellant relies; Very Special Circumstances do therefore exist in this case. This judgement has been made taking into account the economic benefit the expanded Pinewood would deliver to both the National and Local economy, and with particular regard to previous appeal decision at PSDF, and national and regional strategies. It is therefore considered that other material considerations clearly outweigh the conflict with the development plan. 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*

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

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

## **22.0 Recommendation**

22.1 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 publicity of proposals affecting the setting of listed buildings, provided no new substantive planning reasons for refusal arise following completion of the consultation period, and the 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:

### **Part A - Full Planning Permission Alderbourne Farm Nature Reserve**

#### **Time Limit**

1. The development hereby approved must be commenced no later than the expiration of five years from the date of this permission.

Reason: To comply with the provisions of Section 91(1)(a) of the Town and Country Planning Act 1990.

#### **Approved Plans**

2. The development shall be carried out in substantial accordance with the approved plans, listed below:

- Site plan 3939-FBA-02-00-DR-A-01 110 P01

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

#### **Design**

3. The development hereby permitted shall not commence until a detailed design scheme for the construction of the nature reserve has been submitted to and approved in writing by the Local Planning Authority.

The detailed design scheme must include:

- Boundary details and means of enclosure;
- Details of minor artefacts and structures (e.g. furniture, bat boxes, seating, refuse or other storage units, signs, lighting etc.)
- Planting plans;
- New habitat to be created, in particular, detailed designs of any wetland features or ponds that will be created including cross sections;
- Infrastructure details such as footpaths, lighting, car parking; and

- Schedules or plants noting species, planting sizes and proposed numbers/densities.

The design scheme shall be prepared in the context and guidance provided by:

- Alderbourne Farm Landscape and Biodiversity Strategy document 10b
- Illustrative Masterplan 3939-FBA-02-00-DR-A-01 101 P01
- Pinewood South and Alderbourne Farm Biodiversity Net Gain dated July 2022
- Biodiversity and Green Infrastructure document 20b dated July 2022
- Development Framework & Design and Access Statement document 08 dated July 2022
- Pinewood South and Alderbourne Farm Arboricultural Report Document 11
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy dated September 2022
- 3939-FBA-01-00-DR-A-01\_001\_P01 - PP1 Site Context (current levels)
- 3939-FBA-01-00-DR-A-01\_002\_P01 - PP2 Site Context (proposed levels)
- 3939-FBA-01-00-DR-A-01\_003\_P01 - PP3 Development Zones
- 3939-FBA-01-00-DR-A-01\_004\_P01 - PP4 Land Use
- 3939-FBA-01-00-DR-A-01\_005\_P01 - PP5 Green Infrastructure
- 3939-FBA-01-00-DR-A-01\_006\_P01 - PP6 Access and Movement
- 3939-FBA-01-00-DR-A-01\_007\_P01 - PP7 Building Heights
- 3939-FBA-01-XX-SC-A-01\_008\_P01 – PP9 Proposed Demolitions
- 3939-FBA-01-XX-SC-A-01\_000\_P02 – PP8 Proposed Numbers and Yield

The nature reserve shall not be constructed otherwise than in accordance with the approved details and thereafter retained.

Reason: This is required to be pre-commencement as it comprises approval of details for construction/implementation. To ensure good design in-line with the provisions of Section 12 the Framework (2021), Saved Local Plan (1999) policies EP3 and EP4, CP8 of the Core Strategy (2011) and Policy IV2 of the Iver Neighbourhood Plan (2022).

#### **Pipeline Buffer**

4. No built form within any part of the development shall be constructed within 3 metres of the British Pipeline Agency pipeline shown on plan BPA Reference Number: 2022-4794.

Reason: To maintain the high-pressure petroleum pipeline system under the application site for safety and hazard prevention in accordance with Paragraph 183 of the Framework (2021) and Policy EP16 of the Local Plan (1999).

## **Watercourse Buffer**

5. No development shall commence until a scheme for the provision and management of an 8 metre wide buffer zone alongside the Alderbourne watercourse has been submitted to, and approved in writing by, the Local Planning Authority.

The scheme shall include:

- Plans showing the extent and layout of the buffer zone;
- Details of any proposed planting scheme/s (for example, native species suited to the conditions on site);
- Details, including cross sections and designs of the wetland features to be constructed;
- Details demonstrating how the buffer zone and features within them will be protected during development and managed over the longer term;
- A management plan outlining the future management and maintenance of the buffer zone;
- Details of location of any proposed footpaths, materials, fencing and lighting, which are in proximity of the footpaths to the water course;
- A programme for its implementation; and
- Details and designs of any proposed bridges.

The development shall be carried out and maintained in accordance with these approved details. No further landscaping or other works shall take place within the buffer zone of the watercourse.

Reason: This is required to be pre-commencement as it seeks to protect the land alongside the watercourse as it is particularly valuable for wildlife and construction or excavation works within buffer zones can impact on protected species and habitats; in accordance with Paragraph 174 of the Framework (2021) Policies CP9 and CP13 of the Core Strategy (2011).

## **Habitat Restoration Plan**

6. Prior to first use of the development hereby permitted a detailed habitat restoration and management plan for Blooms Wood Ancient Woodland including a programme for implementation shall have been submitted to and approved in writing by the Local Planning Authority. The restoration and management shall be carried out in accordance with the approved details.

Reason: To result in ecological improvement of the Ancient Woodland, as outlined in the ES in accordance with Paragraph 174 of the Framework (2021), and Saved Policy L10 of the Local Plan (1999).

## **Biodiversity Net Gain Plan**



7. Prior to the commencement of development hereby permitted a Biodiversity Gain Plan (BGP) shall be submitted to and approved in writing by the Local Planning Authority. The BNG plan shall include the following:

- a description and evaluation of the application site and its features as at the date of grant of planning permission (required base-line);
- a BNG calculation (including the related methodology) in respect of the development hereby permitted to achieve a net gain of at least 20 %, in combination with Parts B and C;
- a Biodiversity management plan which outlines measures to ensure the management and maintenance of the BNG for at least 30 years.

The development shall be carried out in accordance with the BGP. Thereafter it shall be managed and maintained in accordance with the approved details.

Reason: Required to be pre-commencement to ensure net-gain is delivered as part of the proposed development in accordance with Policies CP9 and CP13 of the Core Strategy.

#### **Landscape and Ecological Management Plan (LEMP)**

8. No development shall take place (including demolition, ground works, and vegetation clearance) until a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority. The content of the LEMP shall include the following:

- description and evaluation of features to be managed, including BNG, as outlined in conditions 3 and 7;
- ecological trends and constraints on site that might influence management;
- aims and objectives of management including the delivery of the required biodiversity net gain;
- appropriate management options for achieving aims and objectives;
- prescriptions for management actions;
- preparation of a work schedule and implementation programme (including an annual work plan capable of being rolled forward over a five-year period); and
- ongoing monitoring and remedial measures.

The development shall be carried out in accordance with these approved details and retained thereafter.

Reason: This is required to be pre-commencement to ensure appropriate protection and enhancement of biodiversity during construction of the proposed development and to provide a reliable process for implementation and aftercare; in accordance with Paragraph 174 of the Framework (2021) Policies CP9 and CP13 of the Core Strategy (2011).

## **Archaeology**

9. Where significant ground works are proposed, no development (including works of demolition) shall commence until a written scheme of archaeological evaluation has been submitted and approved in writing by the Local Planning Authority. This may take place over a number of phases and may lead to targeted excavation.

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

Reason: This is required to be pre-commencement as it seeks to secure appropriate investigation, recording, publication and archiving of archaeological results before development begins, in accordance with Framework Paragraphs 192, 194 and 205, Policy CP8 of the South Bucks Core Strategy (2011) and Saved Policy C15 of the Local Plan (1999).

## **Outline Permission**

**Conditions pertaining to Parts B and C of the development hereby permitted.**

### **Reserved Matters**

10. Approval of the following details (herein referred to as 'Reserved Matters':

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

Relating to each part of the proposed development shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of that Part. The development of that part 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 (as amended).

### **Implementation of Reserved Matters**

11. 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 development shall be begun before the expiry of 2 years from the date of approval of the last of the 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.

## **Timescales**

12. Application for approval of the last reserved matters 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.

### **Approved Plans**

13. The development shall be carried out in substantial accordance with the approved plans, listed below:

#### **Pinewood South:**

- Existing Site Plan 3939-FBA-01-00-DR-A-01\_110 P01
- 3939-FBA-01-00-DR-A-01\_001\_P01 - PP1 Site Context (current levels)
- 3939-FBA-01-00-DR-A-01\_002\_P01 - PP2 Site Context (proposed levels)
- 3939-FBA-02-00-DR-A-01\_003\_P01 - PP3 Development Zones
- 3939-FBA-01-00-DR-A-01\_004\_P01 - PP4 Land Use
- 3939-FBA-01-00-DR-A-01\_005\_P01 - PP5 Green Infrastructure
- 3939-FBA-01-00-DR-A-01\_006\_P01 - PP6 Access and Movement
- 3939-FBA-01-00-DR-A-01\_007\_P01 - PP7 Building Heights
- 3939-FBA-01-XX-SC-A-01\_000\_P01 - PP8 Development Numbers and Yield
- ITL17509-GA-001 Rev C Proposed Priority Junction Arrangement from Pinewood Road- Southern Access
- ITL17509-GA-002 Rev B Proposed Priority Junction Arrangement from Pinewood Road- Northern Access
- ITL16184-GA-002 Rev D Proposed Left in/ Left out Arrangement from A412 Uxbridge Road
- ITL17509-GA-011 Proposed Gravel Path Along Pinewood Road
- ITL17509-GA-012 Proposed Gravel Path Along Pinewood Road
- ITL16184-GA-015 Proposed Amendments to Existing Lay-bys
- Illustrative Masterplan 3939-FBA-02-00-DR-A-01 101 P01

#### **Alderbourne Farm:**

- Existing Site Plan 3939-FBA-02-00-DR-A-01\_110 P01
- 3939-FBA-01-00-DR-A-01\_001\_P01 - PP1 Site Context (current levels)
- 3939-FBA-01-00-DR-A-01\_002\_P01 - PP2 Site Context (proposed levels)
- 3939-FBA-01-00-DR-A-01\_003\_P01 - PP3 Development Zones
- 3939-FBA-01-00-DR-A-01\_004\_P01 - PP4 Land Use
- 3939-FBA-01-00-DR-A-01\_005\_P01 - PP5 Green Infrastructure

- 3939-FBA-01-00-DR-A-01\_006\_P01 - PP6 Access and Movement
- 3939-FBA-01-00-DR-A-01\_007\_P01 - PP7 Building Heights
- 3939-FBA-01-XX-SC-A-01\_008\_P01 – PP9 Proposed Demolitions
- 3939-FBA-01-XX-SC-A-01\_000\_P02 – PP8 Proposed Numbers and Yield
- Illustrative Masterplan 3939-FBA-02-00-DR-A-01 101 P01
- ITL17509-GA-010 Rev B Proposed Access and Pedestrian Crossing

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

#### **Approved plans and documents**

14. The details of the reserved matters submitted pursuant to this permission shall be in substantial accordance with the approved plans and documents listed below:

- Development Framework & Design and Access Statement document 08 dated July 2022
- ITL170509-004E R Framework Travel Plan [2nd ISSUE] dated 13<sup>th</sup> December 2022
- Pinewood South and Alderbourne Farm Biodiversity Net Gain Document 20A dated July 2022
- Biodiversity and Green Infrastructure document 20B dated July 2022
- Pinewood South and Alderbourne Farm Arboricultural Report Document 11
- Energy Statement dating July 2022 Document 18
- Sustainability Statement Document 16
- Economic and Social Benefits Assessment Document 13
- Transportation Assessment and Framework Travel Plan Document 09
- Pinewood South Flood Risk Assessment and Drainage Strategy dated September 2022
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy dated September 2022
- Landscape and Biodiversity Strategy Document 10B
- Landscape and Biodiversity Strategy Document 10A

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.

#### **Orderly development**

15. Each reserved matters application shall be accompanied by an updated illustrative masterplan and programme for delivery, which provides an up to date context for

the development as a whole including how it fits with subsequent parts of the development to come forward as Reserved Matter Applications.

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

## **Design and Appearance**

### **Levels**

16. Each Reserved Matters application for approval of appearance for that relevant part of the development shall include 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 part of the development.

Reason: To accord with the National Planning Policy Framework and to ensure the satisfactory design of the development, in accordance with Policy CP8 of the Core Strategy, Saved Local Plan Policies EP3 and EP4 and Policy IV2 of the Iver Neighbourhood Plan

### **Materials**

17. Each Reserved Matters application for approval of appearance for that relevant part of the development shall include details of materials proposed for all of the external faces of the building(s) within that part, including walling, fenestration and roofing. Sample panels shall be made available at the request of the LPA on the application site.

Reason: To accord with the National Planning Policy Framework and to ensure the satisfactory design of the development, in accordance with Policy CP8 of the Core Strategy, Saved Local Plan Policies EP3 and EP4 and Policy IV2 of the Iver Neighbourhood Plan

### **Phased Biodiversity Net Gain Plan**

18. Each Reserved Matters application for approval of landscaping for that relevant part of the development shall include a Biodiversity Net Gains Plan demonstrating that Biodiversity Net Gain will be achieved. The Biodiversity Net Gain Plan shall include the following details:

- Information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- a description and evaluation of the application site and its features as at the date of grant of planning permission (required base-line);
- a BNG calculation (including the related methodology) in respect of the development hereby permitted to achieve a least 10%;
- a Biodiversity management plan which outlines measures to ensure the management and maintenance of the BNG for at least 30 years.

Reason: To accord with the National Planning Policy Framework and to ensure net-gain is delivered as part of the proposed development in accordance with Policies CP9 and CP13 of the Core Strategy.

### **Landscape and Ecology Design**

19. Each Reserved Matters application for the approval of landscaping for that part of the development shall include details of both hard and soft landscaping works, ecology works and an implementation programme.

The details shall include (but not be limited to the following):

- boundary details and means of enclosure;
- noise barriers (a fence and/or earth bund) as may be required;
- hard surfacing areas (e.g. surfacing materials) and their permeable qualities;
- planting plans including details of schedules or plants noting species, planting sizes and proposed numbers/densities;
- ecological assets/features to be retained and enhanced;
- new habitat to be created, in particular, detailed designs of any wetland features or ponds that will be created;
- treatment of site boundaries;
- infrastructure such as footpaths, lighting, car parking; and
- written specifications (including soil depths, cultivation and other operations associated with plant and grass establishment).

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 and therefore retained.

Reason: To ensure satisfactory landscaping of the site in the interests of visual amenity in accordance with Saved Policies EP3 and EP4 of the Local Plan (1999).

### **Landscape and Ecological Management Plan (LEMP)**

20. No development shall take place (including demolition, ground works, and vegetation clearance) until a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority. The content of the LEMP shall include the following:

- description and evaluation of features to be managed, including BNG, outlined in conditions 18 and 19;
- ecological trends and constraints on site that might influence management;
- aims and objectives of management including the delivery of the required biodiversity net gain;
- appropriate management options for achieving aims and objectives;
- prescriptions for management actions;

- preparation of a work schedule and implementation programme (including an annual work plan capable of being rolled forward over a five-year period); and
- ongoing monitoring and remedial measures.

The development shall be carried out in accordance with these approved details and retained thereafter.

Reason: This is required to be pre-commencement to ensure appropriate protection and enhancement of biodiversity during construction of the proposed development and to provide a reliable process for implementation and aftercare; in accordance with Paragraph 174 of the Framework (2021) Policies CP9 and CP13 of the Core Strategy (2011).

### **Landscape Replacement**

21. Any planting 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 in accordance with Saved Policies EP3 and EP4 of the Local Plan (1999).

### **Arboricultural documents**

22. No development (including for the avoidance of doubt any works of demolition) shall commence on Part B or Part C until a tree protection plan and method statement (in accordance with British Standard 5837:2012 'Trees in relation to design, demolition and construction' (or any replacement thereof or EU equivalent)) has been submitted to and approved in writing by the Local Planning Authority.

The method statement shall provide, as required, details of:

- Areas of no dig;
- Phasing of demolition and construction operations;
- Siting of work huts and contractor parking;
- Areas for the storage of materials and the siting of skips and working spaces; and
- Areas for the erection of scaffolding;

Protective fencing detailed in the method statement shall consist of a vertical and horizontal scaffold framework, braced to resist impacts, with vertical tubes spaced at a maximum level of 3m. On to this, weldmesh panels shall be securely fixed with wire scaffold clamps. The fencing shall be erected to protect existing trees and other vegetation during construction and shall conform to British Standard 5837:2012 'Trees in Relation to Construction' or any replacement thereof or EU equivalent. The approved fencing shall be erected prior to the commencement of any works or development on the site including any works of demolition. The approved fencing shall be retained and maintained until all building, engineering or other operations

have been completed. No work shall be carried out or materials stored within the fenced area without prior written agreement from the Local Planning Authority.

Reason: This condition needs to be pre-commencement as it requires measure to ensure that the crowns, boles and root systems of the shrubs, trees and hedgerows are not damaged during the period of construction and in the long term interests of local amenities; in accordance with Saved Policies EP4 and L10 of the South Bucks District Local Plan (1999).

## **Environmental Protection**

### **Pipeline Buffer**

23. No built form within any part of the development hereby permitted shall be constructed within 3 metres of the BPA pipeline which runs through the site as shown on plans ref. BPA Reference Number: 2022-4794 and BPA Reference Number: 2021:3477.

Reason: To maintain the high-pressure petroleum pipeline system under the application site for safety and hazard prevention in accordance with

### **Backlots**

24. No use (for any film or television related activities) shall commence on any backlot within Part B or Part C the development hereby permitted, until a Backlot Management Plan has been submitted to and approved in writing by the Local Planning Authority. The backlots shall thereafter be managed in accordance with the approved Backlot Management Plan. The plan shall include, but not be limited to, the following details:
- hours of operation;
  - details of any external lighting; and
  - details of any noise generating plant, machinery, equipment
  - measures for managing noise associated with filming and pyrotechnics with the potential to impact on surrounding amenity

Reason: This is required to be pre-commencement as it controls the temporary use of Backlot lands prior to the construction of any set(s) in order to prevent negative impacts upon ecology and to ensure that the amenity of occupiers of the surrounding premises are not adversely affected by noise from plant/mechanical installations/ equipment; in accordance with the Framework, Policy 13 of the Core Strategy (2011) and Saved Policies EP3 and EP5 of the Local Plan (1999).

### **Noise and Vibration**

25. Prior to first use of any building or the backlot land on any part of parts B or C of the development hereby permitted, details of the external sound level emitted from plant, machinery equipment (including powered mobile mechanical plant, including materials handling and lifting equipment), and any mitigation measures in respect of that building or backlot land, shall have been submitted to and approved in writing by the Council.



Approved mitigation shall be put in place prior to use of that buildings or the backlot land and thereafter be permanently retained. The impact assessment shall be made of sound levels at the nearest and or most affected noise sensitive receptors with all machinery running concurrently at operational capacity. The Specific Sound Level emitted from fixed plant, machinery and equipment shall be at least 5dB below the typical Background Sound Level (as per BS4142:2014 + A1:2019).

Reason: To ensure that the amenity of occupiers of the surrounding premises are not adversely affected by noise or vibration from plant/mechanical installations/ equipment; in accordance with the Framework, Policy 13 of the Core Strategy (2011) and Saved Policies EP3 and EP5 of the Local Plan (1999).

### **Foul Water Drainage Scheme**

26. Prior to first use of the development hereby permitted a foul water drainage scheme with details of a programme for any proposed connection into the public sewage network, shall 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 scheme.

Reason: In order to avoid flooding and/or potential pollution incidents in accordance with the Paragraph 170 of the Framework (2021) and Policies CP9 and CP13 of the Core Strategy (2011).

### **No Infiltration drainage**

27. No drainage systems for the infiltration of surface water to the ground are permitted within Parts B or C of the development hereby permitted.

Reasons: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. In accordance with Paragraph 170 of the Framework (2021) and Policy CP13 of the Core Strategy (2011).

### **SuDs Maintenance**

28. Prior to the commencement of any part of the development hereby permitted 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 (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 and Policy CP13 of the Core Strategy (2011).

### **Construction Environmental Management Plan (CEMP)**

29. No development (including demolition, ground works, vegetation clearance) of any part of the development hereby permitted shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority for that part of the site. The CEMP shall include the following details of:
- no materials, machinery or work encroaching onto Black Park Site of Special Scientific Interest or Blooms Wood at any time;
  - risk assessment of potentially damaging construction activities;
  - identification of “biodiversity protection zones”, including specific reference to badger, great crested newt, breeding birds and ancient woodland;
  - 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;
  - the location and timing of sensitive works to avoid harm to biodiversity features;
  - descriptions and mapping of all exclusion zones (both vehicular and for storage of materials) to be enforced during construction to avoid any unnecessary soil compaction on area to be utilised for habitat creation;
  - contingency/emergency measures for accidents and unexpected events, along with remedial measures;
  - 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;
  - responsible persons for managing and monitoring the works and lines of communication;
  - 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;
  - measures for removal of any invasive species within the site;
  - proposed mitigation measures to deal with any dust, vibration, noise and general disturbance (including to residential amenity) and measures to monitor the same;
  - use of protective fences, exclusion barriers and warning signs;
  - measures to ensure works to habitats that support nesting birds are undertaken outside of nesting season (March – September inclusive)
  - how certain activities will be limited in time, location or noise level to minimise the risk of disturbance to ground nesting birds;

- 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));
- measures for on-going monitoring and assessment during construction to ensure environmental objectives are achieved;
- species composition and abundance where planting is to occur;
- proposed management prescriptions for all habitats for a period of no less than 30 years; and
- measures for the removal of in-situ treatment of fly tipped materials within Blooms Wood.

The construction of the development of that relevant part shall be carried out in accordance with these approved details and managed thereafter in accordance with the CEMP.

Reason: this condition is required to be pre-commencement in the interests of improving biodiversity and to ensure the survival of protected and notable species during construction of the proposed development in accordance with Section 15 of the Framework and Policies CP9 and CP13 of the Core Strategy.

### **Lighting Strategy**

30. Prior to first use of any part of the development hereby permitted a lighting strategy for that part of the development shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall:
- outline maximum luminance;
  - detail location, height, type and direction of light sources and intensity of illumination;
  - details of the lights to be switched off/ and or dimmed at night including times;
  - identify those areas/features on site that are particularly sensitive for 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;
  - show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) 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.
  - assess the impact of external lighting from the existing baseline of the existing Pinewood development on the woodland edge of Black Park, Blooms Wood and the existing Peace Path route within the application site;
  - identify recommendations for actions to reduce the lighting impact of the proposed development on the Black Park and Blooms Wood woodland edges

and the existing Peace Path route within the application site (having regard to the impacts identified at (a) above); and

- include a programme for completion of the actions identified at (d) above.

The development shall be carried out in accordance with these approved details and retained thereafter. No other lighting should take place on site without the prior permission of the Local Planning Authority.

Reason: To ensure that the cumulative effect of the lighting of the proposed development mitigates adverse impacts on the protected species; in accordance with Section 15 of the Framework and Policies CP9 and CP13 of the Core Strategy.

### **Bat Mitigation Method Statement**

31. No development (including for the avoidance of doubt any works of demolition) shall commence on any part of the development hereby permitted until a bat mitigation method statement in respect of that part has been submitted and approved in writing by the Local Planning Authority.

This method statement shall include details of bat building provision of alternative roosts comprising of a bat barn and bat box scheme and details of enhancement of overall roosting to be provided in Part A of the development hereby permitted.

The development shall be carried out in accordance with the approved statement and thereafter any mitigation measures shall thereafter be retained.

Reason: This is required to be pre-commencement as it seeks to establish new habitat for bats before existing habitat is removed/destroyed. In accordance with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) and to protect species of conservation concern in accordance with Section 15 of the Framework (2021) and Policies CP9 and CP13 of the Core Strategy (2011)

### **Contamination Preliminary risk assessment**

32. No development (including for the avoidance of doubt any works of demolition) shall commence on part A or B of the development hereby permitted until a preliminary risk assessment which identifies all previous uses, potential contaminants associated with those uses, a conceptual model of that part of the site indicating sources, pathways and receptors and potentially unacceptable risks arising from contamination of that part of the site has been submitted to and approved in writing by the Local Planning Authority

Reason: This conditions is required to be pre-commencement to ensure that risks from potential 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; in accordance with Policy CP13 of the Core Strategy (2011)

### **Contamination Scheme of Investigation**

33. If the assessment at Condition 29 shows a material risk, an investigation scheme to provide information for a detailed assessment of the risk to all receptors that may be

affected, including those off site shall be submitted to and approved in writing by the Local Planning Authority.

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.

Reason: To ensure that risks from potential 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; in accordance with Policy CP13 of the Core Strategy (2011)

### **Contamination Options Appraisal and Remediation Plan**

34. If the investigation carried out under Condition 30 shows a material risk, an options appraisal and remediation plan giving full details of the remediation measures required and how they are to be undertaken shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that risks from potential 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; in accordance with Policy CP13 of the Core Strategy (2011)

### **Contamination Verification Plan**

35. If a remediation scheme is required under Condition 31 a verification plan providing details of the data that will be collected in order to demonstrate that the works set out in Condition 31 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 potential 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; in accordance with Policy CP13 of the Core Strategy (2011)

### **Verification Report**

36. Prior to first use of the any part of the development hereby permitted a verification report that demonstrates the effectiveness of the remediation carried out in respect of that part pursuant to condition 32 shall be prepared together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils and submitted to the Local Planning Authority for approval in writing. The monitoring and maintenance programme shall be implemented in accordance with these details.

The verification report shall be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>.

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; in accordance with Policy CP13 of the Core Strategy (2011)

### **Unexpected Contamination**

37. 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 in accordance with the requirements of condition 29 and 30 above and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 31 and 32, 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; in accordance with Policy CP13 of the Core Strategy (2011)

### **Highways**

#### **Travel Plans**

38. No part of the development hereby approved shall be brought into first use until a detailed travel plan (including a programme for its implementation) for the relevant part of the development has been submitted to and approved in writing by the Local Planning Authority. Each travel plan shall be in substantial accordance with the Framework Travel Plan document dated 13 December 2022 and each approved travel plan shall subsequently be implemented.

Reason: To ensure that provision is made for sustainable travel as characterised within the Transport Assessment and Framework Travel Plan in accordance with Paragraph 111 and 112 of the Framework (2021), Policy CP7 of the Core Strategy (2011), Saved Policy TR5 of the Local Plan (1999) and Policy IV8 of the Iver Neighbourhood Plan (2022).

#### **Reserved Matters Highway Details**

39. Each Reserved Matters application for approval of layout for that relevant part of the development shall include the following details:
- the number and location of car parking spaces to be provided ;
  - electric vehicle charging provision at a rate of 5% of the parking spaces to be active provision and 5% to be built as infrastructure ready passive provision;

- disabled parking provision to be provided;
- a scheme for the off street parking of cars, coaches and buses to include details of manoeuvring, loading and unloading areas;
- a scheme for the off street manoeuvring, loading and unloading of vehicles;
- an internal movement plan in respect of pedestrians, cycles, cars, coaches and buses;
- details of the locations of primary security gates provision and any vehicular barriers;
- the provision, location and layout of appropriately covered and lit cycle parking;
- e-bike charging provision, cycle storage lockers and racks;
- changing facilities and lockers for the storage of personal effects;
- details of routes to be maintained at all times for emergency vehicle access and servicing of the relevant part of the development; and
- details of routes to be maintained at all times to ensure safe pedestrian access throughout the relevant part of the development separated from vehicular movements and servicing activities.

The approved details shall be completed and made available prior to the first use of the relevant part of the development hereby permitted and the areas retained thereafter.

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; to 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 in accordance with Policy CP7 of the Core Strategy (2011), Saved Policy TR5 of the Local Plan (1999) and Policy IV8 of the Iver Neighbourhood Plan (2022).

#### **Five Points Roundabout**

40. No part of the development shall be first used until the Five Points Roundabout improvement works permitted under application reference PL/21/4074/FA (or any variation of it) have been completed and are open to traffic.

Reason: In the interests of highway safety and to ensure safe and suitable access to the development in accordance with Paragraphs 111 and 112 of the Framework (2021), Policy CP7 of the Core Strategy (2011), Saved Policy TR5 of the Local Plan (1999) and Policy IV8 of the Iver Neighbourhood Plan (2022).

#### **Seven Hills Road**

- 41.
- No part of the development shall commence until a Seven Hills Road Improvement Scheme trigger point Transport Assessment has been submitted to and approved in writing by the Local Planning Authority. This transport

assessment shall identify the quantum of floorspace at which the Seven Hills Road improvement scheme shall be completed and open to traffic. The Seven Hills Road scheme is as approved under application reference PL/19/4430/FA or any subsequent permission.

- ii. No quantum of floor space greater than the trigger point identified under (i) above shall be used until such time as the Sevenhills Road Improvement Scheme is completed and open to traffic

Reason: In the interest of highway safety and capacity and to ensure safe and suitable access that would not generate severe adverse traffic impacts at any of the following locations:

- (1) Pinewood Road / Pinewood East access (roundabout);
- (2) Pinewood Road / Pinewood West access (roundabout);
- (3) Pinewood Road / Sevenhills Road (priority junction);
- (4) A412 Denham Road / Sevenhills Road (priority junction);
- (5) Pinewood Road / Pinewood Green (priority junction);
- (6) Five Points Roundabout (FPR);
- (7) A412 Church Road / Thornbridge Road (mini-roundabout);
- (8) A412 Church Road / Bangors Road North / A412 Denham Road (mini-roundabout);
- (9) Pinewood Road site accesses (priority junctions); and
- (10) Development traffic on Pinewood Green.

In compliance with Paragraphs 111 and 112 of the Framework (2021), Policy CP7 of the Core Strategy (2011), Saved Policy TR5 of the Local Plan (1999) and Policy IV8 of the Iver Neighbourhood Plan (2022).

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

42. No development shall commence (including any works of demolition and ground works) on each relevant part of the development hereby permitted until a Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority in respect of that relevant part of the site. The CTMP shall include details of the following matters in relation to the construction for that relevant part:
  - text, maps, and drawings as appropriate of the scale, timing and mitigation of all construction related aspects of the development;
  - construction details of all new site access points;
  - routing and types of vehicles;
  - measures to limit delivery journeys on the Strategic and Local Road Network during highway peak hours;



- traffic movements (including an estimate of daily construction movements and a cumulative estimate of other approved CTMPs in respect of each individual part 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;
- site hours of operation;
- construction compounds and storage and dispensing of fuels, chemicals, oils and any hazardous materials (including hazardous soils);
- location of 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;
- location and specification of temporary lighting;
- risk management and emergency procedures;
- location, design, material and scale of hoarding; and
- a condition survey of Pinewood Road prior to any ground works and demolition.

The construction of that part of the development permitted shall be carried out in accordance with the approved CTMP.

Reason: To ensure the traffic and movement impacts of construction are managed and monitored to maintain safe operation of the highway and a worst case scenario of the entire development proposal being built out at the same time is assessed; in accordance with Paragraphs 111 and 112 of the Framework (2021), Policy CP7 of the Core Strategy (2011), Saved Policy TR5 of the Local Plan (1999). and Policy IV8 of the Iver Neighbourhood Plan (2022)

## **Climate Change**

### **Renewable energy**

43. Each Reserved Matters application for approval of appearance for that part of the development shall include an Energy Statement.

The statement shall include full details of the decentralised, renewable or low-carbon technologies that are to be integrated into the development and shall demonstrate how they will meet at least 10% of the energy demand on site. It shall include details of:

- The baseline CO2 emissions;
- The reduction in CO2 emissions achieved from low carbon or renewable sources; and

- U-values, thermal bridging, g-values and air tightness specifications of the development.

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

Reason: To ensure the development is sustainable and to comply with the requirements of CP12 (Sustainable Energy) of South Bucks Core Strategy (2011).

#### **Measures to minimise water usage**

44. Each Reserved Matters application for approval of appearance for that part of the development shall include a report outlining measures to reduce water usage levels within the proposed buildings in that part and detailed measures for how this is to be achieved.

The development shall be carried out in accordance with these approved details and retained thereafter.

Reason: To ensure the development is sustainable and to comply with policy CP13 of Core Strategy (Sustainable Energy) of South Bucks Core Strategy (2011).

#### **Whole life carbon assessment**

45. With each reserved matters application a Whole Life-Cycle Carbon Assessment shall be provided to the Local Planning Authority that shall demonstrate:

- The embodied carbon footprint of that part of the proposed development together with measures to reduce these where practical, feasible and viable; and
- The operational carbon footprint of that part of the development over a 30-year period and the measures taken to reduce carbon emissions

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

Reason: To ensure sustainable construction and operation of the proposed development in line with the Climate Change objectives as set out in the submitted ES and in Policies CP8, CP12 and CP13 of the Core Strategy (2011) and IV15 of the Iver Neighbourhood Plan (2022).

#### **Site Waste Management Plan**

46. Prior to construction of the relevant part of the site, a Site Waste Management Plan in respect of that part shall be submitted to and approved in writing by the Local Planning Authority. This shall include principles for handling, disposing of and managing waste during construction, and confirming targets for the reuse and recycling of waste and diversion of waste from landfill for that part of the development.

Construction shall be carried out in accordance with the approved details.

Reason: To ensure sustainable construction of the proposed development in line Policies CP8, CP12 and CP13 of the Core Strategy (2011) and IV15 of the Iver Neighbourhood Plan (2022).

### **Conditions relating to Part B**

#### **Maximum Floorspace**

47. For Part B of the development here by permitted no more than the maximum floor space set out in Parameter Plan, 3939-FBA-01-XX-SC-A-01\_000\_P02- PP8 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.

#### **Restriction of development at Alderbourne Farm**

48. Prior to first use of the Part B development hereby permitted the Seven Hills Road improvement scheme shall have been completed and opened to traffic in accordance with planning permission PL/19/4430/FA (or any subsequent permission).

Reason: In accordance with the baseline environmental impact and in the interest of highway safety and capacity and to ensure safe and suitable access to the development; in accordance with Policy CP7 of the Core Strategy (2011), Saved Policy TR5 of the Local Plan (1999) and Policy IV8 of the Iver Neighbourhood Plan (2022).

#### **Mineral Recovery Plan**

49. Prior to the commencement of Part B of the development hereby permitted, a Mineral Recovery Plan shall be prepared which will assess the areas of construction where minerals would be potentially recoverable, such as groundworks, SUDS and landscaping areas. The Mineral Recovery Plan should consider the extent to which any minerals available on site would meet the specifications required for construction of the development and record the tonnages of recovered usable minerals where possible. The Mineral Recovery Plan shall be submitted to, approved by the Local Planning Authority and adhered to for the duration of construction works on site.

Reason: This condition is required to be pre-commencement to ensure any useable mineral resource on site is recovered and used in construction of the proposed development; in accordance with Policy 1 of the Minerals and Waste Local Plan 2019.

#### **Archaeology**

50. No development on Part B hereby permitted (including for the avoidance of doubt any works of demolition) shall take place until a written scheme of archaeological evaluation in respect of that part, has been submitted and approved in writing by the Local Planning Authority. This scheme shall be in the form of a geophysical survey which will be ground truthed through trial trenching. The archaeological investigations should be undertaken by a professionally qualified archaeologist. The development shall be carried out in accordance with the approved scheme.

Reason: This is required to be pre-commencement as it seeks secure appropriate investigation, recording, publication and archiving of archaeological results before development begins, in accordance with Framework Paragraphs 192, 194 and 205, Policy CP8 of the South Bucks Core Strategy (2011) and Saved Policy C15 of the Local Plan (1999). Reason: To secure appropriate investigation, recording, publication and archiving of the results in conformity with Framework Paragraph 205 and CP8 of the South Bucks Core Strategy (2011).

### **Drainage Details**

51. No development shall commence on any part of Part B of the development hereby permitted until a surface water drainage scheme for that part of development, based on Alderbourne Farm Flood Risk Assessment and Drainage Strategy (Rev 04 December 2022, Civic Engineers), has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:
- assessment of SuDS components as listed in the CIRIA SuDS Manual (C753) and provide justification for exclusion if necessary;
  - 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;
  - confirmation that the discharge rate should be limited to 8.73l/s;
  - ground investigations including:
    - Infiltration in accordance with BRE365
    - Groundwater level monitoring over the winter period
  - proposed ground conditions permit, surface water drainage should be managed by infiltration-based SuDS;
  - confirmation that, where required, floatation calculations based on groundwater levels encountered during winter monitoring (November-March);
  - SuDS components as set out in the FRA (5.4.11) and Drawing nos. 1278-03-CIV-XX-XX-D-C-30001;
  - full construction details of all SuDS and drainage components;
  - 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; and

- 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.

The surface water drainage scheme shall subsequently be implemented in accordance with the approved details before the development is brought into first use and thereafter retained.

Reason: The reason for this pre-commencement condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 167 and 169 of the Framework (2021) to ensure that there is a satisfactory solution to managing flood risk in accordance with Policy CP13 of the Core Strategy (2011)

### **EPS licence Bats**

52. No development shall commence on Part B until either of the following have been submitted to and approved in writing by the Local Planning Authority:
- a) a licence issued by Natural England pursuant to Regulation 53 of The Conservation of Habitat and Species Regulations 2017 (as amended) authorising the specified activity/development to go ahead in relation to impact on bats and bat roosts; or
  - b) a statement in writing from a suitably qualified ecologist to the effect that they do not consider that the specified activity/development will require a licence in relation to impact on bats and their roosts.

Reason: This condition is required to be pre-commencement in order to comply with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) and to protect species of conservation importance; in accordance with Section 15 of the Framework and Policies CP9 and CP13 of the Core Strategy.

### **Conditions relating to Part C**

#### **Maximum Floorspace**

53. For Part C of the development here by permitted no more than the maximum floor space set out in Parameter Plan PP8 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.

#### **Archaeology**

#### **Trial Trenching**

54. No development on Part C hereby permitted (including for the avoidance of doubt any works of demolition) shall take place within the development hereby permitted until a written scheme of archaeological evaluation in respect of that part, has been submitted and approved in writing by the Local Planning Authority. This scheme shall include watching provisions and trial trenching on areas of previously undisturbed ground which will be impacted by development proposals. The archaeological investigation should be undertaken by a professionally qualified archaeologist.

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

Reason: This is required to be pre-commencement as it seeks secure appropriate investigation, recording, publication and archiving of archaeological results before development begins, in accordance with Framework Paragraphs 192, 194 and 205, Policy CP8 of the South Bucks Core Strategy (2011) and Saved Policy C15 of the Local Plan (1999).

### **Drainage Details Part C**

55. No development shall commence on any part of Part C of the development hereby permitted until a surface water drainage scheme for that part of the development, based on Pinewood South Flood Risk Assessment and Drainage Strategy (Rev 04 December 2022, Civic Engineers), has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:
- assessment of SuDS components as listed in the CIRIA SuDS Manual (C753) and provide justification for exclusion if necessary;
  - 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;
  - confirmation that the discharge rate should be limited to 1.7l/s/ha;
  - proposed ground investigations including:
    - Infiltration in accordance with BRE365
    - Groundwater level monitoring over the winter period
  - confirmation that where ground conditions permit, surface water drainage should be managed by infiltration-based SuDS;
  - where required, floatation calculations based on groundwater levels encountered during winter monitoring (November-March);
  - SuDS components as set out in the FRA (5.4.11) and Drawing 1278-01-CIV-DR-30001-P02 30001;
  - full construction details of all SuDS and drainage components;
  - 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; and

- 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.

The surface water drainage scheme shall subsequently be implemented in accordance with the approved details before the development is brought into first use and thereafter retained.

Reason: The reason for this pre-commencement condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 167 and 169 of the Framework (2021) National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk in accordance with Policy CP13 of the Core Strategy (2011).

### **Foundation Works Risk Assessment**

56. No development on any part of Part C of the development hereby permitted shall commence until a foundation works risk assessment for that relevant part of the site has been submitted and approved in writing by Local Planning Authority.

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

Reason: The site is located on top of a landfill protected with a geological barrier. This barrier must be protected to ensure there is no harm to groundwater resources in line with Paragraph 183 of the Framework (2021) and Policy CP13 of the Core Strategy (2011).

### **Site access**

57. The construction of the A412 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.

The approved scheme shall be implemented prior to first use of the A412 access.

Reason: To ensure the existing layby provision is replaced and provides suitable provision for highway users; in accordance with Policy CP7 of the Core Strategy (2011), Saved Policy TR5 of the Local Plan (1999) and Policy IV8 of the Iver Neighbourhood Plan (2022).

### **Informatives**

#### **1. Connection to Ordinary Watercourse**

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

## **2. Works on Main Rivers**

Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, this development will require an Environmental Permit from the Environment Agency for connections to a main river. The applicant is advised to contact the Environment Agency for further information.

## **3. Section 278 Agreement**

The applicant is advised that prior to any works to the public highway 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  
6th Floor, Walton Street Offices  
Walton Street,  
Aylesbury  
Buckinghamshire  
HP20 1UY

[highwaysdm@buckinghamshire.gov.uk](mailto:highwaysdm@buckinghamshire.gov.uk)

## **4. Signage Strategy**

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.

## **5. Requirement for an environmental permit**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence



- (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure
- (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Please note for works impacting the river Alderbourne any permit will require a protected species survey. Of particular relevance in this case is water vole, which may be present at this location. Any works impacting natural bank within 5m of top of bank could impact water vole and their habitat.

Although this application will most likely not qualify for a FRAP the Environment Agency would like to be notified of the commencement of work and the duration of works as there is annual essential maintenance which will need to be undertaken and appropriate access will be needed.

## **6. Asset liability**

The Environment Agency would like to remind the applicant that, in the absence of an alternative agreement or special transference of liability or contract, the owner of the asset remains responsible for the asset. The risk remains with the asset owner and this response does not remove any of this liability from the owner or contractually responsible party.

## **7. Riparian responsibilities**

As Alderbourne runs within the red line boundary, it is likely that you own a stretch of watercourse. This means you have riparian responsibilities. Responsibilities include (but are not limited to) the maintenance of the river at this location including the riverbank.

Further information on this can be found here:  
<https://www.gov.uk/guidance/owning-a-watercourse>

## **8. Water Resources**

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.

#### **9. Protection of great crested newts and their breeding/resting places**

The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: deliberately capture, disturb, injure or kill great crested newts; damage or destroy a breeding or resting place; deliberately obstructing access to a resting or sheltering place. Planning consent for a development does not provide a defence against prosecution under these acts. Ponds, other water bodies and vegetation, such as grassland, scrub and woodland, and also brownfield sites, may support great crested newts. Where proposed activities might result in one or more of the above offences, it is possible to apply for a derogation licence from Natural England or opt into Buckinghamshire Council's District Licence. If a great crested newt is encountered during works, all works must cease until advice has been sought from Natural England, as failure to do so could result in prosecutable offences being committed.

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

#### **APPENDIX B: Site Location Plan**

#### **APPENDIX C: Parameter Plans**

#### **APPENDIX D: Illustrative Masterplans**

#### **APPENDIX E: Schedule of mitigation**

Do not scale – this map is indicative only

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## APPENDIX A: Consultation Responses and Representations

### Consultee Consultation Responses

#### Archaeology – 26 August 2022

Thank you for 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.

Our response will take Part A and Part B separately.

**Part A - Full application for the change in use of 25.6 ha of land at Alderbourne Farm to form a nature reserve with footpaths, biodiversity enhancements, associated parking and infrastructure. Outline application with all matters reserved (except for principal points of access) for land at Alderbourne Farm for backlots and up to 35,000 sqft (3,252 sqm) of associated film production buildings (workshops) together with access roads and parking.**

#### 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
0991700000	HER	Area 1, Project Pinewood Site: Possible settlement enclosures, pits and field boundary ditches found by geophysical survey.
0549000000	HER	MWY 116: Scatter of prehistoric and medieval artefacts found in advance of M25 construction
0548300000	HER	MWY: Late prehistoric sites found in advance of M25 construction
0436200000	HER	VIATORES ROAD 163B: Suggested route of a Roman road from Chorleywood to Langley Park.

\* COA = conservation area; LB = listed building; RPG = registered historic park; SAM = scheduled monument; PLN = planning notification area (undesigned 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

Relatively little archaeological investigation has been undertaken in the vicinity of the Part A area. Ground works for development and landscaping may impact buried archaeological remains. 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:

**Part A**

**No development shall take place, unless authorised by the Planning Authority, until the applicant, or their agents or successors in title, have secured the implementation of a programme of archaeological evaluation in the form of a geophysical survey which will be ground truthed through trial trenching in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. This evaluation should inform the relevant masterplans and may lead to further archaeological works. The development shall only be implemented in accordance with the approved scheme.**

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

**Part B - Outline application for Pinewood South on 32.6 ha of land with all matters reserved (except for three principal points of access) for up to 1,365,000sqft (126,817sqm) of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure.**

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 (undesigned 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 for application PL/20/3280/OA 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:

#### **Part B**

**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.

### **Archaeology – 9 January 2023**

#### **Additional and amended information submitted and changes to the description of the proposed development**

Thank you for 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. We have nothing to add to our previous letter dated the 26th August 2022.

If you have any queries regarding this advice, please do not hesitate to contact me.

### **British Pipeline Agency – 15 August 2022**

Thank you for the consultation regarding the above planning application.

The proposed works are in close proximity to a high-pressure petroleum pipeline system 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 two GIS maps of our pipelines in relation to the above application. Please note that these only show the indicative location of our assets, and exact locations can only be determined on site. There is also a CP groundbed and related cabling located at Alderbourne Farm which must be protected in addition to the pipelines.

The two sites are already within our system under separate job numbers, hence the two separate numbers referenced above.

Both of these sites affect our pipelines and infrastructure, and the applicant is aware of our pipeline network, and the plans do appear to take this into consideration. However to reiterate - no buildings or structures (temporary or permanent) can be located within the easement (3m each side of each pipeline). No ground level changes can be made without prior discussion with us. Any hard standing and road/track crossings over the pipelines will need the pipeline to be excavated, inspected, rewrapped and slabbed at the developer's cost under BPA supervision.

The most important points are:

- These Pipelines carry refined petroleum at extremely high pressure.
- Any construction must be kept a minimum of 3m from the pipelines.
- All excavations (including hand trial holes) within 3m 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.**

#### **British Pipeline Agency – 22 December 2022**

No further comments are necessary beyond what has already been advised relating to the initial consultation (attached)

BPA is in communication with the developer regarding these two sites, who are aware of the restrictions imposed by the pipeline leases already in place.

#### **Climate Change – 5 January 2023**

##### **Preamble**

Given the nature of the full planning application, the Climate Response Team defers to the relevant environmental specialists. The following comments have been prepared by the Climate Response team in response to the Sustainability and Energy Statement and Energy document submitted as part of the above outline applications.

##### **Sustainability & Energy Statement**

The Sustainability and Energy Statement refers to the Energy Hierarchy approach, outlining the “be lean”, “be clean” and “be green” steps that are to be taken as part of the proposed development to reduce energy demand and CO2 emissions.

In line with the ‘Be Lean’ element of the Energy Hierarchy, the submitted Sustainability and Energy Statement states that consideration would be given to the design of the buildings to reduce energy consumption and CO2 emissions. This includes, but is not limited to, the

provision of 100% LED lighting, meeting or exceeding the requirements of Part L 2021, promoting passive solar gains and maximising natural lighting.

The submitted documents state that the “specification of building elements (walls, roofs, windows etc) with U-values, thermal bridging and air tightness specifications [would] meet or exceed the minimum requirements of Part L 2021”. Despite this, no details of the anticipated values (e.g. U-values, air tightness, g-values etc.) have been submitted as part of this outline planning application. These details would be required as part of a revised Energy Statement, submitted in support of any future reserved matters application. This should be conditioned.

With regards to the ‘Be Clean’ stage, the Sustainability and Energy Statement considers the use of District Heating Networks and Combined Heat and Power (CHP) systems to be unfeasible for the proposed development. Whilst CHP may have previously been considered a suitable technology, the consensus has now moved on considering the unabated emissions from CHP and the current oil and gas prices. Further to this, the rapid decarbonisation of the National Grid is narrowing the opportunities for CHP to save carbon. As such, the exclusion of CHP from the proposed development is reasonable.

As required by the ‘Be Green’ elements of the Energy Hierarchy, some consideration has been given to the low/ zero carbon technologies that could be feasible for the development site. At the outline stage, this currently consists of air source heat pumps and roof mounted photovoltaic panels. In order to comply with Core Policy 12 of the South Bucks Core Strategy (adopted 2011), all developments with 1,000sqm or more non-residential floor space will need to secure at least 10% of their energy from decentralised and renewable or low-carbon sources, unless demonstrated that it is not viable or feasible. This is dealt with in the Energy document.

The Sustainability and Energy Statement also refers to the fact that consideration would be given to several measures to reduce onsite water consumption through construction and operation, including provision of water metres and water efficient fixtures and fittings. As part of the reserved matters application, it would be necessary for the applicants to confirm what measures are to be incorporated to reduce onsite water consumption and the anticipated water savings from these measures. This has been secured by means of condition. If the reserved matters application were to be approved, details on the final water usage levels in the as-built buildings should also be provided which could be secured by way of condition.

It has also been stated that a Materials and Waste Management Strategy would be submitted as part of the detailed design stage and prior to the construction of each site, a Site Waste Management Plan will be prepared. To ensure that measures to minimise material use and manage waste sustainably are built into the development processes, the submission of this information has been secured by condition.

### **Energy Document**

The submitted Energy document (document 18, dated July 2022) states that in order to meet the requirements of Core Policy 12, the proportion of energy needs being met by air



source heat pumps would be 2.4%, with the remaining 7.6% coming from photovoltaic panels (securing a minimum of 10%). This would be spread across Pinewood South and Alderbourne Farm. The submitted Sustainability and Energy Statement also refers to their voluntary target of 25% and an ambition of 50%, which would be most suitably met by the use of roof mounted PV. It is however acknowledged that at this stage of the planning process, the photovoltaic area, location and generation amount are still subject to further design consideration.

As part of any reserved matters application, it would be necessary for the applicants to provide full details on the low carbon/ renewable technologies that are to be installed at the development site. This should include final confirmation of the low carbon/ renewable technologies that are to be integrated into the developments, full details of the proposed locations of these technologies, detailed calculations on how much energy would be generated by these technologies and evidence that as a minimum, the development would meet the requirements of policy CP12. This should be conditioned.

As part of any reserved matters application, the Sustainability and Energy Statement, or Energy Statement, also needs to be revised to detail the baseline energy consumption and associated CO2 emissions and evidence the anticipated reduction following the integration of the proposed 'be lean', 'be clean' and 'be green' measures. This should be conditioned.

### **Conclusion**

Overall, we have no objections to the proposed works. However, given the outline nature of the planning applications, further details would need to be submitted as part of any reserved matters application to address the comments made above. If the planning officer is minded to approve the application, we recommend the imposition of the following conditions:

### **Condition 1**

As part of the reserved matters phase, an Energy Statement shall be submitted to and approved in writing by the Local Planning Authority. The statement shall include full details on the decentralised, renewable or low-carbon technologies that are to be integrated into the development and shall demonstrate how they will meet at least 10% of the energy demand on site. It shall, as a minimum: calculate the baseline CO2 emissions; the reduction in CO2 emissions achieved from low carbon or renewable sources; U-values, thermal bridging, g-values and air tightness specifications of the development.

Reason: To ensure the development is sustainable and to comply with the requirements of CP12 (Sustainable Energy) of South Bucks Core Strategy (2011), Which states:

*'The Council will promote and encourage energy efficiency and renewable / low carbon energy in all new development through a range of measures in order to contribute towards meeting national targets for reducing CO2 emissions. These will include the following:*

*Requiring that all developments of 10 or more dwellings and 1,000sqm or more non-residential floor space secure at least 10% of their energy from decentralised and*

*renewable or low-carbon sources, unless demonstrated that it is not viable or feasible. In developments of more than 10 dwellings or 1,000 square metres of non-residential floorspace, the Council will require that at least 10% of their energy requirements are from decentralised and renewable or low-carbon sources. Where developers cannot meet this requirement, the Council will require robust professional evidence to demonstrate why this is not feasible or viable.'*

**Condition 2**

No building shall be occupied until suitable evidence demonstrating that the buildings have been constructed and performs in line with the Energy Statement approved through Condition 1 has been submitted to and approved in writing by the Local Planning Authority.

Reason: There is a well-documented "performance gap" in the new build housing market in England whereby construction developments consistently underperform against design. This must be addressed through rigorous monitoring, in line with the monitoring requirements set out in Chapter 4 of the South Bucks Core Strategy.

**Condition 3**

As part of the reserved matters phase, a report providing the final design water usage levels in the buildings and full details of how this is to be achieved, shall be submitted to and approved in writing by the LPA.

Reason: To encourage sustainable development, and to comply with policy CP13 of Core Strategy (Sustainable Energy) of South Bucks Core Strategy (2011).

**Condition 4**

No building shall be occupied until a report providing the final as-built water usage levels and demonstrating that they meet or exceed those laid out in Condition 3 has been submitted to and approved in writing by the Local Planning Authority.

Reason: To encourage sustainable development, and to comply with policy CP13 of Core Strategy (Sustainable Energy) of South Bucks Core Strategy (2011).

**Condition 5**

As part of the reserved matters phase, a report demonstrating that that the applicant has accepted an adequately sized grid connection offer from the relevant network operator is to be submitted to and approved in writing by the Local Planning Authority. This must outline the anticipated demand for the development.

Reason: To comply with Core Policy 6 (Local Infrastructure Needs) of South Bucks Core Strategy (2012). Which states:

*'New development will be required to provide for the necessary infrastructure needs arising from the proposal, either directly or via an appropriate financial contribution. The Council will use planning conditions and obligations where appropriate to secure the timely provision of essential infrastructure directly and reasonably related to a development.'*

**Condition 6**

As part of the reserved matters phase, a Materials and Waste Management Strategy to include a Whole Life Carbon Study shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

#### **Condition 7**

Prior to construction of each site, a Site Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority. This shall include principles for handling, disposing of and managing waste during construction, and confirming targets for the reuse and recycling of waste and diversion of waste from landfill. Construction shall be carried out in accordance with the approved details.

### **Colne Valley Regional Park – 28 September 2022**

#### **Response to proposed development at Pinewood South and Alderbourne Farm**

#### **This response is from and behalf of The Colne Valley Regional Park**

The Colne Valley Regional Park was founded in 1965 when local authorities – including Bucks County Council – showed great foresight in agreeing to work together to preserve and enhance this precious area for recreation and nature conservation. It is supported by more than 80 member organisations including local authorities, businesses, residents' associations, environmental charities and user groups. Groundwork South acts as the Park's managing agent.

#### **The Colne Valley Regional Park has six objectives:**

<https://www.colnevalleypark.org.uk/whats-special/>

#### **Landscape**

The Colne Valley Regional Park (CVRP) covers eight local planning authorities. As a result, the valley is rarely, if ever, considered at a landscape scale.

The creation of a Green Infrastructure Strategy

<https://www.colnevalleypark.org.uk/greeninfrastructure-strategy-downloads/> for the Colne Valley Regional Park aims to bring the green and blue on the map to the forefront of planning policy and decisions, and feature the landscape of the Valley as a whole, rather than from the perspective of its various council boundaries. These boundaries are an administrative convenience – they don't exist as real barriers to people and wildlife. The Crane Valley has been added to this strategy to provide a truly landscape-scale picture of the area.

This cross-border approach is entirely consistent with Green Belt policy in the National Planning Policy Framework.

#### **Summary of response**

The whole site is within the Colne Valley Regional Park and is designated Green Belt. In the Green Belt mitigation and compensation is encouraged by NPPF para 142 for loss of Green Belt. This development proposes significant loss of Green Belt for which very special circumstances are required. A previous application accepted that redevelopment of land known as Pinewood South demonstrated very special circumstances. This new application, however, also includes development on Alderbourne Farm. Loss of Green Belt land to development and loss of agricultural land is proposed which again need to demonstrate very special circumstances. This justification is absent from this application. Does the continued expansion of Pinewood do that perhaps ad infinitum?

The development plan in Core Policy 9 states that sites within the CVRP urban/rural fringe should support and implement CVRP initiatives. This development goes some way towards doing this in creating a nature reserve and allowing some public access at Alderbourne Farm, but this is qualified by only proposing permissive paths. It is not clear how often these paths would be closed to the public, so their usefulness for public recreation is limited. Again the loss of agricultural land is contrary to CVRP objectives, this could in part be mitigated through installation of fencing, corals and vehicle access points to allow conservation grazing to be used as a management tool plus an endowment for future management including covering costs of conservation grazing. The increase in biodiversity goes partly towards mitigation and compensation for the loss of land at Pinewood South to development. The mechanism for long term management of this land is unclear. There is little recognition in the submitted documents that there is a policy initiative to mitigate and compensate in CP9.

With regard to the nature reserve:

- we would need reassurance that there will be a hard boundary between the backlot and the nature reserve to ensure the backlot doesn't spread.
- The primary focus should be on biodiversity with public access to some of the site particularly where it can offer connectivity with the path network in and around the Colne Valley Regional Park. There are too many paths, some of which don't serve a purpose for wider connectivity (eg the loop around the meadow in the NE quarter of the nature reserve).
- The local partnership for managing the site (see below) must have control of the amount of filming taking place at the nature reserve.

We also have concerns regarding the height of the buildings proposed. At between 20 and 25 meters high they will be visible from much of Black Park and will be visible from all the surrounding Green Belt area and residential areas of Iver Heath. The existing studio buildings are visible from afar including from the M25 and Uxbridge. Is it possible that they can be sunk into the ground to reduce their visibility?

In addition, noise and light pollution will have a significant adverse impact on both residents and nature alike.

The air quality in this area, designated an AQMA, is unlikely to be improved by any aspect of this development.

In terms of climate change impact, the continuing coverage of the Green Belt by buildings and tarmac is creating a heat island effect negatively affecting the living conditions of local residents in Iver Heath. What measures are being taken to mitigate this?

We welcome the retention of the permissive footpath known as the Peace Path through to Black Park. However, as part of the mitigation of such a massive development in the Green Belt this must become more formalised and guaranteed in the long term.

In terms of BNG, for Pinewood South the applicants propose improving the boundaries of the site by planting trees, notably along the boundary with Black Park. This is unlikely to obscure the buildings from Black Park for a considerable time. Most of the suggested BNG is on Alderbourne Farm, and concerned primarily with enhancing the Alderbourne river itself, which passes through the site from west to east. However, concern is expressed about development within the buffer of the ancient woodland. There may also be an adverse impact in removing contaminated soils.

The CVRP therefore **objects to this application** due to an absence of justification of very special circumstances, loss of agricultural land, and because inadequate compensation and mitigation has been provided.

**In terms of loss of agriculture and uncertain access to the public for recreational purposes, the application conflicts with our objectives, is inconsistent with the aims of the Regional Park, and may cause actual harm.**

Buckinghamshire Council should therefore support the CVRP in delivering its six objectives which are consistent with this paragraph and is contrary to Core Policy 9 and therefore you should not allow this development as it stands.

Mitigation could be improved by:

- creating a partnership for appropriately managing the nature reserve at Alderbourne Farm with Fulmer Parish Council and/or Colne Valley Regional Park, together with sufficient payment to ensure the site can be managed effectively in perpetuity. Conditions should be included to ensure that the proposed nature reserve is permanent, independent from the film studios, paths cannot be closed and an element of farming is retained through using conservation grazing as part of the site management for biodiversity.
- mitigation in Black Park must be increased from the S106 agreement as part of the previous application. This is because the buildings next to Black Park Country Park are higher with a bigger impact on the Country Park.
- The applicant should be advised by the Colne and Crane Green Infrastructure Strategy when looking at additional mitigation.

### **Colne Valley Regional Park – 20 January 2023**

The Colne Valley Regional Park is a Community Trust funded by Local authorities and with donations from corporate sponsors and members of the public. It therefore operates on a

very limited budget. Pinewood, although it is one of the largest commercial operations in the Regional Park, is not among those sponsors.

I serve on the board of the Colne Valley Park in a voluntary capacity. I am a former local authority planner, and co-ordinate the CVRP's responses on planning applications which have a largely detrimental impact on its six objectives, and on the area generally.

In common with previous application for the site between Pinewood Road and Black Park, we feel the benefits to the CVRP outlined by the developer in its proposals for expansion of Pinewood are of a disappointingly small scale given the colossal size of this project in the Green Belt. We would have preferred to see something more in proportion, considering the considerable impact it will have on the Park and its surroundings.

The CVRP is a designation defined within the South Bucks Proposals Map and given protection within CP9 of the Core Strategy. We are therefore not calling for mitigation for the Regional Park outside the policy context.

Para 3.3.19 of CP9 clearly states that the CVRP presents many opportunities for improvement in line with the five aims of the CVRP (now six objectives). Building within the CVRP harms the features outlined in 3.3.14 such as woodlands, grasslands, fields, crops and open spaces – all covered by our six objectives.

Therefore mitigation, as requested, to compensate for the harm is clearly within the remit of this policy, which in bullet point 5 seeks improvement by supporting and implementing initiatives in the CVRP Action Plan now superseded by the Colne & Crane GI strategy, also relevant to bullet point 4 of the Policy. The site is also within a Biodiversity Opportunity Area as designated on the Proposals Map. The Biodiversity Action Plan, BAP 2030 states on p8, para 16, "This BAP will serve as the interim biodiversity strategy for nature's recovery until such time as finalised LNRs are in place across Buckinghamshire and Milton Keynes.

The concerns we express in our letter regarding the proposed mitigation is that the proposals do not go far enough, and we have suggested ways in which this could be effectively achieved.

We therefore request that Pinewood developments conforms to policy CP9 and asks Buckinghamshire Council to implement it.

### **Colne Valley Regional Park – 2<sup>nd</sup> February 2023**

While we have no wish to prolong the correspondence on this matter, the applicant's representatives appear to be labouring under a misapprehension that we wish to withdraw our original (and subsequent objections) and that for the avoidance of doubt, the Colne Valley Regional Park wishes to reiterate that it remains firmly opposed to the application in its current form.

However, should the applicants want to mitigate their proposals in a way to benefit the objectives of the CVRP and in accordance with policy CP9, then we are happy to meet so that we can come to some mutually agreed proposal.

## Country Parks – 1 December 2022

Our position on the actual development taking place has not really changed, in that we would rather it did not happen as it will have a significant visual and physical impact on Black Park Country Park. The quality of the park on the eastern boundary next to the project site will be significantly degraded by its proximity to the development. However, if it is to happen then this proposal is more positive than the last, and there are some welcome changes that have been made.

**Buffer between development and Black Park.** The most significant element for us in the Landscape Plan is the 30 metre wide landscape corridor between the development and Black Park, in the previous proposal this was 20 metres which we felt was insufficient. We would also request that further work is done to plant and provide additional screening within Black Park itself where possible to achieve a deeper planted boundary screen. Trees such as Chestnut in this area lend themselves to coppicing, which is one of this could be achieved. We would like to request that the developer carries out further work looking at this as an option to strengthen the visual screening of the development from Black Park. We would welcome further discussions on this.

**Fencing.** It is important that the developments palisade security fence is located 30 metres in to the development site and not on the Black Park boundary. In a discussion with their consultants they indicated this was the case, but it needs to be detailed somewhere in the planning conditions, as if it ends up on the boundary then it will be very intrusive and unsightly. Fencing along the boundary with Black Park should be of an agricultural type that is in character with the country park and adjacent landscape.

**Backlot Areas.** We know Pinewood and the film industry very well and we are very concerned about the potential of temporary backlot areas being developed adjacent to the Black Park boundary while they are waiting to construct the actual sound stages. The park already has two backlot areas immediately adjacent to it from the existing studio complex; these are often very messy and aesthetically 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. Can a condition be put in place that in the event of Pinewood not developing the studio facilities or Backlots at Alderbourne Farm, they cannot use the Pinewood South site as a Backlot?

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 proposed development is as aesthetically pleasing as possible.

**Building height and design.** The highest buildings are planned to back on to Black Park. We would argue this should not be the case, as although there are a few residential properties on Black Park Road, significantly more people, our visitors will be impacted in Black Park by the visual intrusion of tall buildings, we feel that the lowest buildings should be on the Black

Park side to at least partially mitigate this. There should also be some requirement for the cladding on the building to be of a type that breaks up their profile and helps disguise them when viewed from Black Park, not sure what it is called!



**Peace Path and access.** We welcome Peace Path remaining in its current location and also the wider public access proposals. The proposed route 3 runs through Black Park, we like this route but have fagged with the developers consultants that the easter bridle path they have routed along in Black Park has no surface in some areas and we would be looking at a contribution to this to help mitigate against potential damage from increased footfall. It should also be improved to improve accessibility for those with limited mobility, buggies etc. The access point into the north east corner of Black Park adjacent to Alderbourne Farm will also require improvement work and upgrading, and safe crossing provision of Fulmer Common Road. We would welcome further discussions on this.

**Access to Black Park from the footway adjacent to the A412.** Black Park has a designated access point onto a public bridleway and public footpath in its south eastern corner. We anticipate more visitors using this once the five point roundabout has traffic lights installed as it will be much safer to cross. However, the vehicle access route to the development site does not seem to have any provision for safe crossing by walkers using the footway. We also feel there is a good opportunity to get Pinewood to fund improvements to this footway as it is in very poor condition and often flooded/muddy.

**Relocation of layby adjacent to proposed site entrance.** I know this is a HWDC issue, but we would strongly object to the lost capacity of this layby being removed to facilitate access to the development site, being relocated to any of the laybys that are adjacent to the Black Park or Langley Park boundaries with the A412. We have significant issues with fly tipping, damage to fences, anti-social behaviour and lay-by users using the park as a toilet, so we really do not want any more capacity on our boundary that would increase this. If it does happen we would expect 6ft high steel palisade fencing to be installed to protect the country parks.

**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 has potential to 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 developer to explore the provision of an access route into Black Park from the Pinewood South development site, there are several places where the internal road network could be extended to the country parks boundary and fairly easily link into our existing track network. We would welcome further discussions on this.

**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, even without the visitor attraction element, will still add considerable pressure to the local road network. 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. This was demonstrated by survey work commissioned by highways development control and delivered by Temple in relation to the previous development proposal. The concern is there are regularly cars slowing suddenly trying to find spaces, cars stopping and reverse parking against the flow of 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 proposed 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.

**Alderbourne Farm.** We welcome the nature reserve proposals, but for clarity, we want to confirm we have no interest in managing this facility. Ecological work in Black Park. Our understanding is previous financial commitments outlined in the original proposal will be honoured in the new development proposal. Can this be confirmed please.

**Ecological work in Black Park.** Our understanding is previous financial commitments outlined in the original proposal will be honoured in the new development proposal. Can this be confirmed please.

**Summary**

**Holding Objection; Insufficient GCN Information Provided.**

**Further Information Required:**

- **Proof of entry into Buckinghamshire Council’s District Licence Scheme – via provision of a NatureSpace Report or Certificate; or**
- **Provision of GCN survey information.**

**For all other matters relating to Ecology please refer to the Ecology Officer’s Comments.**

**Discussion**

The applicant has provided an ecological report, [Extended Phase 1 Habitat Survey Report, Pinewood Studios Group, LUC, September 2021]. Within this report it states that:

*The waterbodies in the centre of the Site were subject to regular high levels of disturbance, fluctuating water levels, periods of drought and fluctuating distributions. Water quality was poor, due to soil runoff from the quarry restoration works and due to a lack of vegetation. Emergent and marginal vegetation was limited to small amounts of quick to establish species such as lesser bullrush *Typha angustifolia* and soft rush *Juncus effusus*, and species indicative of damp regularly disturbed ground. Nevertheless, some areas of standing (particularly in the east by the site compound) were likely to hold water year-round and were therefore considered to have a low potential to support GCN breeding.*

*Waterbodies were identified within 250metres of the Site boundary, though the majority of these were separated from the Site by Pinewood Road and Uxbridge Road. These roads were subject to regular heavy traffic and are considered to represent significant barriers to GCN dispersal. In addition, many of these ponds were ornamental in nature and were either confirmed or were considered highly likely to have fish*

*Environmental DNA (eDNA) surveys have been undertaken for the waterbody area on site and accessible ponds within 250metres of the Site boundary, to confirm presence/ likely absence of GCN. These surveys returned negative results, confirming the likely absence of this species*

*The habitats within the Site comprised recently restored areas of improved grassland, an arable field, hardstanding and areas of bare earth and ephemeral/short perennial habitats. These habitats have a history of regular, high levels of disturbance, and disturbance continues both through the restoration work within the remaining gravel extraction area and through mowing of the grassland. Suitable habitat for amphibians within the Site is therefore limited to the hedgerows, treelines and woodland along the site boundaries, most of which will be retained.*

*There are no suitable great crested newt ponds within the Site, however, three ponds are located 85 – 215 metres to the east of the Site boundary. A busy A-Road (Pinewood Road) forms a physical barrier between the Site and these ponds. Given the presence of a significant physical barrier, the levels of disturbance within the Site and limited habitat suitability, the presence of great crested newt is considered highly unlikely. Amphibians are therefore not considered further within this report*

Aerial imagery has found that there are three ponds on site, it is not clear which ponds have been surveyed. A map of all surveyed ponds should be provided to confirm which ponds have been included.

As the development site is surrounded by suitable terrestrial habitat for great crested newts further information is needed on what measures will be put into place to reduce the risk of harming/killing any great crested newts which traverse across the site.

For all other matters relating to Ecology please refer to the Ecology Officer's comments.

The image below shows a rough outline of the site (red) in the context of the surrounding landscape, including the impact risk zones. Ponds are shown in light blue. A 250m buffer is shown around the site in blue and a 500m buffer in green.





### **Informatives**

#### **Protection of great crested newts and their breeding/resting places**

Informative: The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: deliberately capture, disturb, injure or kill great crested newts; damage or destroy a breeding or resting place; deliberately obstructing access to a resting or sheltering place. Planning consent for a development does not provide a defence against prosecution under these acts. Ponds, other water bodies and vegetation, such as grassland, scrub and woodland, and also brownfield sites, may support great crested newts. Where proposed activities might result in one or more of the above offences, it is possible to apply for a derogation licence from Natural England or opt into Buckinghamshire Council's District Licence. If a great crested newt is encountered during works, all works must cease until advice has been sought from Natural England, as failure to do so could result in prosecutable offences being committed.

### **Legislation, Policy and Guidance**

#### **Lifespan of Ecological Reports and Surveys**

Validity of ecological reports and surveys can become compromised overtime due to being out-of-date. CIEEM Guidelines for Ecological Report Writing (CIEEM, 2017) states, if the age of data is between 12-18 months, "the report authors should highlight whether they consider it likely to be necessary to update surveys". If the age of the data is between 18 months to 3 years an updated survey and report will be required and anything more than 3 years old "The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated".

#### **Reasonable Likelihood of Protected Species**

Permission can be refused if adequate information on protected species is not provided by an applicant, as it will be unable to assess the impacts on the species and thus meet

the requirements of the National Planning Policy Framework (2019), ODPM Circular 06/2005 or the Conservation of Habitats and Species Regulations 2017. The Council has the power to request information under Article 4 of the Town and Country (Planning Applications) Regulations 1988 (SI1988.1812) (S3) which covers general information for full applications. CLG 2007 'The validation of planning applications' states that applications should not be registered if there is a requirement for an assessment of the impacts of a development on biodiversity interests.

Section 99 of ODPM Circular 06/2005 states:

*"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations before permission is granted."*

### **Great crested newts**

Great crested newts and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Therefore it is illegal to deliberately capture, injure, kill, disturb or take great crested newts or to damage or destroy breeding sites or resting places. Under the Wildlife and Countryside Act 1981 (as amended) it is illegal to intentionally or recklessly disturb any great crested newts occupying a place of shelter or protection, or to obstruct access to any place of shelter or protection (see the legislation or seek legal advice for full details). Buckinghamshire Council have a statutory duty in exercising of all their functions to 'have regard, so far is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity', as stated under section 40 of the Natural Environment and Rural Communities Act 2006 (NERC). As a result GCN and their habitats are a material consideration in the planning process.

### **Ecology Newt Officer– 7 November 2022**

#### **Summary**

**No Objection subject to provision of a precautionary working statement in the form of a CEMP. A great crested newt Informative has been provided.**

**For all other matters relating to Ecology please refer to the Ecology Officer's Comments.**

#### **Discussion**

In response to the further information provided (220929 Response to Newt Officer Consultation) it has been made evident that the onsite ponds are no longer present onsite due to previous works.

- 2.5. The Pinewood South site has in any event been subject to an Update Phase 1 Habitat survey (see appendix 8.2 of the ES). This update survey recorded that all former on-site ponds (water bodies associated with quarrying) no longer exist. As such, not only are Great Crested Newts confirmed to be likely absent from the site, there are now no onsite breeding opportunities for amphibians.

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During surveys in spring 2022, no GCN were encountered within the red line at Alderbourne Farm. The only positive survey result in the 500m buffer zone is in Black Park. This pond (P3 on the survey) is 450m distant from the developable area and surrounded by high quality habitat. As for Ponds P5 to P9, there would be no impulse for any such GCN to enter the proposed developable area at Alderbourne Farm and hence no prospect of an offence under protected species legislation. No Natural England licence would be required.

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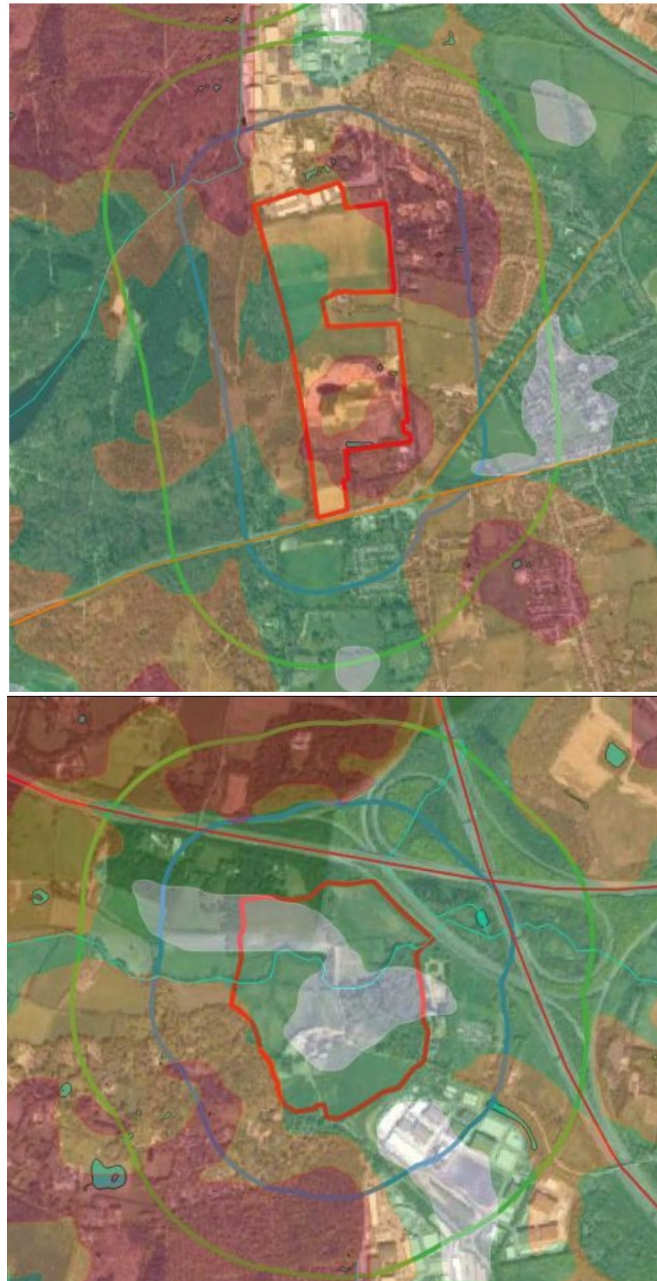
Further to this, all assessable ponds have been surveyed with only one being positive for great crested newts. Therefore I am satisfied that a CEMP will address any residual risk of encountering GCN on site.

However, the application site lies within a red impact zone as per the modelled district licence impact map, which indicates that there is highly suitable habitat for GCN within the area surrounding the application site. Therefore, I recommend using the informative provided below.

For all other matters relating to Ecology please refer to the Ecology Officer's comments.

The image below shows a rough outline of the site (red) in the context of the surrounding landscape, including the impact risk zones. Ponds are shown in light blue. A 250m buffer is shown around the site in blue and a 500m buffer in green.





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*works , all works must cease until advice has been sought from Natural England, as failure to do so could result in prosecutable offences being committed.*

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*“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations before permission is granted.”*

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## Ecology – 16 January 2023

### Summary

**No objection, subject to conditions**

### Discussion

The proposed development site includes Pinewood South which is within the same footprint of the previously approved application PL/20/3280/OA and Alderbourne Farm (a separate farmland to the north of Pinewood South) where a nature reserve (covering 41.23 hectares) is proposed.

There is scope to mitigate the effects of both development site proposals by habitat creation and enhancement within the allocated nature reserve in Alderbourne Farm.

The nature reserve will also be the offset site to compensate for the biodiversity loss resulting from the separate application development PL/21/4074/FA (Five Points Roundabout Junction Of A412).

The application is supported by an Environmental Statement that includes Chapter 8: Biodiversity and a Submission of Additional Information: Environmental Impact Assessment (Turley, December 2022) that included the results of the additional surveys carried out in Alderbourne Farm.

I carried out a site visit of both Pinewood South and Alderbourne Farm on 28th July 2022 and received replies from the consultant ecologists to my queries in relation to the metric and the survey work.

The previously submitted reports for Pinewood South by LUC (dated 2020-2021) were considered and the following up to date reports were reviewed:

- Biodiversity Net Gain Assessment (Aspect Ecology, July 2022)
- Response regarding Biodiversity Net Gain (Aspect Ecology, 9 November 2022)

### Pinewood South

- Technical Briefing Note: Ecological Baseline (Aspect Ecology, 14 June 2022)

### **Alderbourne Farm**

- Ecology Desk Study (TEP, May 2022)
- Extended Phase 1 Habitat Survey (TEP, June 2022)
- Bat Roost Survey Baseline (Buildings and Trees) (TEP, June 2022)
- Bat Activity Survey Baseline (INTERIM) (TEP, June 2022)
- Bat Roost Surveys Baseline (Buildings and Trees) (TEP, September 2022)
- Bat Activity Survey Baseline (TEP, November 2022)
- Data Analysis and Presentation Protocol (TEP, December 2022)
- Breeding Bird Technical Report (TEP, May 2022)
- Breeding Bird Survey (TEP, September 2022)
- Reptile Survey Baseline (INTERIM) (TEP, May 2022)
- Reptile Survey Baseline (TEP, November 2022)
- Dormouse Survey Baseline (TEP, September 2022)
- Otter and Water Vole Survey Report (TEP, September 2022)
- A Terrestrial Invertebrate Assessment (Conops Entomology Ltd for TEP, 27 September 2022)

### **Site Designations**

#### **Black Park Site of Special Scientific Interest (SSSI) and Black Park Local Nature Reserve (LNR)**

Black Park SSSI is located within approximately 360m north-west of the proposed development site (Pinewood South) and is set within the Black Park Local Nature Reserve (located immediately adjacent to the north-west boundary of the Site), Black Park Country Park and Colne Valley Regional Park. Alderbourne Farm is located within approximately 18m from the Local Nature Reserve boundary and within approximately 510m of the site. The SSSI is designated for a variety of habitats comprising dry and wet heath, alder carr, mixed and coniferous woodland and small areas of acid grassland. The heathland and alder carr are of particular importance, as both habitats are very rare in Buckinghamshire. They support specialised communities of plants and animals, including many that are rare or uncommon in the county (such as hobby, nightjar, adder, grass snake, common lizard, smooth newt, as well as national rare and nationally scarce invertebrates – beetles, crickets, butterflies, dragonflies, damselflies).

The proposed development site falls within the SSSI Impact Risk Zone for Black Park SSSI. In line with the response from Natural England a Construction Environmental Management Plan will be required to outline measures to take prior to works commencing in order to prevent/ minimise the impacts of the proposed development to the SSSI. These measures cover prevention of deposition of dust/pollution, disturbance, trampling of the ground flora, timing the works outside the nesting bird season and works to be supervised by an Ecological Clerk of Works.

#### **Ancient Woodland**

The red line boundary of Alderbourne Farm includes Browns Wood which is an ancient and seminatural woodland. It is also opposite (separated by a road) to ancient and semi-natural woodland Parkspring Wood. Another parcel of ancient and semi-natural woodland is adjacent to the north boundary of the site. It should be noted that the proposed car park for the allocated nature reserve is located next to Browns Wood. Ideally, a larger buffer zone should be maintained between the boundary of the ancient woodland and the proposed car park. We welcome the linear scrub to be planted to buffer the woodland and prevent parking within the buffer zone if car park overflows.

### **NERC Act Section 41 Habitat of Principal Importance**

The red line of Alderbourne Farm includes areas of NERC Act Section 41 Habitat of Principal Importance – Priority Habitats Deciduous Woodland, Wood pasture and parkland, and River.

### **Biological Notification Site**

Pinewood South boundary is adjacent to Biological Notification Site (BNS) Black Park. Biological Notification Sites are selected sites within the county that are highly diverse. Following detailed survey and assessment according to the Local Wildlife Site (LWS) criteria these sites can be designated as Local Wildlife Sites.

### **Biodiversity Opportunity Area**

Biodiversity Opportunity Areas (BOAs) identify habitat creation and restoration priorities for different parts of the county using a targeted landscape-scale approach.

Pinewood South lies within the South Bucks Heaths and Parklands BOA and Alderbourne Farm partly lies within the South Bucks Heaths and Parklands BOA and partly within the Colne Valley BOA.

Target habitats for management, creation and/or restoration for South Bucks Heaths and Parklands BOA include woodland, wood pasture/parkland, traditional orchards, hedgerows, ponds, lowland heathland, lowland dry acid grassland, lowland calcareous grassland, and lowland fen.

Target habitats within the Colne Valley BOA include rivers and streams, lakes and ponds, reedbed, woodland, lowland meadow, purple moor grass and rush pasture, fen, wood pasture and parkland, traditional orchard and hedgerows.

Further information can be found at <https://bucksmknep.co.uk/boa/south-bucks-heaths-andparklands/> and <https://bucksmknep.co.uk/boa/colne-valley>.

### **Existing Habitats**

#### **Pinewood South**

The site comprises buildings and hardstanding, modified grassland, lowland mixed deciduous woodland, ruderal/ephemeral vegetation, cereal crops, vegetated garden, mixed scrub, bramble scrub, introduced shrub, native hedgerows with trees, and ditches. For the purpose of the Biodiversity Net Gain assessment and metric the restored habitats (secured via conditions to applications CM/32/17, CM/34/17 and CM/35/17) were considered as baseline habitats in line with the Biodiversity Metric 3.1 User Guide. These restored habitats included grassland, native species-rich hedgerows and ditches.

### **Alderbourne Farm**

The site consists of developed land (buildings and hardstanding), ornamental pond, introduced shrub, modified grassland, other neutral grassland, mixed scrub, lowland mixed deciduous woodland (ancient and semi-natural woodland and priority habitat woodland), wet woodland, wood pasture and parkland, mixed scrub, ruderal/ephemeral, ponds, native hedgerows, lines of trees, and ditches.

## **Biodiversity Net Gain**

### **Background, Policy and Legal Requirements**

Biodiversity Net Gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. The Environment Act 2021 sets out the key components of mandatory biodiversity gain. There is a transitional two-year implementation period with the mandatory requirement for 10% BNG due to come into force in November 2023.

During the transition period, the development proposals need to demonstrate measurable gains in biodiversity in accordance with the National Planning Policy Framework (NPPF) and relevant Local Planning policies (Core Policy 9: Natural Environment - South Bucks District Core Strategy).

Buckinghamshire Council has an adopted Biodiversity Net Gain Supplementary Planning Document (BNG SPD) which provides further information on how BNG can be achieved in Buckinghamshire. Buckinghamshire Council has an aspiration to achieve at least a minimum 10% net gain.

### **Applying the Mitigation Hierarchy (Principle 1 of achieving BNG)**

Biodiversity Net Gain should be achieved following 'The BNG Good Practice Principles' (CIRIA, CIEEM, IEMA, 2016). Achieving BNG requires compliance with the mitigation hierarchy with adverse impacts on the natural environment first **avoided**.

The Biodiversity Metric cannot be used to demonstrate BNG in instances where there is a loss of very high distinctiveness (most priority) habitats. If these are shown to be lost then the error 'Bespoke compensation likely to be required' is displayed within the calculator.

Where the loss of a priority habitat is unavoidable then bespoke compensation should be provided in agreement with the LPA.

Where impacts are unavoidable the project should seek to mitigate the adverse affect onsite. Only as a last resort should compensation be provided. This should be onsite first and then only where not possible offsite. Offsite compensation should remain as close to the impact as possible whilst seeking to deliver high value ecological areas.

### **Irreplaceable Habitats**

Where the project has an adverse impact on an irreplaceable habitat, the project can not claim that BNG has been achieved. However, the metric can still be used as a tool to demonstrate that a suitable level of compensation has been provided for the loss of other habitats.

### **Proposed Development**

According to the revised Biodiversity Metric 3.1 (dated 03/11/2022) it is predicted that the proposed development will result in a total net unit change of 83.50 habitat units, 11.48 hedgerow units and 5.24 river units (total net % change of 26.28% in habitat units, 21.48% in hedgerow units and 29.81% river units).

The net gain in all elements of the metric is based mainly on habitat enhancement/creation in the allocated nature reserve in Alderbourne Farm. Habitats proposed in the reserve include new ponds and wetland, scrub and woodland planting, orchard creation and species-rich neutral grassland.

The net gain to be achieved is sufficient to offset the biodiversity loss (of -8.02 habitat units equivalent to -20.21 total net % change) resulting from the separate application development PL/21/4074/FA (Five Points Roundabout Junction Of A412).

The applicant proposes to undertake the habitat enhancement/creation works and pass the long-term (30 year) management requirement of the nature reserve to a management body (such as a Trust). It is recommended that both the nature reserve and the long-term management and associated offsetting scheme for application PL/21/4074/FA are secured in a Section 106 Agreement.

Recreational pressure in the proposed nature reserve should be considered in advance of the completion of the reserve management plan. I would strongly recommend that consideration is given to areas within the site boundary that will still be publicly inaccessible to retain high diversity (i.e. ancient woodland, priority woodland areas).

### **Construction Environmental Management Plan**

A Construction Environmental Management Plan (CEMP) must be produced to take the SSSI, BNS, ancient woodland, priority habitats, protected and notable species into

consideration. The CEMP should also address the protection of habitats to be retained and enhanced (in line with the agreed Biodiversity Net Gain Assessment).

The CEMP should include the following details in accordance with the British Standard on Biodiversity BS 42020:2013:

#### **Proposed Ecological Impacts**

- Details of what biodiversity features could be impacted (in that phase) and what development activities could be potentially damaging.

#### **Timetables**

- A rolling timetable of when and where specific measures to avoid / reduce impacts are to be carried out including any seasonal or legal implications (e.g. the bird nesting season) and who is responsible.
- The nature of the pre-commencement ecological checks / surveys required and details of the results of these surveys once they have been undertaken (for our approval).

#### **Avoidance and Mitigation Measures**

- Details of method statements for specific biodiversity issues (e.g. for specific destructive activities such as: vegetation clearance, hedgerow removal, tree felling, soil stripping and building demolition).
- Identify all practical measures (e.g. fencing, protective barriers and warning signs) and sensitive working practices to avoid impacts. We expect to see details of type, location and means of installation and maintenance FOR EACH PHASE.
- Specifically state the agreed buffer zones relevant to each phase. For example a minimum buffer of 5m around all on-site hedgerows and ditches has been agreed, but this will need to be increased in some phases to protect other biodiversity features (e.g. where badger setts and mature trees are present).
- Details of inspections to ensure wildlife (e.g. badgers and brown hares) do not become trapped in excavations or machinery.

#### **On-site Personnel & Training**

- The role and responsibility of the on-site Ecological Clerk of Works (ECOW) in each phase should be clearly stated including which works require supervision by the ECOW in relation to the current timetable for that phase.
- Evidence that an ECOW has been appointed for each phase and has an appropriate level of experience.
- Details of other responsible person and lines of communication on-site in relation to the implementation of the CEMP.
- Details of any awareness training of on-site non-ecological personnel such as tool box talks provided by the ECOW.
- Who will be responsible for erection and maintenance of on-site fencing, protective barriers and warning signs.
- Who is responsible for compliance with regulations, legal consents, planning conditions, environmental procedures and contractual agreements and the issuing of periodic reports on success and compliance. These periodic reports should

feedback into the CEMP for the subsequent phase and ensure the results of this regular review are effectively communicated to on-site staff.

#### **Monitoring, Compliance, Contingency and Emergency Measures**

- Details of contingency measures in the event of an accident or other potentially damaging incident (e.g. pollution incidents; how to deal with previously unrecorded protected species found during construction and restoration; unexpected bad weather; repair of damaged features etc.).
- Details of procedures to avoid pollution incidents (e.g. from fuel spills and site run-off based on an understanding of the wildlife interest at risk).
- Regular review of the implementation of CEMP throughout the construction / restoration phase to monitor effectiveness of mitigation measures and compliance with legal, planning and/or contractual requirements.
- Details of biosecurity protocols / method statements to prevent spread of non-native species between sites.
- Temporary management of existing wildlife features during construction / implementation.
- Ensure copies of all ecological reports relevant to sites works, relevant planning conditions and any protected species licences are kept in the site office and are available to refer to at any time.

#### **Landscape and Ecological Management Plan**

To reduce the impacts of the development, as well as securing the implementation of biodiversity net gain and incorporating opportunities for wildlife in and around the development once works are complete, I recommend that a Landscape and Ecological Management Plan (LEMP) for the site is produced and secured via a condition to any approval granted.

The LEMP should include the following details in line with the British Standard on Biodiversity BS 42020:2013:

- Description and evaluation of features to be managed.
- Ecological trends and constraints on site that might influence management.
- Aims and objectives of management which will (without limitation) include the provision of biodiversity net gain within the Site as shown within the Biodiversity Gain Plan
- 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).
- Details of the body or organization responsible for implementation of the plan.
- Ongoing monitoring and remedial measures.

The LEMP should also include details of biodiversity enhancements, such as the type and location of bat and bird boxes, wildlife kerbs, insect boxes, hibernacula, log piles etc.

#### **Protected Species**

## **Bats**

### Pinewood South

From previous 2020-2021 bat activity and trapping surveys it was found that a colony of Bechstein's Bats (an Annex II species listed in the Conservation of Habitats and Species Regulations) is present within approximately 100m of the northwest corner of Pinewood South.

Bechstein's bats have been recorded commuting through Pinewood South, in particular along Peace Path and at a location south of the site. It was confirmed that Peace Path will be enhanced and dark corridors will be maintained around the periphery of the site in proximity to Black Park.

In addition to Bechstein's bat, a minimum of eight species were recorded within Pinewood South, including common pipistrelle, soprano pipistrelle, Myotis species, pipistrelle species, Leisler's bat, noctule and setorine.

Several trees were found to have high suitability for roosting bats along the boundary adjacent to Black Park and moderate suitability along the northern site boundary. Soprano pipistrelle day roosts were found in two trees along the northern boundary along Peace Path.

### Aldbourn Farm

From bat activity and transect 2022 surveys a total of twelve species were recorded in Alderbourn Farm including common pipistrelle (51.73% of total registrations), soprano pipistrelle, Nathusius' pipistrelle, brown long-eared bat, noctule, Leisler's bat, serotine, Daubenton's bat, Natterer's bat, whiskered bat, Brandt's bat and barbastelle (Annex II species).

A preliminary roost assessment was carried out in buildings within Alderbourn Farm and five buildings (B2, B7, B8, B10, B11) were found to have moderate suitability for roosting bats and two buildings (B3, B4) were found to have high suitability. The rest of buildings were found to have low suitability.

From the 2022 activity surveys three of the buildings within Alderbourn Farm were found to support roosting bats:

- Building B3 (two-storey brick-built farmhouse) supports day roosts of common pipistrelle and soprano pipistrelle
- Building B4 (single-storey brick-built farm building/stable) supports a day roost of brown long-eared bat
- Building B6 (corrugated storage barn) supports day roosts of common pipistrelle and soprano pipistrelle



A Natural England European Protected Species licence will be required to proceed with the proposed works. I would recommend that a condition relating to the licence is attached to any approval granted.

Given that a brown long-eared bat roost was recorded and brown long-eared bats are roof-void species and owing to the overall bat activity within Alderbourne Farm and Pinewood South a purposebuilt bat loft building is recommended to be erected within the nature reserve. Plans of the bat loft should be secured via a condition to any approval granted. The plans should indicate the location within the reserve and construction of the building, including access points for bats, hot box if required, and bitumen lining.

No tree roosts were found in the trees potentially being affected. One tree, a mature English oak (T22) to be removed has high suitability for roosting bats and was subject to survey work. No roosting bats were recorded. I would recommend that the demolition of buildings and removal of trees with roosting bat suitability and the safeguarding of bats is addressed in the CEMP. A number of bat boxes, is expected to be included in the LEMP.

### **Nesting Birds**

Five Red-listed bird species including house sparrow, greenfinch, linnet, mistle thrush and swift and eleven Amber-listed species including red kite, kestrel, bullfinch, mallard, stock dove, sparrowhawk, song thrush, whitethroat, woodpigeon and wren were recorded in Alderbourne Farm.

Ten species were confirmed breeding within Alderbourne Farm including five in the developed area and seven in the proposed nature reserve. These included Amber-listed whitethroat, wren and Redlisted house sparrow.

Swallows were also recorded but not nesting in the farm buildings. I would recommend that nesting birds at both Pinewood South and Alderbourne Farm are addressed in the CEMP. A number of bird boxes, including swift bricks, is expected to be secured via the LEMP.

### **Badger**

There are no badger setts in the development zone of both Pinewood South and Alderbourne Farm. I recommend that the protection of badger is addressed in the CEMP.

### **Hazel dormouse**

No dormice were recorded during the dormouse survey. It is welcomed that habitat for hazel dormouse will be targeted for the nature reserve.

### **Otter and Water vole**

No evidence of water vole was found in any of the ditches and along the Alderbourne river during the May and August 2022 surveys. Otter prints were recorded along the Alderbourne river during the August 2022 survey.

Five ditches in Alderbourne Farm were found to be suitable for water vole. We welcome enhancement of the existing ditches for water vole and creation of a new ditch. I agree

with the recommendations in the report that “If there is a requirement for any works to affect the banks of the river or ditches (e.g. connection of a new floodplain wetland scheme to the river), a repeat inspection should be made to ensure no incidental damage to habitats or animals”.

### **Reptiles**

Three reptile species (common lizard, grass snake and slow-worm) have been recorded in Pinewood South during previous 2020 surveys. Juvenile grass snake and juvenile common lizard recorded indicating breeding populations. Habitat enhancement/creation and long-term management has to be considered along the boundaries of Pinewood South for reptiles.

Although reptiles were recorded in Pinewood South, no reptiles were recorded in Alderbourne Farm during the May-June 2022 reptile survey. It should however be noted that the number of refugia mats was overall low given the size and suitability of habitats. Nevertheless, no further reptile survey is considered necessary as the development area is mainly on existing developed land however owing to the likelihood of reptiles being encountered during the construction phase of the development reptiles should be addressed in the CEMP. Enhancements for reptiles within the nature reserve (e.g. log piles, hibernacula) and habitat management for reptiles should be addressed in the LEMP (e.g. tussocky grassland areas with scrub).

### **Amphibians**

For great crested newt matters please refer to the Newt Officer’s comments.

As water bodies are proposed in the nature reserve but also attenuation features in both the Alderbourne development site and Pinewood South I would recommend that wildlife kerbs are installed and secured via the CEMP and LEMP. It is highly likely that common toad (a NERC Act Section 41 Species of Principal Importance) is present within the application site and wildlife kerbs are required to prevent fatalities in road drains.

### **Invertebrates**

Alderbourne Farm was found to be a site of District value for invertebrates with a combined total of 397 species recorded from across the whole Alderbourne site, 31 of which have a nationally significant status.

The site comprises a rich invertebrate fauna with 264 species found in the development area and 251 species in the proposed nature reserve.

Small heath butterfly was recorded which is a NERC Act Section 41 Species of Principal Importance, the Nationally Scarce rot hole breeding hoverfly *Myolepta dubia*, the provisionally Red Data Book 2 stilt-legged fly *Rainieria calceata* and the Red Data Book 3 beetle *Aulonothroscus brevicollis*.

I agree with the report that by habitat creation/enhancement and long-term management within the nature reserve and the green infrastructure across the development sites any effects on invertebrate species can be mitigated. Management of habitat and enhancement measures for invertebrates e.g. bee banks, log piles should be

addressed in the LEMP. The species foodplants should be planted and management to be designed according to species' life cycles.

### **Artificial Lighting**

Bats may be impacted by artificial lighting as a result of the proposed development. Artificial lighting design needs to be designed in accordance with the 'Guidance Note 08/18: Bats and artificial lighting in the UK' (Institute of Lighting Professionals, 2018).

Sources of lighting which can disturb bats are not limited to roadside or external security lighting, but can also include light spill via windows, permanent but sporadically operated lighting such as sports floodlighting, and in some cases car headlights.

Where bat features or habitats are particularly important or sensitive it may be appropriate to avoid, redesign or limit lighting accordingly. Examples of mitigation measures include dark buffers, illuminance limits and zonation, appropriate luminaire specifications, sensitive site configuration, screening, glazing treatments, creation of alternative valuable bat habitat on site, dimming and partnight lighting. Refer to Guidance Note 08/18 by the Institute of Lighting Professionals for more details.

Lighting details are required to be secured via a condition to any approval granted. An illuminance plan/contour plots should be provided which show the extent of light spill and its intensity (minimum and maximum lux values). Models should include light from all luminaires, and each should be set to the maximum output anticipated to be used in normal operation on site.

We expect to see plans with dark zones maintained at bat dispersal routes (e.g.. Peace Path) and bat hop overs in Pinewood South and in Alderbourne Farm to maintain the favourable conservation status of Annex II Bechstein's bat and barbastelle and of other bat species. No lighting should be installed in the nature reserve and no lighting to be introduced to the ancient woodland Browns Wood (no lighting at the proposed nature reserve car park).

### **Legislation, Policy and Guidance**

#### **European Protected Species Licensing**

Before granting planning permission, the local planning authority should satisfy itself that the impacts of the proposed development on European Protected Species (EPS) have been addressed and that if a protected species derogation licence is required, the licensing tests can be met, and a licence is likely to be granted by Natural England.

As a EPS licence is required the applicant will need to provide the answers to all three licensing tests, alongside a mitigation strategy. The three tests are that:

1. the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;

2. there must be no satisfactory alternative; and
3. favourable conservation status of the species must be maintained.

Together with the ecologist's report, which answers test 3, the applicant should provide written evidence for tests 1 & 2. This can be contained within the ecological report or as separate document.

If the competent authority is satisfied that the three tests can be met, it should impose a planning condition preventing the development from proceeding without first receiving a copy of the EPS licence or correspondence stating that such a licence is not necessary.

This approach ensures compliance with the Conservation of Habitats and Species Regulations 2017(as amended) and enables a local planning authority to discharge its obligations under the Crime and Disorder Act and its wider duties under Section 40 of the Natural Environment and Rural Communities Act 2006 in relation to protected species.

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### **Ancient Woodland**

The Natural England and Forestry Commission Standing Advice ([Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](http://www.gov.uk)) for ancient woodland, ancient trees and veteran trees is a material planning consideration for local planning authorities (LPAs). Decisions have to be made in line with paragraph 180 (c) of the NPPF.

Paragraph 180c of the NPPF states that: "Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 63 and a suitable compensation strategy exists.

*(63) For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.*

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### **NERC Act Section 41 Habitat and Species of Principal Importance**

Local planning authorities have a duty to conserve biodiversity under the Natural Environment and Rural Communities Act 2006 (NERC Act 2006).

The NERC Act 2006 requires that the Section 41 habitat and species list be used to guide decisionmakers, such as public authorities, in implementing their duty under Section 40 of the NERC Act 'to have due regard' to the conservation of biodiversity when carrying out their normal functions.

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### **Biological Notification Site (BNS)**

Paragraph 179 of the National Planning Policy Framework (NPPF) states "To protect and enhance biodiversity and geodiversity, plans should:

*(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity 61 ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation 62 ; and*

*(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

### **Biodiversity Net Gain**

The Environment Act 2021 sets out the key components of mandatory biodiversity gain:

- Amends Town & Country Planning Act (TCPA);
- Minimum 10% gain required calculated using the Biodiversity Metric & approval of a biodiversity gain plan;
- Habitat secured for at least 30 years via planning obligations or conservation covenants;
- Delivered on-site, off-site or via a new statutory biodiversity credits scheme; and
- National register for net gain delivery sites

Paragraph 120a of the National Planning Policy Framework (NPPF) states: *“Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside”*

Paragraph 174d of the NPPF requires that: *“Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure”.*

The NPPF in section 179b states: *“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Paragraph 180d of the NPPF states that: *“When determining planning applications, local planning authorities should apply the following principles...development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”*

### **Biodiversity Net Gain Supplementary Planning Document**

The BNG SPD was adopted by Buckinghamshire Council. It sets out a Buckinghamshire process for achieving net gain and aids planning applicants in ensuring their development would result in a biodiversity net gain. It also sets out a Buckinghamshire process for compensating for losses of biodiversity using off-site habitats and guides landowners in offering their land for BNG.

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### **Core Policy 9: Natural Environment - South Bucks District Core Strategy**

Buckinghamshire Council resolved to withdraw the Chiltern and South Bucks Local Plan 2036 on 21st October 2020. The Core Strategy for the South Bucks District area (adopted February 2011) '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 the Chilterns AONB and its setting will be achieved by ensuring that all development complies with the purposes of the AONB and its Management Plan.*

*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 13 of 16 SAC. Further details on mechanisms for achieving this will be given in the Development Management DPD.*

*More generally, 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.*
- *Seeking biodiversity, recreational, leisure and amenity improvements for the River Thames setting where opportunities arise, for example at Mill Lane (see Core Policy 15).*

*Further guidance on the protection and enhancement of landscape and biodiversity resources will be given in the development Management DPD."*

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### **Planning Obligation (Section 106)**

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## **Biodiversity Net Gain Scheme**

A planning obligation will be required to secure the nature reserve and a Biodiversity Gain Scheme for application PL/21/4074/FA – Five Points Roundabout Junction Of A412 as the nature reserve will be also the offset site for that separate application. The land must be secured and managed for Biodiversity Net Gain for a minimum of 30 years.

The council will also require a monitoring fee to ensure the outcomes of the Biodiversity Net Gain Scheme are achieved. The council has draft section 106 wording for this purpose which can be requested from the Ecology Team or Legal Team.

## **Conditions**

### **Control to ensure EPS licence is provided ahead of commencement**

*The following works shall not in any circumstances commence unless the local planning authority has been provided with either: a) a licence issued by Natural England pursuant to Regulation 53 of The Conservation of Habitat and Species Regulations 2017 (as amended) authorising the specified activity/development to go ahead; or b) a statement in writing from a suitably qualified ecologist to the effect that they do not consider that the specified activity/development will require a licence. Reason: To comply with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) and to protect species of conservation importance.*

Relating to the EPS licence and the safeguarding of bats an additional condition to secure the plans of the purpose-built bat loft building in the nature reserve is also required.

### **Lighting design strategy for light-sensitive biodiversity**

*Prior to occupation, a “lighting design strategy for biodiversity” shall be submitted to and approved in writing by the local planning authority. The strategy shall:*

- 1. identify those areas/features on site that are particularly sensitive for 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*
- 2. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) 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.*

*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: To comply with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) and to protect species of conservation importance.*

## **Construction Environmental Management Plan**

*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.*

- 1. Risk assessment of potentially damaging construction activities.*
- 2. Identification of "biodiversity protection zones".*
- 3. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- 4. The location and timing of sensitive works to avoid harm to biodiversity features.*
- 5. The times during construction when specialist ecologists need to be present on site to oversee works.*
- 6. Responsible persons and lines of communication.*
- 7. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- 8. Use of protective fences, exclusion barriers and warning signs.*
- 9. Current soil conditions of any areas designated for habitat creation and detailing of what conditioning must occur to the soil prior to the commencement of habitat creation works (for example, lowering of soil pH via application of elemental sulfur);*
- 10. Descriptions and mapping of all exclusion zones (both vehicular and for storage of materials) to be enforced during construction to avoid any unnecessary soil compaction on area to be utilised for habitat creation;*
- 11. Details of both species composition and abundance where planting is to occur;*
- 12. Proposed management prescriptions for all habitats for a period of no less than 30 years*
- 13. Assurances of achievability;*
- 14. Timetable of delivery for all habitats; and*
- 15. A timetable of future ecological monitoring to ensure that all habitats achieve their proposed management condition as well as description of a feed-back mechanism by which the 15 of 16 management prescriptions can be amended should the monitoring deem it necessary. All ecological monitoring and all recommendations for the maintenance/amendment of future management shall be submitted to and approved in writing by the Local Planning Authority.*

*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, and thereafter maintained in accordance with the approved details.*

*Reason: To ensure the protection of priority habitats and protected species during construction, and that the development achieves a net gain in biodiversity.*

## **Landscape and Ecological Management Plan (LEMP)**



*No development shall take place (including demolition, ground works, vegetation clearance) unless and until the Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following.*

- 1. Description and evaluation of features to be managed.*
- 2. Ecological trends and constraints on site that might influence management.*
- 3. Aims and objectives of management which will (without limitation) include the provision of biodiversity net gain within the Site as shown within the Biodiversity Gain Plan*
- 4. Appropriate management options for achieving aims and objectives.*
- 5. Prescriptions for management actions.*
- 6. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- 7. Details of the body or organization responsible for implementation of the plan.*
- 8. Ongoing monitoring and remedial measures.*

*The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall be for no less than 30 years. 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 protection and enhancement of biodiversity, to make appropriate provision for natural habitat and biodiversity enhancements within the approved development and to provide a reliable process for implementation and aftercare.*

### **Biodiversity Monitoring Strategy**

*No development shall take place, including demolition, ground works and vegetation clearance, until a biodiversity monitoring strategy has been submitted to, and approved in writing by, the local planning authority. The purpose of the strategy shall be to report to the Local Planning Authority on progress towards achieving Biodiversity Net Gain. The content of the Strategy shall include the following.*

- 1. Aims and objectives of monitoring to match the stated purpose.*
  - 2. Identification of adequate baseline conditions prior to the start of development.*
  - 3. Appropriate success criteria, thresholds, triggers and targets against which the effectiveness of the various conservation measures being monitored can be judged.*
- 16 of 16
- 4. Methods for data gathering and analysis.*
  - 5. Location of monitoring.*
  - 6. Timing and duration of monitoring.*
  - 7. Responsible persons and lines of communication.*
  - 8. Review, and where appropriate, publication of results and outcomes.*

*A report describing the results of monitoring shall be submitted to the local planning authority at intervals identified in the strategy. The report shall also set out (where the results from monitoring show that conservation aims and objectives are not being met) how contingencies and/or remedial action will be identified, agreed with the local planning authority, and then implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The monitoring strategy will be implemented in accordance with the approved details.*

*Reason: to ensure that the development achieves a net gain in biodiversity.*

**If the development is delivered in phases there is also this additional condition:**

**Phased Biodiversity Net Gain Plan**

*Condition: No development shall take place (including demolition, ground works, vegetation clearance) for each phase of development unless and until the Biodiversity Gain Plan (BGP) demonstrating that Biodiversity Net Gain will be achieved for each phase has been submitted to and approved in writing by the local planning authority. The BNG plan shall include the following:*

- *information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat,*
- *the pre-development biodiversity value of the onsite habitat,*
- *the post-development biodiversity value of the onsite habitat,*
- *As regards off-site provision it would also require any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development,*
- *any biodiversity credits purchased for the development, and*
- *such other matters than may be relevant.*

*Reason: To ensure the development achieves Biodiversity Net Gain*

**Economic Growth and Regeneration – 30 September 2022**

**Comments on application:**

**Introduction**

The comments that follow are based on our interpretation of the local economic benefits as outlined in the application and supporting documentation (in particular, Document 7 Leading Recovery and Growth and Document 13 Social and Economic Impact Report). They do not take into account any wider planning considerations.

**Fit with Local Strategy**

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.

Furthermore, the LIS 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. It also 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 coworking spaces. The proposed Centre Stage, incorporating an Education Hub managed by the NFTS and a Business Hub overseen by Buckinghamshire Business First, would help to support these aims.

The Buckinghamshire Economic Recovery Plan, produced by the Local Enterprise Partnership in 2020, outlines the actions needed to ensure businesses and residents across Buckinghamshire can adjust to changing economic circumstances associated with, and accelerated by, the Covid-19 pandemic. The Plan emphasises the ongoing, and increased, importance of the county's four key assets in driving recovery. Specific reference is made in the Plan to Pinewood, with support for a Global Growth Hub and new studio development on the site.

The Buckinghamshire Strategic Vision, produced by the Buckinghamshire Growth Board, sets out the ambition for a thriving, resilient and successful county. Specific reference is made to the role of Buckinghamshire's growth sectors in underpinning this and the aim to capitalise on existing specialisms and economic hubs, of which the creative sector and Pinewood is one. The Vision further highlights the importance of skills, local employment opportunities and flexible commercial space to support the growth of SMEs. Again, through the provision of skills and education; support for businesses and the creation of significant employment opportunities, this proposal will support the delivery of the Strategic Vision.

#### Economic Benefits

The supporting documentation clearly articulates the value of the film and television sector to the national, regional and local economy, particularly in relation to levels of employment and inward investment. It articulates the role that the proposal could play in supporting the ongoing growth of the sector, in addressing the shortfalls in studio space and addressing skills challenges.

#### Employment and Skills

It is estimated that through investment of approximately £800 million, the proposal will create 3,000 construction jobs, over 8,000 jobs (direct and indirect) once operational and will contribute £640 million to economic productivity (GVA) annually. It is particularly encouraging that a range of jobs will be created, with a focus on “sustainable and well-paid” employment. Further detail on the type of jobs to be created would be beneficial. This should also outline opportunities for Apprenticeships, Traineeships, work experience - all to have a focus on people of all ages.

To maximise the local economic impact of the scheme, we would encourage consideration to be given to efforts to ensure local residents can be assisted to secure the employment opportunities available. Links with the CITB (in the construction phase), DWP/Jobcentre Plus and Restart providers should be encouraged, alongside widespread and early promotion of activities within neighbouring areas.

The NFTS is a well-recognised and respected provider of tertiary and vocational education in the creative sector and this proposal affords an opportunity for them to build upon and enhance their existing curriculum offer in Buckinghamshire. The proposal for an Education Hub will see a range of courses offered, from craft skills training and production training, to residentials and CPD for those already employed in the sector.

As the Buckinghamshire Local Industrial Strategy highlighted at the time of its publication, the population aged 20-30 years in Buckinghamshire was 10% below the national average. In part, this can be attributed to the loss of young people to universities outside of the county, who on graduation, do not return to Buckinghamshire. As such, it is important that there are opportunities available to young people within the county, that they are aware of such opportunities, and that they have the support to access these. We therefore welcome the proposals for engagement with the Bucks Skills Hub and schools outreach, including careers talks, tours, and short courses.

Through such provision and engagement, the proposal will also support a number of the activities identified in the recent British Film Industry Skills Review, particularly around bridges from education to industry; industry led investment in training and more comprehensive careers information.

It is further proposed that the Education Hub offers adult education, training and retraining provision. Pinewood have experience of involvement in such schemes, for example through the Aviation to Film programme which supported those who lost jobs in the aviation sector to retrain to secure alternative employment in the film and television sector.

As the supporting information shows, unemployment levels remain above pre-pandemic levels, so ensuring residents have the skills needed to secure employment within growing sectors is important. Similarly, through the new Opportunity Bucks programme, the Council is prioritising the levelling up agenda and seeks to address disparities in opportunities through a focus on ten wards with the highest levels of deprivation. Jobs and careers and education and skills are two key themes of the programme, and again,

through the focus on skills development as well as the employment to be created, this proposal can contribute to the aims of Opportunity Bucks.

#### Enterprise

It is suggested that the Business Growth Hub will support the development of 50 new enterprises through a combination of pre-start up and start up support, incubation space, business accelerator programmes and film/media related space. As a county dominated by small and micro enterprises, it is important that support and provision is available. Bucks Business First have a strong track record of delivering assistance to Buckinghamshire's businesses, so their commitment to the Hub is encouraging. Opportunities for businesses both at the Hub and across the sector generally, to take advantage of procurement opportunities, to collaborate with each other, and to capitalise on the creative and digital clusters that exist across and close to the county, would be welcomed.

#### Impact on Town Centres and Placemaking Considerations

The proposed development will generate increased traffic movements across the local area and we will be looking to engage with colleagues in Transport to ensure the measures proposed to secure greater access by public transport and more active travel (through footway and cycleway improvements) are sufficient.

Our aim will be to ensure that the potential benefits to those town centres in close proximity to the development are not outweighed by the disadvantages resulting from increased traffic generation and any loss of green space. We are interested in exploring how connectivity between the site and the town centres can be enhanced, in a way that not only increases mobility but contributes to wider and longer term ambitions and regeneration strategies for these centres.

We would like to see consideration given to how employees at the studios be encouraged to play a more active and sustainable role in the local area, including supporting high street businesses. Also, how can we understand and capitalise on the needs and aspirations of those working in the film and TV sector to influence our approach to place making and vibrant town centres? With a specialist Regeneration team now in place within Economic Growth and Regeneration, we would request involvement in wider discussions around place making and connectivity.

#### **Summary and Recommendations**

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 Bucks Strategic Vision.

The proposal is of national significance and will be of significant benefit to the national, regional and local economies. This is particularly valuable as the economy continues to recover from the impact of the Covid19 pandemic and faces ongoing uncertainties.

The investment will support significant job creation, directly and indirectly, in both the construction and operational phases. Through building on existing educational and business networks, this proposal will offer support for new and growing enterprises and will support the skills of both those looking to enter, as well as those already working in the sector. This investment will cement Pinewood at the heart of the UK film industry and will contribute to the growth of the local economy. The Economic Growth and Regeneration Team therefore welcome and fully support this proposal.

### **Economic Growth and Regeneration – 19 December 2022**

#### **Comments on the “Economic Benefits: weighting in the planning balance” briefing note**

This note follows our earlier response on the application and relates solely to the briefing note “Economic Benefits: weighting in the planning balance” submitted by the applicant on December 13th 2022.

In our response of October 2022, the Economic Growth and Regeneration Team strongly articulated our support for the proposal, based on its fit with local economic strategy, the significant investment and employment benefits and the proposed approach to local skills development and support for new businesses. Our views remain unchanged and we continue to fully support the proposal.

As the economic benefits briefing note recently submitted clearly explains, since the proposal was submitted there has been a marked deterioration within the national economy. Even since the briefing note itself was written, there has been another increase in interest rates, likely to have a further detrimental effect on living standards and the cost of living crisis. The latest claimant count figures also show an increase in those claiming out of work benefits.

At the local level, the claimant count rate in Buckinghamshire remains lower than the national average (at 2.7% in November 2022, compared to 3.7% for England). However, between October and November 2022, there was a slight increase in the numbers claiming and this remains above pre-pandemic levels. Furthermore, when looking at the parliamentary constituency level, the claimant count in Wycombe, at 4%, is above the national average (*Buckinghamshire’s Claimant Count and Alternative Claimant Count, December 2022, Buckinghamshire Skills Hub, report*)

Similarly, the Quarter 2 Buckinghamshire Business Barometer survey (*Buckinghamshire LEP and BBF, October 2022, report*) found that 54% of responding businesses felt trading conditions were ‘worse than normal’, with a fall in sales and orders and significant increases in operating costs. 77% of responding businesses already have, or intend to increase, their prices, with fewer planning to invest in equipment and machinery and 10% reporting plans to reduce their headcount.

Given recent data and trends, the importance of schemes that create sustainable and well-paid employment opportunities is only heightened. The Creative Industries sector has been identified as one that can help drive recovery and growth, and opportunities for local residents and businesses to take advantage of this through skills development, employment, procurement and business support, need to be encouraged and maximised.

### **Summary and Recommendations**

To summarise, the Economic Growth and Regeneration Team wish to reiterate our support for the proposed development. We have seen over the last few months significant challenges within the UK economy and whilst the economic situation may be comparatively better in Buckinghamshire than in some other areas, now is not the time for complacency. We need to ensure that our residents have chances to develop their skills and to secure good quality, well-paid employment. And we need to ensure our businesses have opportunities to start and grow.

Whilst the Economic Growth and Regeneration Team would not wish to comment on the weighting to be applied to the economic benefits when considering the proposal, we would emphasise the extent and importance of such benefits, at both the local and national level. With the national economy as it is, and with pessimistic economic forecasts from organisations including the Office for Budgetary Responsibility, the importance of investment and growth within a priority economic sector should not be underestimated.

### **Environment Agency – 30 September 2022**

Thank you for consulting us on this application and I apologise for the delay in responding. We have now reviewed the information submitted and have no objection to the proposal if the following conditions are attached to the grant of any planning permission. Without these conditions we would object due to the risk to the environment.

#### **Condition 1**

No development shall take place until a scheme for the provision and management of an 8 metre wide buffer zone alongside the Alderbourne watercourse has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme/s (for example, native species suited to the conditions on site)
- details, including cross sections and designs of the wetland features to be constructed

- details demonstrating how the buffer zone and features within will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- details of any proposed footpaths, fencing, lighting, etc. Of particular importance is the proximity of the footpaths to the water course and the material used to construct them. The footpaths should be set back from the water course by 8m wherever possible and surfaced in a permeable material such as gravel. There should be no artificial lighting within 8m of the Alderbourne to maintain a dark river corridor.
- details and designs of the proposed foot bridge. The footbridge should be clear span design for minimal impact of the channel profile.

### **Reasons**

Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. Construction or excavation works within buffer zones can impact on protected species and habitats.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

The South Bucks Local Development Framework Core Strategy states that Rivers and waterways are crucial to the enhancement of local biodiversity as they provide natural corridors for biodiversity movement, and are an integral part of the Green Infrastructure assets of the District. It also states that rivers and waterways must be enhanced and restored in general, particularly when development can provide opportunities to renaturalise river corridors.

Networks of undeveloped buffer zones may help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Thames river basin management plan.

### **Condition 2 - landscape management plan**

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations



shall be agreed in writing by the local planning authority. The scheme shall include the following elements

- details of any new habitat to be created on-site. In particular, detailed designs of any wetland features or ponds that will be created including cross sections.
- details of treatment of site boundaries and/or buffers around water bodies
- Details of infrastructure such as footpaths, lighting, carparking etc.
- A detailed planting scheme
- details of management responsibilities over the longer term including adequate financial provision and named body responsible for management.
- Details of maintenance regimes

### **Reasons**

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and adopted policy 'Core Policy 9: Natural Environment' of the South Bucks Local Development Framework Core Strategy, Development Plan Document.

A management plan will ensure that a mosaic of habitat types suited to the location are created and ensure that the quality of the habitat created does not decline in the future due to a lack of effective management.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

### **Condition 3 - Legally protected species**

No development shall take place until a plan detailing the protection of Great Crested Newts and mitigation of damage to their associated habitat has been submitted to the local planning authority. The plan must consider the whole duration of the development, from the construction phase through to development completion. Any change to operational responsibilities, including management, shall be submitted to and approved in writing by the local planning authority. The Great Crested Newt protection plan shall be carried out in accordance with a timetable for implementation as approved.

### **Reasons**

To protect the Great Crested Newt and its habitat within the development site, and to avoid damaging the site's nature conservation value.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or

as a last resort compensated for, planning permission should be refused. Without this condition we would object to the proposal because it cannot be guaranteed that the development will not result in significant harm to Great Crested Newts and their habitat.

### **Advice on condition 3**

The Great Crested Newt is a protected species under the Wildlife & Countryside Act 1981 (as Amended) and The Conservation of Habitats and Species Regulations 2017 (Regs.) (The Conservation of Habitats and Species Regulations 2017 transposes into UK law the EU Habitats Directive Council Directive 92/43/EEC.) The submitted report (Great Crested Newt Survey Baseline (Interim) 2022) suggests that Great Crested Newts are active in the vicinity of the proposed Alderbourne Farm development. The applicant should employ a suitably qualified ecologist to work with them to develop Reasonable Avoidance Measures for the proposed work at Alderbourne Farm. 4 Examples could include (but should not be limited to):

- Ensuring that any vegetation clearance/removal of potential refugia is carried out during the least sensitive months and in a sensitive manner to avoid impact on GCN.
- Commitment to employ a suitably qualified ecologist to deliver 'tool box talks' on Great Crested Newts to operators onsite prior to any works commencing.
- Employing an Ecological Clerk of Works to be present when vegetation clearance, or the clearance of potential refugia is carried out or when any earth works are being undertaken.
- Addition of hibernacula material if existing material must be lost
- Draining down any standing water during the winter months outside the GCN breeding season. If a pump must be used, use at low speed and cover the intake pipe with fine mesh.

We would also like to see the eDNA GCN survey results for ponds 5 and 9 which couldn't be undertaken in May 2022.

### **Condition 4 – Foundation works risk assessment**

Prior to development a foundation works risk assessment will be agreed with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

#### **Reason**

The site is located on top of a landfill protected with a geological barrier. This barrier must be protected to ensure there is no harm to groundwater resources in line with paragraph 183 of the National Planning Policy Framework

### **Condition 5 – no infiltration**

No drainage systems for the infiltration of surface water to the ground are permitted on areas above landfill. The development shall be carried out in accordance with the approved details.

## **Reasons**

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 170 of the National Planning Policy Framework.

## **Advice on condition 5**

The proposed SuDS and swales to the perimeter of the Pinewood South development must be impermeable, lined and sealed. Any collected infiltration must be discharged off site.

## **Regulatory waste advice for applicant**

We have the following advice for the applicant in regards to the regulated Landfill on site:

1. Highways Plans show northern entrance to Pinewood South directly on top of Monitoring boreholes GWM01 and GWM10 and the southern access would also destroy GWM07. All these locations are critical to the monitoring and assessment of the risks posed by these landfills. We would encourage these locations to be reconsidered and moved by a couple of metres to preserve these installations. If they are not preserved, they would need to be relocated in line with the requirements of the environmental permit before any work could proceed in establishing new access points, potentially delaying the development. Once replaced, all impacted boreholes must be fully decommissioned to ensure they do not leave pathways for contamination to enter the groundwater. This change to monitoring points may also delay any surrender of the landfill permits as we would no longer have consistent data at fixed locations to demonstrate stable conditions and that the environment has not been impacted.
2. The proposal fails to recognise that although the active operations in the landfill have ceased, this activity (and waste) remains present at the site and there is ongoing processes, reactions, maintenance and monitoring required for this regulated landfill. This can be managed in a way that is compatible with the proposed development, if the development recognises the continuing presence of the waste on the site and incorporates this and its infrastructure into the proposed design.

As the site develops, the exact location of structures is a concern and buildings should be sighted to avoid the geological barriers and landfill monitoring boreholes. This has not been considered in the design and access statement or as part of the landscape and Ecological Design or within PP4. Some proposals for the layout may not be practical given the limitation of the current below ground uses.

3. Drainage systems and services must be designed and located to minimise penetrating the geological barrier.

4. It is unclear what excavation of controlled waste will be required. We remind the applicant that any excavated waste from within the landfill remains a controlled waste even if the applicant has a use for it. It must either be recovered under the correct authorisation (Environmental Permit) or disposed at an appropriate facility. Proposals to create bunds and raised platforms using imported or excavated inert waste soils would not be permitted as this would contravene the existing Environmental Permit held at the site.

### **Informative- Requirement for an environmental permit**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) • on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure
- (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Please note for works impacting the river Alderbourne any permit will require a protected species survey. Of particular relevance in this case is water vole, which may be present at this location. Any works impacting natural bank within 5m of top of bank could impact water vole and their habitat.

Although this application will most likely not qualify for a FRAP the Environment Agency would like to be notified of the commencement of work and the duration of works as there is annual essential maintenance which will need to be undertaken and appropriate access will be needed.

### **Asset liability**

The Environment Agency would like to remind the applicant that, in the absence of an alternative agreement or special transference of liability or contract, the owner of the asset remains responsible for the asset. The risk remains with the asset owner and this response does not remove any of this liability from the owner or contractually responsible party.

### **Riparian responsibilities**

As Alderbourne runs within the red line boundary, it is likely that you own a stretch of watercourse. This means you have riparian responsibilities. Responsibilities include (but are not limited to) the maintenance of the river at this location including the riverbank. Further information on this can be found here: <https://www.gov.uk/guidance/owning-a-watercourse>

### **Water Resources**

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.

### **Environment Agency – 23 November 2022**

Following the information submitted to allay the concerns of your response of your Newt officer's objection we are now in a position to remove the need for our third condition which requested a plan detailing the protection of Great Crested Newts.

We still require the first 2 conditions we requested.

### **Environment Agency – 23 December 2022**

Thank you for consulting us on the amended plans. We have reviewed the information submitted and concluded this does not change our earlier response and we continue to request the following four conditions.

#### **Condition 1**

No development shall take place until a scheme for the provision and management of an 8 metre wide buffer zone alongside the Alderbourne watercourse has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be

carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme/s (for example, native species suited to the conditions on site)
- details, including cross sections and designs of the wetland features to be constructed
- details demonstrating how the buffer zone and features within will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- details of any proposed footpaths, fencing, lighting, etc. Of particular importance is the proximity of the footpaths to the water course and the material used to construct them. The footpaths should be set back from the water course by 8m wherever possible and surfaced in a permeable material such as gravel. There should be no artificial lighting within 8m of the Alderbourne to maintain a dark river corridor.
- details and designs of the proposed foot bridge. The footbridge should be clear span design for minimal impact of the channel profile.

### **Reasons**

Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. Construction or excavation works within buffer zones can impact on protected species and habitats.

This approach is supported by paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

The South Bucks Local Development Framework Core Strategy states that Rivers and waterways are crucial to the enhancement of local biodiversity as they provide natural corridors for biodiversity movement, and are an integral part of the Green Infrastructure assets of the District. It also states that rivers and waterways must be enhanced and restored in general, particularly when development can provide opportunities to renaturalise river corridors.

Networks of undeveloped buffer zones may help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Thames river basin management plan.

### **Condition 2 - landscape management plan**

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority. The scheme shall include the following elements

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- Details of infrastructure such as footpaths, lighting, carparking etc.
- A detailed planting scheme
- details of management responsibilities over the longer term including adequate financial provision and named body responsible for management.
- Details of maintenance regimes

### **Reasons**

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and adopted policy 'Core Policy 9: Natural Environment' of the South Bucks Local Development Framework Core Strategy ,Development Plan Document.

A management plan will ensure that a mosaic of habitat types suited to the location are created and ensure that the quality of the habitat created does not decline in the future due to a lack of effective management.

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### **Reason**

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**Condition 4 – no infiltration**

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**Reasons**

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landscape and Ecological Design or within PP4. Some proposals for the layout may not be practical given the limitation of the current below ground uses.

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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.

#### **Environment Health – 5 September 2022**

I have reviewed the relevant chapters of the Environmental Statement. Ground conditions and contamination is one of the environmental technical topics that have been scoped out.

#### **Part A – Alderbourne Farm**

Historical mapping shows that Alderbourne Farm was present in the 1920s, the rest of the proposed development site appears to have been fields, likely agricultural in use, inferred by field boundaries depicted on the map for this period, there is a wooded area labelled Brown's Wood in the east of the site, not a great deal of change is shown on the subsequent maps.

There is an area in the south west of the site that has been subject to quarrying .

There is an area of historic landfill on the eastern boundary (hld\_ref EAHLD12504, site\_name Field end farm, site\_name Seven Hills Road, Iver, wrc\_ref 0400/0092, site\_ref WDA/234, 1094/13, lic\_hold Mayling Skip Hire, lic\_issue 02/06/1986, lic\_surren 19/02/1993, firstinput 30/06/1986, lastinput 30/06/1989, inert).

There is another area of historic landfill within the Pinewood site (Sauls Farm).

The section in Volume 2 of the ES that relates to Alderbourne Farm concludes as follows:

“The geoenvironmental preliminary risk assessment undertaken for the Alderbourne Farm indicates a low risk as the site is generally greenfield, but a moderate risk associated with infilled land and potential for buried waste/cars, and the migration of potential contaminants from off-site particularly associated with the former landfill to the south east. The results of the assessment indicate that, subject to the findings of the proposed investigations, there is low likelihood remediation associated with on site sources will be required due to the greenfield nature of the site, however, due to its close proximity to a former landfill and the potential for buried cars/parts, some development phase remediation such as removal of buried cars, provision of capping layers and implementation of a watching brief and discovery strategy may be required. A technical note detailing how unexpected contamination, if encountered, will be dealt with will be issued under separate cover”.

#### **Part B - Pinewood South**

The historical maps indicate that the site may have had an agricultural use, inferred by the presence of field boundaries on the map for the 1869-1888 epoch, Park Lodge, a rectory and Grace Villa are shown within the site boundary, an old gravel pit is shown adjacent to the site during the 1898-1899 epoch, the site is shown as being divided by various lines on the map for the 1955-1974 epoch, further residential properties are shown on the periphery, a council depot and the five points roundabout are also shown.

There is an area of historic landfill in the north of the site (hld\_ref EAHLD35923, site\_name Park Lodge Farm, site\_add Pinewood Road, Iver Heath, lic\_hold Brett Aggregates Ltd, lic\_issue 31/07/2000, firstinput 24/04/2002, no further details held).

There is an area of authorised landfill in the south of the site, it is understood that the site accepts inert waste.

The section in Volume 2 of the ES that relates to Pinewood South concludes as follows:

“From the preliminary intrusive investigation undertaken, elevated concentrations of contaminants have not been recorded above the generic assessment criteria for a commercial end use. Low levels of asbestos (below the hazardous waste threshold of 0.1%) were detected in three samples between 1.5m and 3.6m bgl. The geoenvironmental 14 preliminary risk assessment undertaken for the site indicates a general low to moderate risk at Pinewood South. 91. Whilst the investigations and assessments may identify that some remediation may be required to support the development of Pinewood South, based on the site history it is anticipated that this is likely to comprise of typical remediation

requirements for the redevelopment of brownfield sites such as ground gas protection measures and the installation of capping layers”.

The geoenvironmental preliminary risk assessment and the preliminary intrusive investigation do not appear to have been submitted.

Based on this, the following contaminated land condition is recommended on this and **any subsequent applications** for the site.

**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 preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

ii) A site investigation, based on (i) 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.

iii) The site investigation results and the detailed risk assessment (ii) 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.

iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (iii) 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

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that

demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

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

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>.

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 1, 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 in accordance with condition 1.

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.

### **Forestry Commission – 1 September 2022**

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<sup>1</sup> and a suitable compensation strategy exists”* (National Planning Policy Framework paragraph 180).

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
- changing the woodland ecosystem by removing the woodland edge or thinning trees  
- causing greater wind damage and soil loss

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 adjacent to or impacting the Public Forest Estate (PFE):**

Please note that the application has been made in relation to land near 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), including for forest roads, please contact us.

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.

### **Forestry England – 8 September 2022**

Forestry England do not manage any land near to this application, was the application intended for the Forestry Commission (the forestry regulator), who have a statutory responsibility to comment on planning applications involving ancient woodland? If so, please resend the consultation to [nationalenquiries@forestrycommission.gov.uk](mailto:nationalenquiries@forestrycommission.gov.uk)

### **Heritage (Historic Buildings) – 9 September 2022**

<b>Heritage Assets</b>
Alderbourne Farm (Site A) <ul style="list-style-type: none"><li>– Non designated heritage assets; a number of the existing buildings on the site need to be considered under the current Historic England criteria</li></ul>
Land South of Pinewood Studios (site B) <ul style="list-style-type: none"><li>– Listed Buildings (LB), which are designated heritage assets; adjacent the site is Heatherden Hall and Little Coppice, both Grade II Listed. Nearby is the Church of St Margaret which is also Grade II Listed</li><li>– Registered Park and Garden (RPG), which is a designated heritage asset; near the site is Langley Park a GII RPG</li></ul>

<b>Relevant Planning History</b>
PL/20/3280/OA - 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 - Green Infrastructure (APPROVED)</li></ul>

## Discussion

The heritage assessment is the impact on the setting of the listed buildings and the registered park and garden. And if considered as such, the impact on the non-designated heritage assets and their setting.

### SIGNIFICANCE

- SITE A

Alderbourne Farm (site A) is a collection of typical farm buildings, including agricultural barns of varying forms, scale and materials albeit mostly modern. Along with a small brick cottage and timber dovecote (possible NDHA).

The 1875 OS Maps shows a traditional farmyard arrangement with two linear building forming a yard area (no longer in situ) and forward of this a rectilinear plan form building with small ancillary buildings around, this building is believed to be the existing farm cottage. Later map phasing indicates additional farm buildings have appeared and later removed, which is common due to changes in farming practice.

In the absence of a formally adopted Local List the council's fall back is to assess buildings in line with the Historic England criteria (HEAN7). Regrettably the submitted heritage statement has confirmed it only referred to the Council's online resources. As the site is not within a conservation area and the Council are currently at the early stages of its Local List (therefore not adopted) there are no online resources for NDHA's.

Currently the cottage has boarded windows and therefore many of the features to identify the significance were not possible during the site visit.

- SITE B

The area south of Pinewood Studios (site B) is an area of open landscape containing no built development or heritage assets (HA). However, there are a number of HA's within the vicinity.

- Heatherden Hall (GII)

Heartherden 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 B, 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 loose and Italianate composition with formal and polite stuccoed and painted brick with 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 structure 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 value, historic value, aesthetic value, social and communal value and through its rarity.

– Little Coppice

Little Coppice is a Grade II Listed Building which lies c.100m east of the development site B. 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 crats 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 buildings 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 buildings prominence makes it a local landmark and a visual receptor from the parkland. The buildings 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.

– St Margaret's Church (GII)

The Grade II Listed Church lies c. 350m south-east of the development site B. The building dates back to 1860 again by local named architect Charles Frederick Reeks. The building is characterised by its flint with stone dressings, north transept and tower on south-east side of nave. Tower with battlements and traceries 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 value, historic value, aesthetic value, communal value and rarity.

– Langley Park (GII) and Associated Listed Buildings (GII)

The grade II park and garden lies to the south side of Uxbridge Road c.250m south-west of the development site B. 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 C19th 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**

Site A, a former farm north of the existing Pinewood Studios is an entirely new scheme, to include a space for an open air filming backlot and supporting buildings to complement the existing studio facilities. The development would include areas of parking and serving, with access from Seven Hills Road.

To the north of this, the remaining area of the site is to become a nature reserve to be used as a recreational function. As a new facility it would deliver a biodiversity gain and ensuring a longer term protection of the existing arrears of the ancient woodland.

Site B, the land south of the existing Pinewood Studios has extant outline permission for a growth hub, to include a visitor attraction, film production buildings, education and business hub along with the required surface level parking and landscaping for up to 750,000 sq ft (70,000 sq m).

The current proposal similarly seeks outline permission of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure, however, the current application seeks to increase this to 1,365,000sqft (126,817sqm).

## **SITE CONTEXT**

Site A is located to the north of the existing Pinewood Studios and extends to 35ha (87acres) and currently consists of areas of farmland, agricultural buildings along with the farm cottage and mature woodland. Predominantly used as agricultural grassland until the farming operations ceased in 2019.

To the north the site is bounded by Orcahrd Cottage, a large residential property with associated grounds containing a number of mature trees which abuts Hawks Wood to the north east. To the east the site aligns with the M25 and M40 intersection slip road and planted embankment. The south is bounded by Sevenhills Road, currently a single carriageway B road although with existing consent to re-align and upgrade. Along the westerly boundary is Alderbourne Lane with a native hedge of circa 2.5 metres in height with a number of mature and semi-mature oak trees lining the road.

The Alderbourne River bisects the site in an east-west direction, forming a natural valley. The site slopes down towards the Alderbourne River to the north, with a series of farm yard areas terracing the valley and a fall of approximately 30m across the 0.4km. North of the river, the site slopes upwards with a change of 14m across the 0.3km.

Development site B extends to 32ha (77acres) and 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 now 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.

### **HERITAGE IMPACT**

Site A will retain the existing access from Seven Hills Road, albeit with a widened entrance. In heritage terms there are no objection to this point of access.

Whilst it is acknowledged the current masterplan is indicative only at this stage (except for principal points of access) the scheme includes the demolition of all existing building within the site. As discussed above the majority of these are modern and therefore no objection in heritage terms regarding their loss.

However as also discussed above the farm cottage appears in mid to late 19th century maps, and therefore would require further assessment prior to any decision as to its demolition. In addition, the dovecote appears an interesting feature within the site. It was discussed on site that this could be more easily relocated within the site rather than it be lost in its entirety.

The site B masterplan includes two points of access off the Pinewood Road and a third access off Uxbridge Road. As these are in line with the previously approved scheme, the access arrangement remains acceptable in heritage terms.

Whilst it is acknowledged the masterplan is indicative at this stage only, the current application represents a considerably intensified expanse of additional built development. This will include replacing the surface level parking within the southern section of the site and area towards the north, along Pinewood Road. Parking instead would be provided by multi-storey car parks, two along the Pinewood Road and a third when entering the site from Uxbridge Road. Therefore further assessment is required on the setting of the identified heritage assets;

- Langley Park (GII RPG) and Church of St Margaret (GII LB)

In response to the previously approved application the heritage response concluded due to the degree of separation and distance between site B and these heritage assets, they would not be affected by the proposed development.

Whilst the revised scheme does intensify the extent of built development the maximum height levels of the indicative buildings has not increased. Thereby, not impacting shared or long views which may include the development or HA together. Therefore, the opinion remains there would be no impact to these HA's from the revised scheme.

- Little Coppice

The heritage response for the previous scheme raised concerns of the impact of the development on the setting of this listed building. It highlighted that Little Coppice has a

strong visual presence from Pinewood Road and from across the development site from key vantage points along the public right of way within Black Park. Whilst the latter point was disputed by the agents in their own additional comments (Response to consultation submission by Buckinghamshire Heritage officer, December 2020) it was agreed the viewpoint from Pinewood Road of The Coppice was more significant. The agent's comments regarding the impact from the bunding of the quarry considered irrelevant as these were only ever to be temporary as per the quarry use of the site.

Therefore, to reiterate development such as that proposed in site B, especially the intensification of built development along Pinewood Road would have some impact on the views from, towards, through across and including this listed building. The surrounding landscape and any intentional intervisibility with other historic and natural features, such as Black Park also contributes to the setting of heritage assets. Which in the case of Little Coppice would be negatively impacted by the proposed development in site B.

– Heatherden Hall (GII LB)

The immediate setting of this listed building has been somewhat altered due to the expansion of the studios, particularly to the north. However, an area of formal garden has been retained between the listed building and site B to the south. In the response to the previous application heritage concerns were raised that the existing plant screening did not provide sufficient visual separation. A concern somewhat mitigated by the proposed surface level parking in the north east corner of the site.

However, in the current indicative masterplan this corner would be occupied by a multi-storey car park. Similarly, to Little Coppice this raises concern regarding the impact on the views from, towards, through across and including this listed building. The surrounding landscape and any intentional intervisibility with other historic and natural features, such as Black Park also contributes to the setting of heritage assets.

Summary;

Subject to the current application being approved, further consideration of additional built development along the Pinewood Road would be required to minimise the impact on the setting of these heritage assets. Whilst it is acknowledged the masterplans are indicative at this stage, the extent of additional built development proposed under this outline application would ultimately require more intensive development along the Pinewood Road. For reasons discussed above, this would have a negative impact on the identified heritage assets and therefore would not preserve their architectural and historic interest.

**Heritage Policy Assessment**

**The Planning (Listed Building and Conservation Areas) Act 1990**

The proposals due to the extent of built development within site B would not preserve the architectural and historic interest of the listed buildings and therefore does not comply with sections 66 of the Act.

**NPPF**

The proposal due to the extent of built development within site B would cause less than substantial harm to the significance of the designated heritage asset. Paragraph 202 therefore 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 195 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 200: *‘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’.*

Due to the lack of assessment of the farm cottage and dovecote (site A), there is insufficient (heritage) information to determine the application and therefore the submission does not comply with paragraph 194 of the NPPF. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

### **Conclusion**

For the reasons given above it is felt that in heritage terms: That the application does not comply with the relevant heritage policy and therefore unless there are sufficient planning reasons, it should be refused for this reason.

## **Heritage – 7 November 2022**

### **Summary**

The additional heritage assessment for the existing buildings within Alderbourne Farm is welcomed and considered sufficient. It is agreed that the existing buildings are not considered to be non-designated heritage assets (NDHA).

### **Heritage Assets**

Alderbourne Farm (Site A)

- The existing buildings of Alderbourne Farm have been assessed and are not considered to be nondesignated heritage assets.

Land South of Pinewood Studios (site B)

- Listed Buildings (LB), which are designated heritage assets; adjacent the site is Heatherden Hall and Little Coppice, both Grade II Listed. Nearby is the Church of St Margaret which is also Grade II Listed
- Registered Park and Garden (RPG), which is a designated heritage asset; near the site is Langley Park a GII RPG

### Relevant Planning History

**PL/20/3280/OA** - 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:

- 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)
- Education and business hub (50,000 sq ft)
- Associated parking and servicing
- Green Infrastructure

(APPROVED)

### Discussion

The following should be read in conjunction with the initial heritage comments made on the 9th September 2022. These earlier comments requested an assessment be made of the existing buildings within Alderbourne Farm which has now been submitted as '*Heritage Statement: Addendum: Alderbourne Farm - October 2022*'.

#### Alderbourne Farm (Site A)

- Farmhouse

During the site visit (31st August) the existing farmhouse was screened off with Harris fencing and boarded windows, therefore a thorough assessment was not possible at that time. Although it was noted to be of a similar position and form as a building indicated in the 1875 OS Maps.

The updated Heritage Statement has accessed the relevant local authority archives to find a 1958 sales particulars photograph (figure 3.8) of the Alderbourne Farmhouse which is now believed to have been the building in the earlier maps. It is agreed that the most likely outcome was this farmhouse was demolished or significantly altered to allow for the building seen on site now.

Furthermore, whilst the internal features of a NDHA cannot form part of a planning consideration, in this instance modern construction timbers and materials confirm this as a more recent building.

Therefore, it is agreed the existing farmhouse is not considered a non-designated heritage asset.

- Dovecote/Bird House

Whilst this was not identified on any historical maps, it was noted during the visit to be an interesting structure and further assessment requested. The Heritage Statement has confirmed this is of modern construction and a relatively plain garden building.

It is agreed this is not a non-designated heritage asset.

- Farmstead

As stated in the previous heritage comments the majority of remaining farm buildings are of modern construction. The additional Heritage Statement has identified that some of these buildings have remnants of older fabric and may be in similar positions within the site. Essentially small sections repurposed but significantly altered.

As a whole, whilst the farmstead and its transitional development is of some interest, the buildings which remain are not considered to be non-designated heritage assets.

Land South of Pinewood Studios (side B)

No additional or revised information has been submitted for site B and therefore please refer to initial heritage comments dated 9th September 2022

**Heritage Policy Assessment**

Please refer to initial heritage comments dated 9th September 2022 however paragraph 194 of the NPPF is no longer relevant as there is no objection on grounds of insufficient information.

However, the proposal remains unchanged at this stage for site B which due to the extent of built development within this area would cause less than substantial harm to the significance of the designated heritage asset. Paragraph 202 therefore still applies.

**Conclusion**

For the reasons given above it is felt that in heritage terms:

Please refer to initial heritage comments dated 9th September 2022

**Historic England – 25 August 2022**

Thank you for your letter of 10 August 2022 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at

<https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

#### **Historic England – 6 September 2022**

Thank you for your letter of 25 August 2022 regarding further information on the above application for planning permission.

On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

#### **Historic England – 12 January 2023**

Thank you for your letter of 23 December 2022 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

#### **Planning – Royal Borough of Windsor and Maidenhead – 9 December 2022**

Thank you for your consultation that was received on 10 August 2022.

I write to inform you that the Royal Borough of Windsor and Maidenhead has no objection to the above proposal.

#### **Planning – Royal Borough of Windsor and Maidenhead – 17 January 2023**

Thank you for your consultation that was received on 21 December 2022.

I write to inform you that the Royal Borough of Windsor and Maidenhead has no objection to the above proposal.

#### **Buckinghamshire Highway- 10 January 2023**



Thank you for your consultation letter with regard to the above planning application. The proposed scheme is an alternative to the Screen Hub UK (SHUK) scheme that was permitted by Buckinghamshire

Council in April 2022. It is on the same footprint albeit covers a larger area that SHUK and includes

Alderbourne farm. The application documents present this as an effective variation of the existing permission. It must however be stressed that this is a new application, and must be assessed and mitigated based on its own impacts and not on any previous permission that exists. The permitted SHUK scheme promoted a modest level of film production space, an education hub, business development space and a dominant feature of that application was a visitor attraction that was presented of being of national importance. The scheme before us is fundamentally different in nature being as it is nearly entirely film production with the business hub and education elements retained as minor elements within the application.

The TA sets out the requirements of the National Planning Policy Framework, in relation to determining applications in Highway Terms.

Paragraph 110 and 111 of the National Planning Policy Framework sets out the following tests when considering the traffic impacts of a planning application; Para 110. In assessing sites that may be allocated for development in plans or specific applications for development, it should be ensured that: a) Appropriate opportunities to promote sustainable transport modes 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. c) The design of streets, parking areas, other transport elements and the content of associated design standards reflects current national guidance, including the National Design Guide and the National Model Design Code, and d) Any significant impacts from the development 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.

Para 111. 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.

The Highway Authority has tested this application against these criteria and come to its recommendation in the light of these tests. T

he location of the development within Iver is remote from a significant centre of population and not easily accessible via public transport, with limited bus services in the vicinity and the rail/tube stations being beyond an acceptable walking distance. The development location therefore lends itself to the dominant mode of travel being the private car.

The TA sets out in section 1.2 the development background, this summarises the applications known as PSDF (13/00157/OUT) and SHUK (PL/20/3280/OA) and seeks to set out the highway works and s106 agreements within these two applications. It is notable that the PSDF application carried with it an obligation to deliver a traffic signals scheme at Five

Points Roundabout (FPR) which has not yet been delivered. In 2019 an application for an alternative mitigation, Sevenhills Road (SHR) (PL/19/4430/FA) improvement was received and subsequently approved as a variation to the PSDF s106 agreement. On granting of permission Pinewood Studios served notice on the Council that they would implement the FPR scheme to fulfil the obligation of PSDF mitigation. There is currently a planning application with the council for this scheme (PL/21/4074/FA).

The SHR scheme was supported by a Transport Assessment carried out by iTransport, that sought to demonstrate that 30% of the traffic generated by Pinewood Studios was reaching the Strategic Road network at the M40 Junction 1, Denham interchange. It was found that the scheme was an acceptable alternative to FPR to mitigate the impacts of PSDF by reducing the traffic pressure on FPR by the removal of that proportion of traffic and redirecting it away from Pinewood Studios via SHR and onward to the M40.

The SHUK application, (PL/20/3280/OA) used the same assessment criteria and network within its assessment. The visitor attraction would be accessed by persons from all over the country reaching the site from the Strategic Road Network, of which the closest location available is the M40 Junction 1. The nature of a visitor attraction promoted a significant proportion of visitors via coaches throughout the day which limited the impacts of peak hour traffic.

This application is fundamentally different from those previous applications and therefore it is necessary to assess it as such. This is a new application that seeks to develop large scale filming and production facility on the land, which will employ large numbers of people from surrounding residential areas, namely, Slough, Uxbridge and Hillingdon, Gerrards Cross, Beaconsfield and the surrounding small towns and villages within South Buckinghamshire and across London. This is a dispersed resident workforce that will approach the site from all directions. The number of employees at the site is also to be significantly different from that of the visitor attraction, and this will be borne out within the trip generation of the site, that will be significantly different in volumes and pattern from the previous application.

As a result, this application cannot be considered to be similar in transport terms to the SHUK application, rather if it has parallels with previous applications it can only be considered similar with the PSDF application and should be assessed in a similar manner to that application.

The applicant has carried out their transport assessment on a first principles approach over the assessed network and submitted the results of local junction modelling, which was the methodology used with the SHUK application. In review of this technical information the Highway Authority determined that the information provided allowed appropriate assessment of the network and a determination of the impacts.

To have confidence in the results of this methodology the Highway Authority has undertaken further review of additional evidence to determine the baseline traffic for the highway network. Future developments by this applicant should expect to use the Iver Strategic Model as the most comprehensive method of assessment, preventing the need for manual assessment of junctions outside the assessed area.

The application has used survey data from March 2022, which was of concern to the Highway Authority given the closeness to the ending of COVID-19 restrictions. In order to address the concerns further information and evidence was required to show that the data provided was representative of true highway conditions and supported across both the local and strategic networks. The Highway Authority has been able to corroborate this information with data gathered by the Council. Sensitivity testing has also been undertaken and supplied to the Highway Authority testing the network under conditions of higher demand and background traffic levels for greater certainty of the networks ability to accommodate the development traffic.

#### Trip Rates

The trip rates supplied within this application are based on employee turnstile survey data from March 2022, the results of this survey show a significantly lower trip rate than that used and accepted within the SHUK application. These new trip rates are also lower than had been used within the PSDF application. These differences in the trip rates are explained by the development of PSDF which meant that a similar number of individuals would be working across the larger area leading to less overcrowding. The lower trip rates than SHUK have been evidenced as a result of proportions of the employee base now being able to work remotely for some of the week. And the provision of comparative rates to other film production sites show that these lower rates are not dissimilar to other sites. The new trip rates have been fully explained by the applicant and are considered appropriate to apply to the new development.

The accepted base trip rates (the assessment made prior to any sensitivity testing) are as follows;

**Table 10.11: Proposed Scheme Traffic Generation (AM Peaks)**

	AM Peak Hour 1 (0700 – 0800)			AM Peak Hour 2 (0715 – 0815)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	6	0	6	20	1	21
Business growth hub	13	2	15	26	2	28
Pinewood South Production Space	619	57	676	486	71	557
Alderbourne Farm Production Space	16	1	17	12	2	14
<b>Total</b>	<b>654</b>	<b>60</b>	<b>714</b>	<b>544</b>	<b>76</b>	<b>620</b>

Source: Tables 10.1, 10.3, 10.7 and 10.9.

**Table 10.12: Proposed Scheme Traffic Generation (PM Peaks)**

	PM Peak Hour 1 (1715 – 1815)			PM Peak Hour 2 (1730 – 1830)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	11	16	27	13	14	27
Business growth hub	4	55	59	3	43	46
Pinewood South Production Space	56	481	537	50	498	548
Alderbourne Farm Production Space	1	12	13	1	13	14
<b>Total</b>	<b>72</b>	<b>564</b>	<b>636</b>	<b>67</b>	<b>568</b>	<b>635</b>

Source: Tables 10.1, 10.3, 10.7 and 10.9.

Sensitivity testing has been carried out using these rates as a basis and then uplifting them to ensure that further assessment at a greater level of robustness has been considered.

The existing Sustainability of the site

As previously mentioned the site is not easily accessible via sustainable modes, and has therefore secured travel planning measures in previous applications, including shuttle buses and requirements for cycleway infrastructure. The lack of sustainable travel options was also acknowledged within the Planning Inspectorates report and the Secretary of States findings regarding the 2013 application for the PSDF expansion.

The cycle and pedestrian options within Iver Parish are not complete and do not provide year-round or all weathers suitable provision for use as commuting routes. The current footway/cycleway on Pinewood Road is present but ceases at FPR, it has been the expectation to use developer funding to connect this with National Cycle Route (NCR) 61.

Delivery of pedestrian and cycle improvements are being actively pursued by the Transport Strategy team within the Council at the present time. NCR 61 runs east west through the parish of Iver, 1.6km south of the site and provides connectivity between Slough and

Uxbridge. However current guidance states that cycling may provide a viable alternative for short journeys of up to 5km. This distance would reach the centre of Uxbridge or the northern edge of Slough, via the A4007 and the A412 respectively. The A412 Uxbridge Road is a high-speed dual carriageway, which is unsuitable for cycling. NCR61 would represent a significant southerly diversion from the centre of Uxbridge to reach the site and uses unlit routes including the bridge over the M25 at Palmers Moor Lane and Love Green Lane

The A4007 Slough Road has no cycle provision on it and there is no current cycle provision to either Iver or Langley stations. Whilst there have been improvements to the provision in the area as a result of PSDF and other measures that were secured under SHUK, these do not yet represent a connected comprehensive network of sustainable travel options.

The Public Rights of Way (PROW) network in the Iver area provides connections between parts of the parish. However, these are principally recreational routes at the present time. The PROW network is important and should be improved and supported, though without significant improvements to make the surfaces suitable for all weather use by pedestrians and cyclists it does not constitute a network that should be considered part of the provision of the access the development.

Considering the Public Transport provision in the area, there is very limited access to the site by commercial bus route 3. The nearest stop is found east of FPR 500m from the closest corner of the site, well in excess of the current maximum recommended distance of 250m. The true distance to this stop is greater than this, as the development itself is 800m in length. The services do not provide a comprehensive timetable. To mitigate this previously Pinewood have provided private shuttle bus connections to local rail and underground stations. The shuttle bus service provides private connection to rail stations radially notably with the exception of Iver and Langley station.

#### Introduction to local highway network

The local highway network is known to be significantly congested, with particular issues known to be present on the A412 Church Road, FPR and the junctions between Thornbridge Road and Bangors Road North. There are also significant issues on the double mini roundabout at Bangors Road North/Bangors Road South/Slough Road. Sevenhills Road currently remains a link of poor quality with a section that is a single track road without passing places at its western end. FPR has also known to experience congestion issues hence the requirement for signalisation. The junction of SHR with the A412 Denham Road is known to perform poorly, with long delays to exit and turn right into Sevenhills Road representing a safety concern when these movements are performed during peak traffic conditions, and the SHR planning application demonstrated this.

The congestion and characteristics of the local highway network causes the local highway network to be a threatening and unwelcoming environment for walking and cycling, as identified within the Iver Neighbourhood Plan, which seeks to address this through ambitions to provide extensive improvements to the sustainable infrastructure.

It is therefore necessary that this application makes its own independent proposals for mitigation based on the trip generation and activity that this application will introduce.

Further comments shall be made regarding this matter later in this response when considering the Travel Plan and the proposals presented, and appropriate obligations within the s106 table at the end of this response.

#### Road Safety Assessment

The road safety analysis shows that the highway network does not have any pattern of collisions due to highway design. The applicants do acknowledge local concern at the junction of Black Park Road with the A412, and the way in which the Highway Authority has implemented a safety improvement addressing turning movements (removing right turns out of Black Park Road and modifying the ability to make U turns) at that junction in 2019. This reflects the improvement that has been seen within the recorded accident statistics. It is noted that the applicants propose a contribution of £25,000 towards safety improvements at this junction. This contribution is accepted as the development will see an increase in traffic in the area, and the presence of a new left in left out access point on the A412 close to this junction. The applicants haven't given a specific proposal that the Highway Authority would seek to progress at this time. Road Safety colleagues are supportive of the contribution, that should be secured for mitigation that can be implemented on the A412 in support of the existing safety scheme.

#### Local Highway Network Assessment

As has been previously noted the highway network that has been assessed within this application is the same as that which has been used for the SHR and SHUK applications. It has been previously outlined within this response as to why those assessments have been accepted.

The network assessed has been identified using Automatic Number Plate Recognition (ANPR) survey data which identifies ~30% of Pinewoods existing traffic travels (tables 7.1 and 7.2 of the SHR application TA) to reach the M40 and onward to the M25 and wider network. With the introduction of the SHR scheme that traffic would be expected to reallocate away from the rest of the network.

The remaining traffic disperses over the network to the south and east of FPR and out of the Buckinghamshire network into the neighbouring areas. The Highway Authority initially had concerns with the cordon area used for the assessment and that it was not large enough. In response to this concern further work has been carried out to identify the potential volumes of traffic that could reach the wider network through the sensitivity testing, and the Highway Authority is content that the junctions beyond the assessed network would be impacted by low enough numbers of vehicles not to be a change in volumes that would require assessment or mitigation.

The peak hours used within the assessment are acceptable, and the premise of the overlapping assessment hours is continued from previous applications. This ensures that both the development peak hour traffic and the network peak hours are assessed fully.

#### Operational Assessments of junctions.

The baseline presented a less congested network than that presented for the SHUK application, with FPR, Pinewood Road/Pinewood Green and the SHR/A412 Denham Road

junction now being presented as currently operating within theoretical capacity due to the use of a new set survey data. The Highway Authority was concerned by the degree to which the results differed from previous assessment and needed to be satisfied that the surveys gave a reliable representation of the network. To address these concerns two sets of sensitivity tests were carried out, and all other available local and national traffic data sets were scrutinised. The baseline models have been subject to robust assessment and the results of these describing the current performance of the network are now accepted by the Highway Authority.

A summary of the current junction performance is set out overleaf, as found in table 4.10 of the TA;

Junction	2022 Operation
Pinewood Road / Pinewood East Access	Below Operational Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity
Pinewood Road / Sevenhills Road	Below Operational Capacity
A412 Denham Road / Sevenhills Road	Below Maximum Capacity
Pinewood Road / Pinewood Green	Below Operational Capacity
Five Points Roundabout	Below Maximum Capacity
A412 Church Road / Thornbridge Road	At Capacity
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity
A412 Uxbridge Road / Black Park Road	Below Operational Capacity

The table uses Ratio of Flow to Capacity (RFC) values to determine the thresholds for the colour coding, below 0.85 for below operational capacity, between 0.85 and 1 for below maximum capacity and greater than or equal to 1 for at theoretical capacity.

#### Proposed Scheme and access

The proposed scheme is for two key elements, the development of the land south of Pinewood Studios as production studios, education hub and a business growth hub (Centre Stage), and to the north of the existing studios: backlots; workshops; and a nature reserve at Alderbourne Farm. This proposal turns Pinewood studios into a campus of four sites, served by Pinewood Road and the western end of Sevenhills Road. It was a concern to the Highway Authority that this section of the public highway stands to become a defacto estate road serving internal movements between the different elements of the Pinewood estate. In order to demonstrate that the proposals will not prevent Pinewood Road remaining

available for normal use by the traveling public, including residents on Pinewood Road and Pinewood Green an internal trips assessment has been supplied showing that the numbers of expected internal trips using Pinewood Road are not greater than 10 in any one peak hour and this is not a concern to the Highway Authority.

The Pinewood South element of the development is proposed to be accessed by two access points on Pinewood Road and one left in and left out access point on the A412 Uxbridge Road on the approach to Five Points Roundabout. These access points are as designed and approved by the previous permission for Screen Hub UK and are therefore established as being safe and suitable for accessing the site.

Mindful of the above comment the development proposals do not present any description of additional security gateway proposals, such as are found at Pinewood West, or Pinewood East. Rather the accesses are described as being as proposed for the SHUK application, priority junctions as were proposed for public access car parks which would allow free dispersal within the car parks. The Highway Authority will therefore require by condition that details of security at the access points are addressed through reserved matters applications. It should be noted that it shall be a requirement of these applications to show how any security measures will be positioned in such a way as to ensure that there will be no standing traffic backing onto the public highway. This shall be by necessity a condition that must be satisfied prior to commencement of the site.

Access to Alderbourne Farm is proposed to be achieved through the creation of a new priority junction on Sevenhills Road, within the new section to be created as part of that scheme. The principal of this access is accepted, however it is noted as above that as a matter of reserved matters it will be required that details of the separation of the public access and the secure studio activities are to be managed and arranged.

It is proposed that layby parking will be maintained on the A412 Uxbridge Road through re-provision of parking spaces within other laybys. This is accepted and required by the Highway Authority to ensure that there is no loss in provision of these well used laybys and therefore no worsening of the highway safety with additional parking taking place on the dual carriageway.

Pedestrian and cycle access to the site is proposed to be provided to the studios space through the existing footway on Pinewood Road and the provision of footways into the site at the access locations. Alderbourne Farm will have a pedestrian access along the existing farm access for the public access areas.

As all other matters are reserved other than access this is not an opportunity to comment on matters of the internal road layout or parking provision, however at the reserved matters stage it will be necessary for the applicants to supply a comprehensive parking accumulation exercise in order to demonstrate the parking provision is appropriate within the multi-story car parks.

Scheme impacts



The Transport Assessment presented assessment of impacts in 2026 and 2036, as a year of opening and the end of the local plan period in line with normal practise. Comparative assessments have been carried out between a future year of no development on the site, the previously permitted Screen Hub UK proposals and the future year with this development. All future year assessments include both the Five Points Roundabout and Sevenhills Road schemes being implemented.

Since the submission of the Transport Assessment, to address the concerns of the Highway Authority additional capacity testing has been submitted in the form of technical notes. These notes are titled;

ITL17509-024A TN Sensitivity Test Scenario ITL17509-025 TN Traffic Flow Diagrams and Comparison ITL17509-032TN ATC Analysis and Sensitivity Test 2 Parameters ITL17509-030A TN Sensitivity Test 1 [2nd issue] ITL17509-034 TN Sensitivity Test 2 ITL17509-037A cumulative Impact Assessment ITL 17509-042 TN Potential Internal Trips

This response shall address the information contained within these notes following assessment of the information contained within the Transport Assessment, and explanation of the concerns that give rise to the additional information being provided.

It should be noted that the assessments of the highway impacts assume full development build out, and the full implementation of mitigation schemes at Five Points Roundabout and Sevenhills Road. The expectation of these schemes being implemented permits the applicants to reassign traffic over the network. The reassignment approach that has been used is the same as was submitted and accepted by the Highway Authority during the application for the Sevenhills Road scheme.

The Transport Assessment sets out that the overall trip generation of this proposal is less than that for the previously permitted Screen Hub UK application. It is accepted by the applicants that this proposal will result in greater numbers of peak hour trips, but less trips in the inter peak periods and at weekends, as would be expected due to the differences in the nature of the applications, and the absence of the visitor attraction element.

The modelling results supplied cover the following junctions: • Pinewood Road /Pinewood East Access • Pinewood Road/Pinewood West Access • Pinewood Road/Sevenhills Road • A412 Denham Road/Sevenhills Road • Pinewood Road/Pinewood Green • Five Points Roundabout • A412 Church Road/Thornbridge Road(Mini Roundabout) • A412 Church Road/Bangors Road North (Mini Roundabout) • A412 / Black Park Road • Pinewood Road site accesses • A412 left in/left out access • Alderbourne Farm site access

The above modelling uses the same models that were submitted for previous applications and therefore the geometry, calibration and fixed parameters within them has been checked and accepted by the Highway Authority.

A summary of the modelling impact assessment comparing the 'without development' against the 'with development including mitigation' is shown below (taken from table 13.23 of the Transport Assessment). This table includes the summary of the assessment of the

SHUK to provide a comparison between the two schemes. It is helpful to understand this given that the Highway Authority has previously accepted that impact.

**Table 13.23: Summary of Traffic Impact Analysis**

Junction	Do Nothing	With SHUK	With Development
Pinewood Road / Pinewood East Access	Below Capacity	Below Capacity	Below Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
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	Below Capacity	Below Capacity	Below Capacity
Five Points Roundabout	Below Capacity (with new signals)	Below Capacity (with new signals and SHR upgrade)	Below Capacity (with new signals and SHR upgrade)
A412 Church Road / Thornbridge Road	Over Capacity	Over Capacity, but with reduced queuing and delay compared with Do Nothing	Over Capacity, but with reduced queuing and delay compared with Do Nothing
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
A412 Uxbridge Road / Black Park Road	Below Capacity	Below Capacity	Below Capacity

The following assessment description focuses on the primary junctions impacted by development traffic which are: the A12 Denham Road/ Sevenhills Road; the two mini roundabouts on Church Road with Thornbridge Road; Bangors Road respectively and Five Points Roundabout. Points of access and junctions that are minimally affected have also been reviewed.

#### A412 Denham road/Sevenhills road

This junction is operating over capacity with long wait times on Sevenhills Road, this relates to the extremely dominant flow along the A412 at this location preventing the opportunity for vehicles to turn right into Sevenhills Road or to exit Sevenhills Road. The modelling results reflect this with movements at this junction being reported as having an RFC of greater than 1, and on Sevenhills Road in excess of 2. The generally agreed practical capacity of a junction is at an RFC of 0.85 or 85%. While junctions can still operate within theoretical capacity with an RFC value of up to 1 (100%), as theoretical capacity approaches 100%, delays will increase significantly. Without mitigation at this junction the results in the future

year (2036) with development traffic, leads to an infinite result, indicating that the junction performance deteriorates to such an extreme that the model is no longer able to provide any functional estimation of the situation.

With the signals in place the results improve, providing control of the dominant flows, and enabling right hand turn manoeuvres to be undertaken in a safe manner with controlled turning movements, (it should be noted that traffic signals modelling results are reported in a different manner), and the Sevenhills road arm of the junction operates just within capacity. Queuing and delay are reduced on Sevenhills Road with the most noticeable improvements within the AM peak hours. With the provision of signals and the new development traffic the junction performance comes close to the theoretical capacity, and this is due to new turning volumes. A further sensitivity test has been undertaken to consider the impact of higher development flows at the junction. This is discussed further in the later sections of this response.

#### A412 Junctions with Thornbridge Road

The Thornbridge Road junction is shown to be operating close to its practical capacity at present and with particular issues occurring in the PM peaks on Thornbridge Road. In the future development year (2036) the situation on this arm improves relative to the situation that would occur due to background growth alone (no development or mitigation), due to reassignment of traffic onto Sevenhills Road. However, whether the development comes forward the A412 arms will remain at or over the maximum capacity.

#### Bangors Road North

The situation at Bangors Road North is similar, however the results are more favourable than those for Thornbridge Road with the junction performing within theoretical capacity in all scenarios.

#### Five Points Roundabout

The Five Points Roundabout junction has been modelled only as a signalised junction in the future years, this is due to the requirement incumbent on Pinewood Studios to deliver a scheme to introduce signals at this junction as part of the 2013 PSDF permission. The results demonstrate that the junction will operate in the 2036 year within capacity, with the greatest demands being placed on the A412 Church Road, wood Lane and the A412 Uxbridge Road. Similarly, the Highway Authority recognises the sensitivity of this junction and the need to ensure that this assessment is robust. Therefore, the sensitivity testing that was required has looked at this junction again.

#### Site Access Junctions

The site access junctions have been shown to have surplus capacity and therefore the Highway Authority does not have concerns regarding this, subject to the previously discussed requirements to ensure that the security measures that are presented within a reserved matters application to not cause the traffic using these junctions to queue back to the public highway and therefore negate these findings.

#### Pinewood Green

The junction of Pinewood Green with Pinewood Road operates with surplus capacity due to the re-routing of traffic onto Sevenhills Road. It is expected that with the introduction of the Sevenhills Road scheme less traffic will use Pinewood Green to access the site.

#### Fulmer

The Transport Assessment proceeds to make assessments of roads to the north and west of the site as well as Pinewood Green. With respect to the north and west (Fulmer parish) it is the Highway Authority's position that there is an impact on this area as a result of the development. This impact is small enough to not warrant junction assessments in this area, but significant enough that the proposed contribution to highway schemes within the parish should be secured to mitigate the impacts of additional through traffic and in recognition of the safety concerns within the parish, regarding speed and highway layout. A contribution is proposed in a similar way for schemes within Iver Parish, the Highway Authority is of the same view with respect to this as that for Fulmer.

The Sevenhills Road mitigation also serves to provide a suitable alternative to the route through Pinewood Green which is not appropriate for development traffic being a residential area with a width restriction in its centre. At the junction of Thornbridge Road with the A412 there is an existing congestion issue, compounded by parking for the local shops and services. Development traffic being added to this junction gives rise to safety concerns due to the effective reduction in available carriageway and reduced opportunities for the passing of vehicles. Pedestrian safety is also a concern in an area that suffers from such congestion being present where there are parking manoeuvres taking place.

There is no information contained within the application documents as to how much of the development can be occupied before Sevenhills Road is delivered. The Highway Authority requested an assessment to identify a trigger point at which the mitigation would need to be delivered however the applicants have declined to provide this information. In the absence of a submission being present, in order to identify the trigger for the mitigation being necessary a further assessment shall be conditioned to be submitted prior to commencement and at the point of the first reserved matters application. The Highway Authority notes that the current permission for the Sevenhills Road Scheme (PL/19/4430/FA) requires that the scheme is completed and open within 18 months from commencement on site. This requirement is considered to be a requirement of any renewals of permission to ensure that the mitigation is complete and delivered in a timely way.

It is also proposed that a tarmac footway shall be provided along Pinewood Road to the north of Pinewood East roundabout. This provides pedestrian access to the Alderbourne Farm site for both the backlots and the public access nature reserve.

This development represents significant increases in traffic volumes during the peak hours, and lower impacts in the off peak periods. The SHR scheme provides opportunity to route some of the development traffic away from existing locations of congestion resulting in an impact that is less than severe.

Opportunities for Sustainable travel

To address matters of sustainable transport a Framework Travel Plan (FTP) has been submitted as part of the planning application. The FTP sets out the current mode shares on the site, and the parameters against which targets for changes in mode share are to be set. It also sets out at a high level the measures by which the travel plans shall seek to achieve those targets. These are to be delivered in conjunction with the existing travel planning taking place on the site.

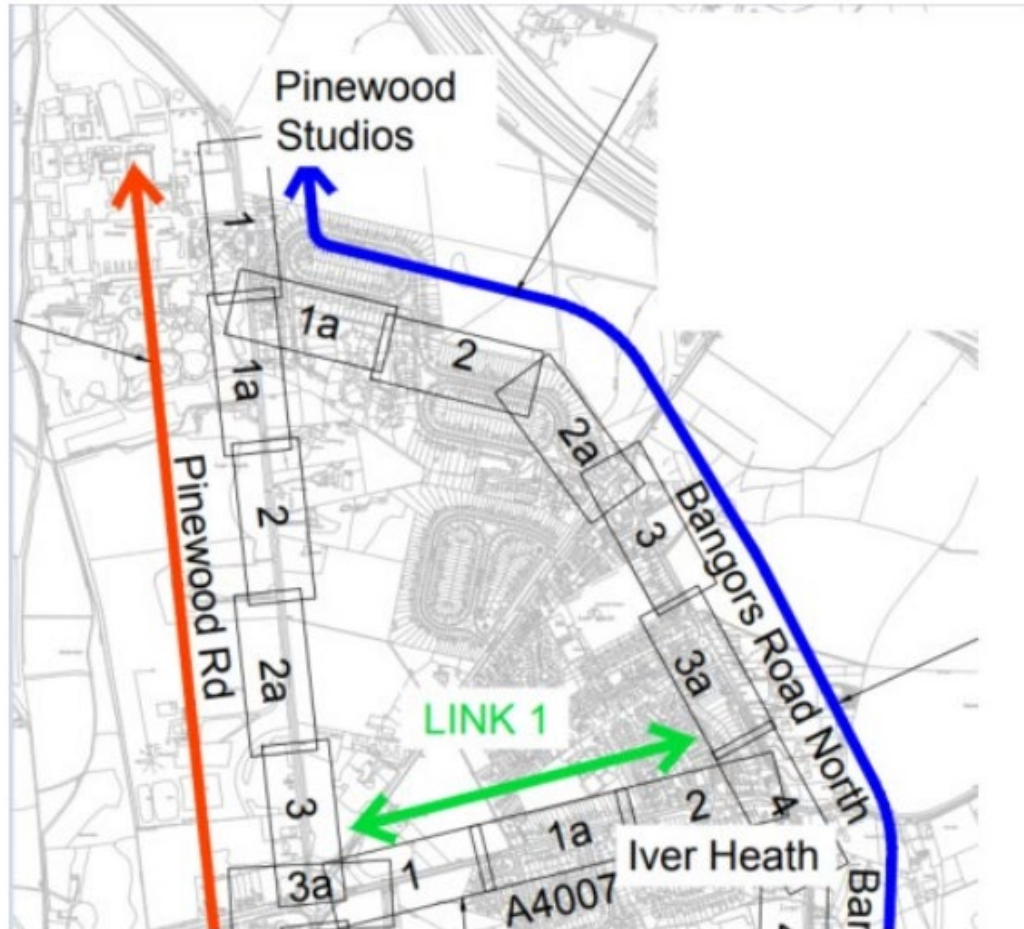
The Highway Authority accepts the Framework Travel Plan (issue 2 revision E) and shall condition this as the basis for detailed travel plans to be submitted as part of reserved matters applications. It is also proposed that the existing shuttle bus services provided by Pinewood to employees and users of the studios will be expanded to cover the new studios space. This is agreed by the Highway Authority as necessary in order to provide connectivity to other public transport hubs given the particularly low level of provision in the Ivers of commercial bus services.

The travel plan is supported by the provision of a signing strategy for all modes of transport that covers the whole of the Ivers Parish and extends to the M40 Junction 1 in the north. This shall be conditioned to be delivered in full prior to occupation of the site to ensure that staff and visitors have the best available information regarding routing for all modes of transport.

Pedestrian and cycling facilities will be present within the Five Points Roundabout scheme which shall improve access to the site over this junction that is currently a barrier to walking and cycling in the area.

The Highway Authority has considered the wider matters regarding the sustainability of the site and the ability of future people accessing the site, in addition to the findings of previous Planning Inspectors and the Secretary of State regarding the sustainability of the site. The development must meet the following requirements of the NPPF paragraph 110; Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up given the type of development and its location.

Both Langley and Iver rail stations are within cycling distance of the studios. The Ivers Cycle Strategy identifies cycle schemes which link Pinewood studios to these rail stations and the local area. The securing of a contribution (relative to the scale and kind of the development) to either a route to Iver or Langley station would enable the development to meet the above NPPF para 110. The Highway Authority proposes this application secures a contribution to enable the delivery of the northern section of the Pinewood - Iver station cycle route. The parts of the route to be secured are along the A4007 Slough Road and through Pinewood Green and Bangors Road north. The sections of routes a financial contribution is sought for enable their full delivery and are identified in the below diagram coloured in blue and green



These routes complement the existing provision that has been made on Pinewood Road between Five Points Roundabout and the studios entrance. They will form options for those approaching from Iver village and station or the Uxbridge area to reach the different access points to the studios.

#### Construction Traffic

The application does not address the construction traffic impacts within the documentation; however, these are temporary impacts on the highway network and so do not form part of the assessment of this application. The Highway Authority will be conditioning a full Construction Traffic Management Plan, as is standard practice with large sites. This shall be required to be submitted for approval prior to commencement.

#### Conclusions

To conclude, the Highway Authority has determined that the assessment that has been undertaken, inclusive of the additional information and the conditions and obligations recommended demonstrates that the proposals: - do not give rise to a severe impact on the highway network; - safe and suitable travel can be achieved by all uses; - opportunities to promote sustainable travel have been take up given the type of development and location; and - once the full mitigation package is delivered in its entirety the significant impacts of the development on the transport network in terms of capacity, congestion and highway safety will be effectively mitigated to an acceptable degree.

Mindful of the above the Highway Authority have no objections subject to the obligations and conditions set out below:

### **National Highways – 15 September 2022**

National Highways Ref: 95782

Referring to the consultation letters dated 10th and 25th August 2022 on the planning application referenced above, in the vicinity of the M25 and M40 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

National Highways Planning Response (NHPR 21-09) September 2021 Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence. Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

### **Annex A National Highways' assessment of the proposed development**

National Highways ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

We have reviewed the supporting Transport Assessment (TA), dated 11<sup>th</sup> July 2022.

The site is split to the north and south of the existing Pinewood Studios. Details about the site, the area and the proposed development are included in the TA. It is understood that the site currently has several existing uses. The proposal is to develop land to the south of the existing studios to deliver additional production studios space, an education hub and a business growth hub. On land to the north at Alderbourne Farm the proposed scheme includes the provision of backlots, workshops and a nature reserve.

It is understood that whilst it is anticipated that there will be a Framework Travel Plan (FTP) in place aiming to promote multiple occupancy car use and limit the use of cars entirely, the traffic impact analysis set out in the TA is not contingent on this being met immediately, i.e. the estimated traffic generation assumes that existing mode share will continue and is therefore a 'worse case'.

Whilst the submitted TA references the Screen Hub UK (SHUK) scheme, which has been given planning approval (PL/20/3280/OA), it does not appear that National Highways were consulted on this planning application.

The proposed methodology for determining the existing and proposed trip generation seems logical. Clarification as to the distribution of new trips onto the network is required in regard to the methodology for each land use and an explanation why the SHUK scheme is used to compare the proposed development against except for the delivery of the Seven Hills Road Improvement scheme (SHR). The TA in section 10.6.1 states that the SHR would be delivered as part of the Pinewood South proposal as an alternative to SHUK anyway.

Based on the trip generation methodology outlined in the TA, the net difference between the existing land used and the proposed is shown to have an increase in both the AM peak and PM peak. The Applicant should provide a net difference table indicating the change in vehicle trips from the existing to the proposed development during the AM peak 0800-0900 and the PM peak 1700-1800.

The distribution and junction modelling included in the TA does not cover the SRN. The TA states that the primary route to the studios is from the M40, with the implementation of local junction improvements limiting traffic through Iver Heath and Pinewood Green. It is requested that the Applicant provide the traffic flow impact information during the AM and PM peak hours of 0800-0900 and 1700-1800 at the M40 Denham Interchange on all arms in the form of flow diagrams to allow National Highways to understand the impact on the SRN.

On the basis of a proposed net trip increase, additional data collection and junction impact assessment maybe be required at:

- M40 Denham Interchange

This would require a year opening with all development traffic assessment to be undertaken, as per DfT Circular 02/13.



In addition to the above the Applicant should consider the impact of construction. A Construction Environment Management Plan (CEMP) will be a recommended condition should all other outstanding matters be resolved. This should include; construction traffic routes, trip numbers, parking and turning provision to be made on site, measures to prevent debris from being deposited on the highway, delivery times and a programme for construction.

The Applicant proposes a signage strategy that changes signage on the M40 Denham Interchange, shown in TA Image 10.2. Further detail is required in relation to the proposed changes (i.e. what wording is proposed to be added to the signage). We will then be able to inform applicant of further steps to be undertaken as this is a separate matter to the planning proposal and will entail consulting other colleagues in our organisation.

### **Recommended Non-Approval**

It is recommended that the application (Ref: PL/22/2657/FA) should not be approved for a period of 56 days (until 8<sup>th</sup> November 2022) from the date of this recommendation to allow the applicant time to respond to the outstanding technical matters.

Reason: To allow National Highways to understand the impact of the development on the safe and efficient operation of the Strategic Road Network and provide the Local Planning Authority with fully informed advice.

### **National Highways – 10 November 2022**

National Highways Ref: 95782

Referring to the consultation letters dated 10th and 25th August 2022 on the planning application referenced above, in the vicinity of the M25 and M40 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

National Highways Planning Response (NHPR 21-09) September 2021 Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence. Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

## **Annex A National Highways' assessment of the proposed development**

National Highways ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

National Highways have reviewed the Pinewood Studios Screen Hub: Response to National Highways dated 3 October 2022 Technical Note. We have also reviewed the supporting Transport Assessment (TA), dated 11<sup>th</sup> July 2022. A number of outstanding actions remain and the applicant has submitted a second Technical Note Pinewood Studios Screen Hub: 2<sup>nd</sup> Response to National Highways dated 3 November 2022 which is in the process of being reviewed.

The site is split to the north and south of the existing Pinewood Studios. Details about the site, the area and the proposed development are included in the TA. It is understood that the site currently has several existing uses. The proposal is to develop land to the south of the existing studios to deliver additional production studios space, an education hub and a business growth hub. On land to the north at Alderbourne Farm the proposed scheme includes the provision of backlots, workshops and a nature reserve.

It is understood that whilst it is anticipated that there will be a Framework Travel Plan (FTP) in place aiming to promote multiple occupancy car use and limit the use of cars entirely, the traffic impact analysis set out in the TA is not contingent on this being met immediately, i.e. the estimated traffic generation assumes that existing mode share will continue and is therefore a 'worse case'.

Whilst the submitted TA references the Screen Hub UK (SHUK) scheme, which has been given planning approval (PL/20/3280/OA), it does not appear that National Highways were consulted on this planning application.

The proposed methodology for determining the existing and proposed trip generation seems logical. Clarification has been sought as to the distribution of new trips onto the network in regard to the methodology for each land use. Whilst the distribution methodologies for the business growth and education hub are accepted, discrepancies in the ANPR data used for the distribution of the new studio production space have been noted and further details provided are in the process of being reviewed.

Based on the trip generation methodology outlined in the TA, the net difference between the existing and proposed land uses is shown to have an increase in both the AM peak 0800-0900 and PM peak 1700-1800. Whilst a net difference table has been provided further detail is required to demonstrate the turning movements through the junction and in particular the volume of additional trips on the on and off-slips of the M40 and A40.

It is requested that the Applicant provide the net traffic flow impact information during the AM and PM peak hours of 0800-0900 and 1700-1800 at the M40 Denham Interchange on all arms in the form of flow diagrams to allow National Highways to understand the impact on the SRN.

On the basis of a proposed net trip increase, additional data collection and junction impact assessment may be required at:

- M40 Denham Interchange

This would require a year of opening with all development traffic assessment to be undertaken, as per DfT Circular 02/13.

In addition to the above the Applicant should consider the impact of construction. A Construction Environment Management Plan (CEMP) will be a recommended condition should all other outstanding matters be resolved. This should include; construction traffic routes, trip numbers, parking and turning provision to be made on site, measures to prevent debris from being deposited on the highway, delivery times and a programme for construction.

The Applicant proposes a signage strategy that changes signage on the M40 Denham Interchange, shown in TA Image 10.2. The proposed signage strategy includes a series of local network signs to direct traffic to use Sevenhills Road rather than travelling through Iver Heath, clearer signage at the M40 Denham Interchange and signage for cyclists from the local area. It is noted that the A412 Denham Road provides the only route to and from the M40 and hence it should be considered whether signage is required at the M40 Denham Interchange to support the wider signage strategy. If signage is provided at the M40 Denham Interchange, National Highways recommend that signage is provided also on the eastbound M40 off-slip. Any proposed changes or additional signage within the SRN highway boundary will require approval from the Safety, Engineering and Standards (SES) team at National Highways to mitigate and maintain the safety and efficient operation of the SRN.

In light of additional actions identified following a review of a Technical Note prepared by iTransport titled 'Pinewood Studios Screen Hub: Response to National Highways' (Technical Note) dated 3 October 2022 and a subsequent Technical Note dated 3 November 2022, which is currently under review, ongoing discussions regarding the impact of the proposed development on the M40 Denham Interchange are taking place.

### **Recommended Non-Approval**

It is recommended that the application (Ref: PL/22/2657/FA) should not be approved for a period of 56 days (until 3rd January 2023) from the date of this recommendation to allow the applicant time to respond to the outstanding technical matters. Reason: To allow National Highways to understand the impact of the development on the safe and efficient operation of the Strategic Road Network and provide the Local Planning Authority with fully informed advice.

### **National Highways – 25 November 2022**

National Highways Ref: 95782

Referring to the consultation on a planning application dated 10th and 25th August 2022 referenced above, in the vicinity of the M25 and M40 at that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) ~~offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**
- c) ~~recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- d) ~~recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

## **Annex A National Highways' assessment of the proposed development**

National Highways (“we”) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

### **Recommendation:**

**that conditions should be attached to any planning permission that may be granted:**

### **Reasons:**

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M25 and M40, in particular the M40 Denham Interchange.

National Highways concludes that sufficient information has been provided by the applicant to assess the impact of the development on the safe and efficient operation of the Strategic Road Network, particularly at the M40 Denham Interchange.

Having assessed application PL/22/2657/FA we are content that the proposals, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (M25 and M40)), provided that the following conditions are imposed, (reflecting the DfT Circular 02/13 Para 8 -11 and MHCLG NPPF 2021 Para 110-113 tests).

As the signage strategy for the site is developed, we strongly recommend early engagement with National Highways if it is intended to locate signs on or close to the M40.

National Highways recommends that the following conditions are implemented within any planning permission granted:

1. No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Environmental Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Environmental Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

**Reason:** To ensure that the M25 and M40 Trunk Road, alongside the M40 Denham Interchange continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

**Informative:** The CEMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of

the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site (including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

### **National Highways – 25 November 2022**

Thank you for your Technical Note dated 3 November 2022, consulting National Highways (formerly as Highways England) on the Pinewood Studios Screen Hub: 2nd Response to National Highways Technical Note.

We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

As such, we will be concerned with plans or proposals that have the potential to impact on the safe, reliable and efficient operation of the SRN, in this case, the M25 and M40, in particular the M40 Denham Interchange.

We have reviewed the supplied Technical Note, considering the actions identified in the National Highways email dated 21 October 2022. We conclude that no further actions are required to fully assess the impacts of the proposed development on the SRN.

As the signage strategy for the site is developed, we strongly recommend early engagement with National Highways if it is intended to locate signs on or close to the M40.

Please find attached our formal NHPR response recommending a planning condition for a Construction Environmental Management Plan be attached to any permission which may be granted.

### **National Highways – 25 November 2022**

#### **Land South of Pinewood Studios and Alderbourne Farm**

#### **Pinewood Studios Screen Hub – Response to National Highways – 2nd Technical Note Review**

#### **Purpose of Report**

**1.1** This Technical Report has been prepared by SYSTRA on behalf of National Highways following a review of a Technical Note prepared by i-Transport titled 'Pinewood Studios Screen Hub: 2 nd Response to National Highways' (2 nd Technical Note) dated 3 November 2022 (ref: ITL17509- 029 TN).

**1.2** The Pinewood Studio Screen Hub (PSSH) application was validated on the 29 July 2022 (ref: PL/22/2657/FA).

**1.3** National Highways were consulted on the Transport Assessment prepared to support the planning application in August 2022 and provided a NHPR Holding recommendation dated 15 September 2022, which recommended that planning permission should not be approved for a period of 56 days (until 8 November 2022) from the date of the recommendation to allow the applicant time to respond to the outstanding technical matters.

**1.4** In response to the outstanding technical matters, i-Transport prepared a Technical Note (1st Technical Note) dated 3 October 2022. National Highways reviewed this Technical Note and concluded a number of outstanding actions remain. In response to the outstanding actions, iTransport prepared a 2nd Technical Note, dated 3 November 2022.

**1.5** National Highways provided a NHPR Holding recommendation dated 8 November 2022 which recommended that planning permission should not be approved for a period of 56 days (until 3 January 2023). It is noted that upon completion of the review of the 2nd Technical Note, should all actions be satisfactorily resolved it is possible for a new NHPR from to be issued revoking the holding response recommendation prior to its expiry date.

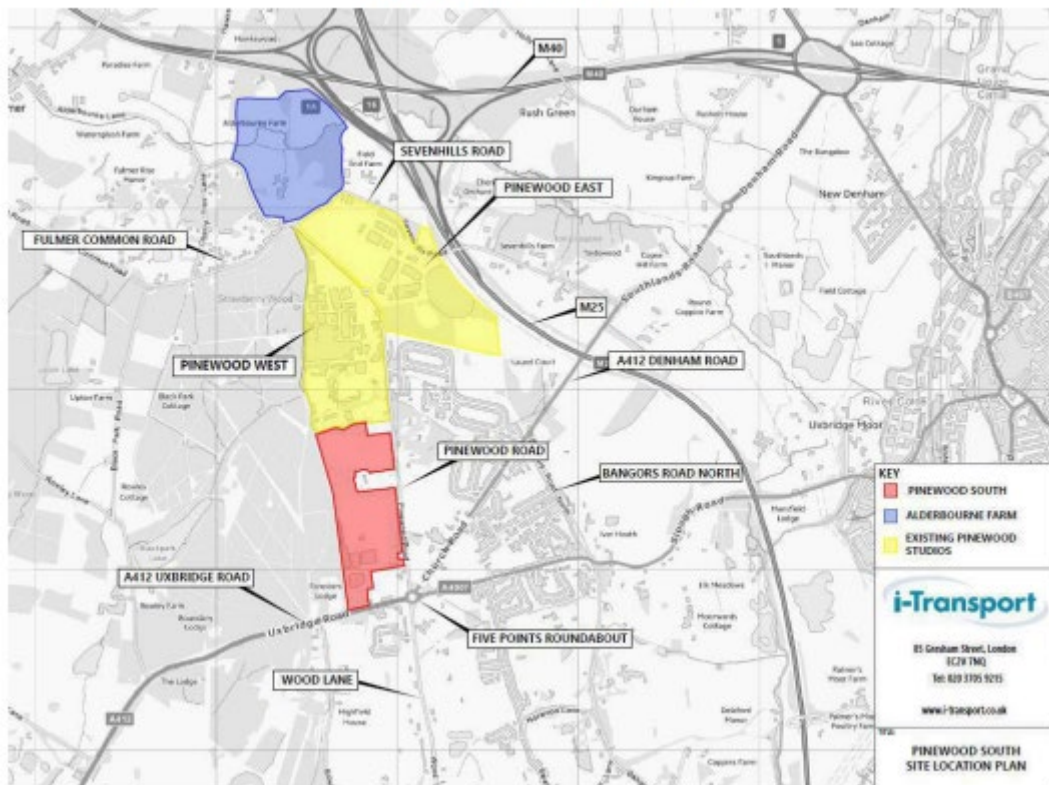
**1.6** The headings below correlate to sections within the Response to National Highways 2nd Technical Note which have been reviewed, and any outstanding actions are noted.

## **Technical Note Review and Outstanding Actions**

### **Background**

**1.7** The site location is noted in Figure 1 below. Figure 1. Site Location plan

**Figure 1. Site Location plan**



**1.8** The site is split to the north and south of the existing Pinewood Studios. Details about the site, the area and the proposed development are included in the TA and 1<sup>st</sup> Technical Note. It is understood that the site currently has several existing uses. The proposal is to develop land to the south of the existing studios to deliver additional production studios space, an education hub and a business growth hub. On land to the north at Alderbourne Farm the proposed scheme includes the provision of backlots, workshops and a nature reserve.

**1.9** National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

**1.10** PSSH is an alternative scheme to SHUK, which has planning permission (ref: PL/20/3280/OA). As noted in the National Highway response email dated 21 October 2022, it does not appear that National Highways were consulted on this planning application.

**1.11** The 2<sup>nd</sup> Technical Note outlines a response to the NH email dated 21 October 2022, for the following actions:

- Clarification of the production space land use traffic distribution discrepancies at the Denham Interchange and the A412 Denham Road / Sevenhills Road junction.
- Net traffic flow diagrams are requested at the Denham Interchange.
- Clarification on whether the ongoing sensitivity test assessments discussed with Buckinghamshire Council (BC) alter the conclusions and net trip generation at the Denham Interchange.



- Confirmation that a Construction Environmental Management Plan (CEMP) will be secured via Condition.
- Further comments on the proposed signage strategy.

**1.12** This report outlines the actions in the email dated 21 October 2022, in bold italics and provides commentary on each item below on the acceptability of the additional information and justification of approach provided.

**Production Space Traffic Distribution Clarifications**

**1.13** In the NH response dated 21 October 2022, the following clarification was requested **“Applicant to provide clarity on the Production Space Land Use traffic distribution discrepancies at the Denham Interchange and A412 Denham Road. Trip Generation and Net Traffic Impact.”**

**1.14** NH requested clarification on discrepancies for the production space traffic distribution for the Denham Interchange shown within Appendix D Figures 1a and 1b, as the figures do not match the Pinewood East traffic distributions for the A412 Denham Road, listed within Appendix C Tables 3.3 or 3.4 of the 1<sup>st</sup> Technical Note. The distributions have been derived using ANPR data. Table 3.4 in Appendix C and Figure 1b in Appendix D is replicated below

**Table 1. Traffic Assignment – A412 Denham Road**

**Table 3.4: Existing Traffic Assignment – Between Pinewood East and the A412 Denham Road (0700 – 0900 and 1700 – 1900)**

	0700– 0900		1700 – 1900	
	Arrivals	Departures	Arrival	Departures
Via Pinewood Road / Sevenhills Road	7%	3%	5%	9%
Via Pinewood Green	15%	21%	5%	19%
Via A412 Church Road	3%	3%	0%	7%
<b>Total</b>	<b>25%</b>	<b>27%</b>	<b>10%</b>	<b>35%</b>



**Table 2. ANPR Traffic Distribution**

Arrivals											
Destination	Time Period	Origin									
		Alderbourne Rd	Fulmer C. Rd	A412 Denham Road (NE)			A4807	Wood Ln	A412 (W)	Bangors Rd N	
				via Sevenhills Rd	via Pinewood Gr	via A412 Church Road					
Pinewood W	0700 - 0900	75	171	56	209	29	52	257	115	54	
	1700 - 1900	7	15	6	23	10	15	44	37	2	
Pinewood E	0700 - 0900	39	55	22	49	9	17	79	45	3	
	1700 - 1900	1	3	1	1	0	0	4	8	1	

Proportion of Studios Traffic travelling to each Destination in Peak Periods 0700-0900 & 1700-1900.

Departures											
Origin	Time Period	Destination									
		Alderbourne Rd	Fulmer C. Rd	A412 Denham Road (NE)			A4807	Wood Ln	A412 (W)	Bangors Rd N	
				via Sevenhills Rd	via Pinewood Gr	via A412 Church Road					
Pinewood W	0700 - 0900	3%	12%	1%	16%	14%	21%	20%	7%	7%	
	1700 - 1900	6%	16%	6%	26%	5%	7%	21%	13%	1%	
Pinewood E	0700 - 0900	9%	28%	3%	21%	3%	17%	17%	10%	6%	
	1700 - 1900	7%	15%	9%	19%	7%	8%	19%	15%	2%	

Arrivals											
Destination	Time Period	Origin									
		Alderbourne Rd	Fulmer C. Rd	A412 Denham Road (NE)			A4807	Wood Ln	A412 (W)	Bangors Rd N	
				via Sevenhills Rd	via Pinewood Gr	via A412 Church Road					
Pinewood W	0700 - 0900	8%	17%	6%	21%	8%	5%	26%	12%	1%	
	1700 - 1900	4%	8%	4%	14%	4%	8%	28%	23%	1%	
Pinewood E	0700 - 0900	12%	17%	7%	15%	3%	5%	23%	14%	1%	
	1700 - 1900	3%	16%	5%	9%	0%	0%	21%	42%	3%	

**1.19** This data notes that Pinewood Green should have a 5% traffic distribution in the evening for arrivals, and not 6%, as the applicant has suggested. However, NH note that rounding discrepancies in the table above do allow for a 1% uplift in distribution, and using a 6% distribution is more robust than 5% and given the resultant volume of trips it would not alter conclusions regarding the assessment of impacts at the M40 Denham interchange.

**1.20** This approach is therefore considered suitable, with any discrepancies having been justified by the applicant. No further action is required.

**Net Traffic Flows at the Denham Interchange**

**1.21** In the NH response dated 21 October 2022, the following was requested ***“The applicant to provide a net vehicle traffic junction flow diagram at the M40 Denham Interchange to clearly demonstrate the turning movements through the junction and in particular the volume of additional trips on the on and off-slips of the M40 and A40.”***

**1.22** Table 3 below, copied from the 2<sup>nd</sup> Technical Note presents the net impact of vehicle trips on the Denham interchange. In total across all arms of the Denham interchange the total peak two-way flows is a net increase of 53 vehicle trips in the AM (07:00-08:00) and a net reduction of eight vehicle trips in the PM (17:30-18:30). During a meeting with i-Transport on 14 November 2022, it was confirmed that the proposed development trips were highest during the 07:00-08:00 and 17:30-18:30 time periods, given the shift patterns of employees at Pinewood studios. Therefore whilst the 08:00-09:00 and 17:00-18:00 standard SRN network peak has not been provided, the peak proposed development trips provide a robust assessment to judge the potential net change impact at the M40 Denham Interchange.

**Table 3. Total Vehicle Net trip Generation Assessment**

**Table 4.5: Net Impact on M40 Denham Interchange**

Arm	AM Peak Hour 1 (0700 – 0800)	AM Peak Hour 2 (0715 – 0815)	PM Peak Hour 1 (1715 – 1815)	PM Peak Hour 2 (1730 – 1830)
A40 Western Avenue	+13	+6	+1	+1
A4020 Oxford Road	+0	+0	+0	+0
A412 Denham Road	+8	+11	-21	-11
M40	+29	+14	+2	+2
A40 Oxford Road	+3	+1	+0	+0
Denham Court Drive	+0	+0	+0	+0

**1.23** In response to the action, the applicant has provided net vehicle traffic junction flow diagrams, showing the net vehicle trip generation at the M40 Denham Interchange to clearly demonstrate the turning movements through the junction. These diagrams are presented in Image 3.1 to Image 3.4 in the 2<sup>nd</sup> Technical Note.

**1.24** It should be noted that given that the assessment is a net vehicle uplift of the proposed development compared to the consented SHUK scheme the net assessment only presents the level of trips over and above what has already received consent. From a review of the traffic flow diagrams and distribution presented in the SHUK application documents, whilst the flow diagrams do not extend to the M40 Denham Interchange, it is noted that between 116 and 128 two-way trips in the 07:00-08:00 and 07:15-08:15 periods respectively are routed along the A412 Denham Road, north of the junction with Sevenhills Road, suggesting that a significant proportion of these trips would route through the M40 Denham Interchange. In the PM peak (17:15-18:15) this quantum increases to 212 two-way trips.

**1.25** Given the SHUK scheme received planning consent in April 2022, the applicant has considered a net assessment given this represents the fall back position should the planning permission for the proposed development not be granted. **1.26** However based on the highest potential for a net uplift of trips of 53 trips through the M40 Denham Interchange, it is considered that this level of additional trip generation would not warrant further modelling assessment at the junction. The M40 EB off slip generates an additional 29 trips in the AM and a net reduction to the M40 WB on slip in the PM peak compared to the consented scheme. This level of additional trips would not typically warrant further modelling assessments or merge/diverge assessments. Whilst the proposed development in its entirety would warrant further assessment, the net impact assessment does not warrant further assessment. Given the consent granted to SHUK scheme, NH will not be in a position to request additional modelling assessments on the basis of the proposed development. Therefore no further action is required.

### Sensitivity Testing

**1.27** In the NH response dated 21 October 2022, the following point was raised  
***“Clarification is sought as to whether ongoing assessments visible on the planning portal***

***presented in subsequent Technical Notes by i-Transport regarding trip generation sensitivity testing (dated 11th October 2022) and traffic flow distribution (13th October 2022) alter the conclusions and net trip generation for the M40 Denham interchange presented in Table 4.5 of the Technical Note. [1st Technical Note]***

**1.28** In response to this point, the applicant has commented that on-going discussions with BC are in relation pinch points on the local road network. i-transport has undertaken sensitivity assessments at the Five Points Roundabout (junction proposed to be signalised) and the A412 Denham Road/ Sevenhill Road junction (proposed to be signalised as part of the wider Sevenhills Road improvement scheme) in order to future proof the junction improvement schemes as a worst case sensitivity test.

**1.29** The applicant notes that any sensitivity testing does not impact the distribution of vehicles on the SRN, with all vehicles routed via the Five Points Roundabout and the A412 Denham Road/ Sevenhills Road junction, using the M40 Denham Interchange. Therefore, no sensitivity treating is required on the M40 Denham Interchange.

**1.30** NH agree that no further sensitivity testing is required for the SRN as the distribution of vehicles and net trip generation in all scenarios, remains the same. No further action is required.

#### **Construction Environmental Management Plan**

**1.31** In the NH response dated 21 October 2022, the following point was noted ***“A Construction Environment Management Plan (CEMP) will be a recommended condition should all other outstanding matters be resolved. This should include; construction traffic routes, trip numbers, parking and turning provision to be made on site, measures to prevent debris from being deposited on the highway, delivery times and a programme for construction”.***

**1.32** The applicant has agreed that a CEMP should be secured via a planning condition.

**1.33** The following recommended wording for the planning condition has been provided in the associated NHPR form alongside this Technical Note.

- **Condition:** No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Environmental Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Environmental Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).
- **Reason:** To ensure that the M25 and M40 Trunk Road, alongside the M40 Denham Interchange continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.
- **Informative:** The CEMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of

the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site (including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

## Signage

**1.34** In the NH response dated 21 October 2022, the following point was noted “**If signage is provided at the M40 Denham Interchange, National Highways recommend that signage is provided also on the eastbound M40 off-slip. Any proposed changes or additional signage within the SRN highway boundary will require approval from the Safety, Engineering and Standards (SES) team at National Highways to mitigate and maintain the safety and efficient operation of the SRN.**”.

**1.35** The proposed signage strategy includes a series of local network signs to direct traffic to use Sevenhills Road rather than travelling through Iver Heath, clearer signage at the M40 Denham Interchange and signage for cyclists from the local area. The local network signs to direct traffic to use Sevenhills Road, rather than routing through Iver Heath appears logical, however is a matter for the Buckinghamshire Council to consider.

**1.36** It is noted that the A412 Denham Road provides the only route to and from the M40 and hence it should be considered whether signage is required at the M40 Denham Interchange to support the wider signage strategy, as it is noted in the 2<sup>nd</sup> Technical Note that the signs are desirable to provide clear directions to the site, but are not essential, with no analysis in the Transport Assessment analysis being contingent to these signs being provided. Additionally, signage is provided on the A40 westbound off-slip however no signage is proposed on the M40 eastbound off-slip. If signage is provided at the M40 Denham Interchange, National Highways recommend that signage is provided also on the eastbound off-slip.

**1.37** Whilst an upgrade of signage is not considered essential for the SRN, NH recommend that if BC require upgrade of signage, signage is provided in all arms of the M40 Denham Interchange. NH recommend that BC secure any signage upgrades via a planning condition and the applicant liaises with the NH SES team post- consent to agree the signage amendments to mitigate and maintain safety and efficient operation of the SRN.

## Summary and Conclusions

**1.38** This Technical Report has been prepared by SYSTRA on behalf of National Highways following a review of a Technical Note prepared by i-Transport titled ‘**Pinewood Studios Screen Hub: 2<sup>nd</sup> Response to National Highways’ (2<sup>nd</sup> Technical Note)** dated 3 October 2022.

**1.39** National Highways are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 and M40, in particular the M40 Denham Interchange.

**1.40** The net vehicle uplift through the M40 Denham Interchange has been presented, with a total of 53 two-way trips (07:00-08:00) and a net reduction in the PM peak. The peak hours presented reflect the greatest level of proposed development trips in light of staff shift patterns and therefore reflect worst case. The M40 EB off slip generates an additional 29 trips in the AM and a net reduction to the M40 WB on slip in the PM peak compared to the consented scheme. This level of additional trips would not typically warrant further modelling assessments or merge/diverge assessments.

**1.41** The actions identified in the NH response dated 21 October 2022 have been reviewed in light of additional information and assessments presented. Following review of this information, no further action is required by the applicant.

**1.42** NH recommend that any signage upgrades are secured via a planning condition from BC, and if signage is provided at the M40 Denham interchange this should be provided on the M40 EB offslip and agreed with the NH Safety, Engineering and Standards (SES) department post-consent.

**1.43** NH recommend approval of the application, subject to a recommended condition for a CEMP. The suggested wording for this condition has been provided within the updated NHPR form for this planning application, which is issued alongside this Technical Note.

### **National Highways – 20 January 2023**

Thank you for your e-mail dated 21 December 2022 consulting us on the additional information in relation to this proposal.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that may have the potential to impact on the safe and efficient operation of the SRN, in this case, the M25 and M40, in particular the M40 Denham Interchange.

We have reviewed additional information, which included revised development description, Travel Plan and Environmental Impact Assessment. We have considered any implications of the additional information on the proposal and we are satisfied that there will be no adverse effect of the development on the SRN. Our recommendation therefore remains the

same as per our response dated 22 November 2022 when we recommended CEMP condition.

However, we note that applicant's planners (Turley) in their letter dated 9 December 2022 objected to the wording, more specifically, to the inclusion of phrase (unless otherwise agreed in writing) as not being an acceptable formulation for legal reasons, and requested for it to be deleted. Whilst our response was a formal response, we do not have a power of direction and the condition was only a recommendation, so the Local Planning Authority is fully within their own right to word condition as appropriate for the purpose of their 'Final Decision' to ensure it is enforceable. If the authority wishes us to amend the wording and resend the formal recommendation we would be very happy to do so. If that is required please inform us via our team's inbox: [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk)

### **National Highways – 27 January 2023**

Thank you for your initial e-mail dated 21 December 2022 consulting us in relation to this proposal. We have also received Technical Note (ref: JCB/ITL17509- 043A) on 23 January 2023 from i-Transport (Duncan Finlay) and the same TN directly from you on 26 January 2023, providing additional information, clarifying an inaccuracy in the information previously provided. National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that may have the potential to impact on the safe and efficient operation of the SRN, in this case, the M25 and M40, in particular the M40 Denham Interchange. We have now reviewed additional information, which related to an increase in studio floorspace to be built out for the committed (but unbuilt) Pinewood Studios Development Framework (PSDF) from 8,203sqm to 14,102sqm, which wasn't considered in previous cumulative assessments and effectively increases the overall floorspace by 5,899 sqm. The applicant has applied the agreed Pinewood Studios trip rates to this additional 5,899sqm uplift. We have considered implications of the resultant additional vehicular trips routing via the M40 Denham interchange over the trip levels previously assessed, which is a maximum of 7 trips in the AM and 8 trips in the PM. Overall, there are a maximum of 60 additional trips generated in the AM peak (07:00-08:00), including 33 trips on the M40 eastbound off-slip. Based on the minor increase of trips, our recommendation therefore remains the same, as per our response dated 25 November 2022, when we recommended CEMP condition (response is attached for convenience).

### **National Planning Casework Unit – 15 August 2022**

I acknowledge receipt of the environmental statement relating to the above proposal.



I confirm that we have no comments to make on the environmental statement.

### **Natural England – 1 September 2022**

Thank you for your consultation on the above dated 10 August 2022 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **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 options should be secured:

- A Construction Method Statement as mentioned within the Environmental Statement Vol 1B 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 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 281 (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.

#### **Green Infrastructure**

We welcome the inclusion of Green Infrastructure. GI refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

The Natural Environment Partnership undertook Green Infrastructure Opportunities Mapping<sup>1</sup> which provides details of the opportunities for GI within the identified zones. The site is located within *Zone 14: Colne Valley Area* the opportunities for this zone are as follows:

- Connectivity (e.g. opportunities to connect ancient Woodland), maintaining and enhancing biodiversity
- Public Access and recreation – opportunity to improve awareness
- Buffering (e.g. around the SSSI)

We welcome the aspiration to create a Nature Reserve at Alderbourne Farm. However, to align the development with the GI opportunities above, we would advise that connectivity between Black Park Country Park and the proposed nature reserve at Alderbourne Farm is considered. The Public Right of Way (PRoW) runs to the north boundary of Black Park. It appears from the Illustrative Masterplan (drawing No. 393-FBA-02-00-DR-A-01\_101) that the proposed development will block connectivity between Black Park and the Nature Reserve. It would be beneficial if public access could extend north into the proposed Nature Reserve through the landscaped area to the south west of Alderbourne Farm.

The GI buffer between Pinewood South and Black Park Country Park should ensure that the proposed development is appropriately screened from the Country Park.

In addition, it would be beneficial if the land manager of the new Nature Reserve could make themselves known to Natural England at the earliest possible eventuality, so that management of the nearby Black Park Country Park/SSSI can be considered so that both sites are managed in a mutually beneficial way.

### **Chilterns Area of Outstanding Natural Beauty (AONB) Proposed Extension**

The proposed development is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal.) Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. An assessment of the landscape and visual impacts of the proposal on this area should therefore be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with relevant development plan policies.

An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issue of the designation order by Natural England, but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight as a material consideration in planning decisions.

### **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 175 and 179 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<sup>2</sup>. 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.

We would not expect to provide further advice on the discharge of planning conditions or obligations attached to any planning permission. Should the proposal change, please consult us again.

### **Annex A – Additional Advice**

Natural England offers the following additional advice:

#### **Landscape**

Paragraph 174 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

#### **Best and most versatile agricultural land and soils**

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance. Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available

on [Gov.uk](https://www.gov.uk) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### **Protected Species**

Natural England has produced [standing advice](#)<sup>3</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Ancient woodland, ancient and veteran trees**

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Environmental gains**

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's Biodiversity Metric 3.1 may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the Small Sites Metric may be used. This is a simplified version of Biodiversity Metric 3.1 and is designed for use where certain criteria are met. It is available as a beta test version.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside Biodiversity Metric 3.1 and is available as a beta test version.

### **Access and Recreation**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

### **Rights of Way, Access land, Coastal access and National Trails**

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

### **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 – 13 January 2023**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated 01 September 2022. Reference number **404322**.

The advice provided in our previous response applies equally to this **amendment** The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

### **Parish Council – 16 August 2022**

Comment Reasons:

Comment: The Parish Council have noted the application and will supply full comments and its position at a later date. This will include possible section 106 mitigations should Buckinghamshire Council be minded to approve the application.

Comment Reasons: Comment: At this stage, I am not ready to provide a stance yet, but I would like to note a few important things.

1. The mitigations mentioned in the application, especially the Seven Bells Hill road improvements, should have exact dates when they will be started and finished and those dates should be as soon as possible. This will assuage local fears that these mitigations won't happen. Planning enforcement should get involved if the mitigations do not get started on time.

2. The buildings planned are not in keeping with the character of the local area, even for commercial buildings, and due to their height and closeness to Black Park, should be reconsidered. Every local plan created in the local area says new buildings should be in line with local character.

3. Ivy and/or other types of living walls should be on the side of studio buildings and multi-storey car parks to

- a. mitigate the destruction of the openness of the Green Belt
- b. improve biodiversity
- c. improve energy efficiency, lowering the carbon footprint of new buildings while saving Pinewood Studios money

According to multiple studies, ivy can make walls 3oC warmer in winter and 3oC cooler in summer while mitigating pollution as well. It is greatly underestimated in its effect and is very quick and easy to install.

4. The objectives of the application should be balanced with the requirements of Green Belt law, the strain on local roads and the requirements for new housing that a large commercial development would have on the Green Belt. There could be a fair compromise in which not all studios would be built, but enough for Pinewood Studios to reach some of their legitimate commercial goals.

### **Highways & Technical Services (Strategic Access) – 29 November 2022**

#### **PART A - Alderbourne Farm**

The Biodiversity and Green Infrastructure paper indicates with stock photos an aspiration to provide off-road walking and cycling in woodland or wetland settings along wide surfaced tracks [Extracts 1 and 2].



**Extract 1** – from *Biodiversity and Green Infrastructure paper*.





**Extract 2** – from *Biodiversity and Green Infrastructure paper*.

The Alderbourne Farm opportunities plan [p. 8] indicates gravel footpaths. The stock photo on p.9 indicates an aspirational surfaced route with good width [Extract 3].



**Extract 3** – from *Biodiversity and Green Infrastructure paper* [p.9].

The delivery arrangements for the nature reserve are included within the agent's response to the CVRP comments, copied below:

3.11 The arrangements for the nature reserve are still in preparation but the principles are being shared with interested parties and those responding to requests from the applicant to join the discussion/consultation events where such matters could be raised.

3.12 The proposed organisational and delivery structure is a creation of a charitable land trust with broad community and representative body membership to accept the

ownership of the site and deliver the reserve with assured funding from Pinewood Studios.

3.13 The requirements of the trust would be to:

- Maintain and manage the reserve primarily for nature conservation with passive public access/recreation
- Deliver the proposed BNG
- Operate in an inclusive way with community involvement

3.14 These requirements are to be included in a S106 agreement between the applicant and Buckinghamshire Council with input from local groups/bodies/representatives. Work on a constitution is taking place.

3.15 The precise layout and use of the reserve would be the responsibility of the trust within the legal requirements of their originating deed as proposed by Pinewood Studios and enshrined in any planning permission.

3.16 The concerns of the CVRP are therefore misconceived. The comments on the detailed layout are premature. The 'requirements' of the CVRP as listed on page 3 of the objections are not.

Notwithstanding para 3.15 and 3.16 with respect to layout, the outline extent of the permissive paths are illustrated in the Landscape Plan [Extract 4]. Details to be agreed later



**Extract 4** – from Landscape Plan

Granting wider pedestrian access that connects to the existing rights of way and permissive path network is a clear benefit of the application. The routes appear largely recreational in nature, thus complimenting the access element of wider green infrastructure networks.

In note para 3.16 stating detailed layouts are premature, but hopefully the following is helpful.

With reference to the Green Infrastructure Plan [Extract 5] it would be useful if the route I annotate orange and label 1, connected more directly to Black Park's bridleway network, for continuous off-road access. At present route 1 ends north of 1-4 Springfield Cottages, returning users to make the 133m connection to Black Park along the road. Ideally, this would emerge at the junction of Alderbourne Lane and Fulmer Common Road, with a connection onto the bridleway in Black Park [blue dots on Extract 5]. There may be a good reason why the route cannot pass to the north and east of 1-4 Springfield Cottages, partly utilising the Alderbourne Farm access track, but it would remove walkers off the road and provide a safer alternative.



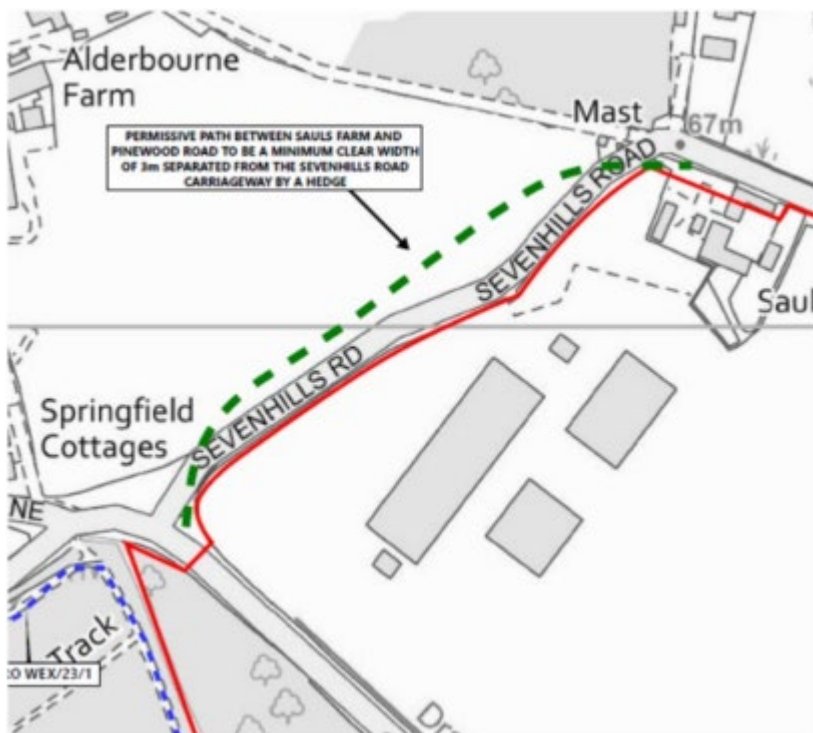
**Extract 5** – from *Green Infrastructure Plan*

My route 2 [Extract 5] connects with the frontage of Field Lodge opposite Saul's Farm on Seven Hills Road and the wider permissive path network provided by Pinewood. This is east of point B on Extract 4 and shown more widely by the permissive footpaths secured through the Pinewood east s106 Agreement, illustrated on Extract 6, with a later amendment on Extract 7. This is welcome.





**Extract 6** –PSDF Public Access Routes Plan [from a previous application - iTransport ITL16184]



**Extract 7** –PSDF Public Access Routes Plan [from a previous application]

The routes highlighted orange in Extract 5 would seem to benefit from being shared footpaths and cycleways rather than walking routes only, allowing users off-road choices that avoid parts of Seven Hills Road and Alderbourne Lane, should they wish to do so. Illustrative photos [Extract 2 above] indicate the intention to include cyclists, but it would be helpful to clarify.

Even though the car park may have restricted opening times, it would improve the local amenity to allow walkers and cyclists temporal access that goes some way near to or matching, and thus complementing, the 24/7 access secured in previous s.106 Agreements [Extracts 6 & 7].

Para 3.11 - 3.16 above indicates details are still emerging on access, but you may wish to seek some control of the permissive arrangements by securing walking and cycling access routes and opening times within the s106 Agreement.

## **PART B - Pinewood South**

### Peace Path

This route is within the control of the applicant. It is situated between the existing Pinewood Road cycleway and the bridleways and permissive cycling network within Black Park. The screen industries global growth hub application [PL/20/3280/OA] proposed removing this route, so retaining it is very welcome. It provides an important east to west connection for non-motorised users, albeit with restricted opening times.

Nevertheless, I would suggest the existing permission is upgraded to allow cycling. This would improve route choices, potentially reducing recreational car trips from Iver Heath to Black Park, which in turn boosts health and well-being. It would also benefit cycle trips to the northern area of Iver Heath from communities within Wexham, Wexham Street, George Green and Slough, benefitting local residents impacted by the development.

In order to facilitate walking and cycling to Black Park, I'd recommend a 3m-wide surface improvement to the Peace Path, such as bitumen or KBI Flexipave [with a lower carbon footprint]. A wider path would also improve the feel and confidence for walkers, with the existing corridor flanked closely by high security fences.

I note the agent's reply to the CVRP response states there is no intention to resurface the Peace Path, but in light of the absence of cycling facilities along the Uxbridge Road [A412] and intimidating on-road conditions for cyclists west of Five Points Roundabout, any improvements for cyclists travelling in an east to west direction should be encouraged.

### **Supporting Policy**

#### CP7 - South Bucks District Council Core Strategy Policy

Targets the 'Number of measures completed that improve transport choice and provide a safe and attractive environment for pedestrians and cyclists'.

#### Para 104[c] NPPF 2021

'Opportunities to promote walking, cycling and public transport use are identified and pursued'.

#### Para 100 NPPF 2021

'Protect and enhance public rights of way and access by...taking opportunities to provide better facilities for users'...and by... 'adding links to existing rights of way'.

#### Local Transport Plan 4

Policy 12 and 23 encourage walking and cycling.

#### Buckinghamshire Rights of Way improvement Plan 2020 – 2030

Aims to improve a fragmented bridleway network.

### **Other strategies**

#### Colne and Crane Valleys Green Infrastructure Plan 2020

Focuses on 'improved pedestrian and cycling accessibility' and 'boosting health and well-being'.

#### Active Travel In The Ivers Parish [Iver Parish Council]

Supports expanding the walking and cycling network and identifies 'key route' improvements for non-motorised users.

### **Strategic Access – Highways & Technical Services – 22 December 2022**

Thank you for your letter of 21st December 2022 with regard to:

*Additional and amended information submitted and changes to the description of the proposed development.*

I have no further comments from a rights of way perspective.

### **Strategic Environmental Protection Team – 11 October 2022**

#### **Air Quality Comments**

Thank you for consulting us on the proposed development outlined above. I have no comments to make with regards to air quality.

There are concerns about the potential air quality impacts of cumulative developments in the Ivers as many individual schemes, deemed insignificant in themselves, are potentially contributing to a "creeping baseline". There is a concern that in combination the emissions of local planning developments and the National Infrastructure Projects could result in a significant increase in NO<sub>2</sub> concentrations in Iver and also contribute towards an increase in particulate matter. The Air Quality Action Plan for the Iver contains a number of measures that should reduce NO<sub>2</sub> concentrations in Iver Parish. The council are requesting a financial contribution from all developments that increase concentrations within the Iver area regardless of magnitude to offset the increase and prevent baseline creep.

A condition requesting a Construction Environmental Management Plan (CEMP) as recommended in paragraph 11.10. This CEMP will be informed by the assessment completed in Appendix 11.2 and follows the IAQM demolition and construction guidance to determine the mitigation measures required. As recommended in paragraph 11.12 the appropriate emission standards for NRMM taken from EU Regulation 2016/1628xxi will be incorporated into the CEMP.

*This memo only includes comments relating to air quality. No other environmental health matters are covered. Where relevant, these comments will be provided separately.*

## **Lead Local Flood Authority– 31 August 2022**

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

- Pinewood South Flood Risk Assessment and Drainage Strategy (May 2022, Civic Engineers)
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy (May 2022, Civic Engineers)

The LLFA requests further information prior to the determination of the above proposals.

As described in the proposal above, the planning application covers two separate locations, Pinewood South and Alderbourne Farm which are accompanied by two separate site-specific flood risk assessments (FRA). Therefore for ease of reference, these areas will be assessed in turn.

### **Pinewood South**

#### ***Surface water flood risk***

The FRA provides an extract of the Risk of Flooding from Surface Water which indicates that parts of the site lie 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 former quarry with some areas of remediation ongoing 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. The FRA (4.7.7) suggests that the surface water flooding identified on the national mapping is due to the historic land use and low spots within the site. In order to further investigate this, the FRA refers to an Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) which was produced using topographical data to show the changes in site levels and surface water flow pathways. The FRA states that Drawing no. 1278-01-XX-XX-SK-D-1001-P01 indicates the absence of off-site flow routes passing through the site area. However, the Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) has not been included for review under this proposal. I request that the FRA is updated to include all referred to plans and drawings.

#### ***Groundwater flood risk***

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. The FRA (4.4.2) states that water level recorded in the boreholes on the site showed a groundwater level of between 3m and 4m below ground level. The ground investigations report has not been provided for review under this proposal. I request that the FRA is updated to include the

ground investigations report. Please note, that further investigations, such as groundwater monitoring should take place prior to detailed design.

### ***Surface Water Drainage***

The FRA does not examine the different methods of surface water disposal set out in the drainage hierarchy, instead the FRA sets out that surface water runoff will be discharge via four surface water outfalls to a watercourse at a rate of 1.7l/s/ha (equivalent of 54l/s for the total site area). The FRA should be amended to include commentary on the infiltration potential for the site and set out that infiltration rate testing in accordance with BRE 365 should be conducted prior to a detailed surface water drainage strategy design.

The FRA refers to an Existing Catchment Plan (drawing no. 1278.01-CIV-XX-XX-DR-D-1001-P01) which shows five catchments within the existing site. This plan is supposed to be contained within Appendix C but it does not appear to have been included. Catchments are referenced within the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02) but it is not clear if these align to the five existing drainage catchments referenced above.

The FRA (5.3.2) sets out that 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 noted that due to site topography, it may be necessary for surface water flows to be pumped to the point of outfall. I wish to remind the applicant that the Nonstatutory technical standards for SuDS (Defra, 2015) advises that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

The National Planning Policy Framework (Para. 167) requires that planning applications demonstrate that any residual risk (such as pump failure) can be safely managed. At detailed design, technical details on pump maintenance and details of exceedance routes in the event of failure, blockage or a rainfall event that exceeds the provided storage must be provided. In addition, I request that sufficient storage is provided and an inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station.

It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Indicative storage requirements for the four catchments are set out in Table 4. From the figures provided in Table 4, it is noted that the total storage available through the provision of attenuation storage and permeable paving exceeds the required storage volumes by 765m<sup>3</sup>. Please note, that new climate change allowances for rainfall intensity were published in May 2022, for development with a lifetime beyond 2100, flood risk assessment should assess the upper end allowances for both the 1% and 3.3% AEP for the 2070s epoch (2061 to 2125). Applicants should design their proposals for the 1% AEP event so that there is no increase in flood risk elsewhere and that the development is safe from



surface water flooding. In light of this guidance, calculations must be submitted for the 3.3% AEP with an allowance for climate change.

Attenuation will provide in strategic swales/basins/ponds and permeable paving across the site as shown on the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001- P02). I have concerns with the proposed design parameters of the swales and basins. The majority of the proposed swales across the Pinewood South site, have proposed side slopes of 1:2 and design depths of 1.5 to 1.7m. In line with best practice guidance, the maximum side slopes must be 1 in 3, however, 1 in 5 slopes are preferred for maintenance access. In addition, a swale depth of greater than 1m is not acceptable. Therefore, revisions are required to the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02). Similarly, basin side slopes of 1 in 2 are not acceptable and again should be amended to have a maximum side slope of 1 in 3, with 1 in 5 slopes in areas for maintenance access. The maximum depth of water for basins should not normally exceed 2m in the most extreme design event. I advise that the overall design of the basin should be natural in shape, with topography and vegetation that reflect the landscape and enhance the character of the area. Therefore, revisions are required to the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02).

There is an opportunity to incorporate further source control SuDS, such as green roofs and green walls, along with small scale SuDS with the proposed parking areas, these include rain gardens and bio-retention areas. Source control SuDS can assist in diversifying the landscape and introducing additional green-blue infrastructure within the site. I would encourage for further opportunities for SuDS to be investigated at this stage.

### **Aldbourn Farm**

#### ***Surface Water Flood Risk***

The Flood Map for Surface Water (FMfSW) provided by the Environment Agency shows that the eastern central area is at high risk of surface water flooding (meaning there is greater than 3.3% likelihood of flooding occurring in a given year). For the medium water flooding event the extent of the flooding extends west further into the site and during a low risk surface water flood event surface water flooding is shown to extend across the whole of the centre of the site. The surface water flooding is associated with the Aldbourne, a Main River, which flows through the centre of the site, west to east. An online version of this mapping data is available to view through the Environment Agency's Long term flood risk information mapping.

#### ***Groundwater Flood Risk***

The Groundwater Flood Map (Jeremy Benn Associates, 2016) shows the groundwater level in the area of the proposed development to be at within 5m of the ground surface for a 1 in 100 year return period. This means that flooding from groundwater is not likely.

#### ***Main River and Fluvial Flood Risk***

Whilst not within the remit of the LLFA, we would like to highlight that due to the presence of the Aldbourne the central section of the proposed nature reserve is within Flood Zone 2 and 3.

It should be noted that watercourse mapping identifies a section of the Alderbourne as culverted, however, during a site visit a culvert could not be located. The Topographic Survey (LT/222/0013/P/0001, 04/05/2022, Warner Surveys) does not extend as far as the Alderbourne and therefore it is not clear if there is a culvert located onsite. The LLFA require confirmation of if there is a culvert present. In the event of a culvert, the LLFA strongly recommend that it is opened. This may require an Environmental Permit from the Environment Agency; further information can be found in the informative at the end of this letter.

***Additional Comments on Flood Risk***

As described above the central area of the site is at risk of surface water and fluvial flooding, however it should be noted that no development is proposed in this area, instead this area has been proposed as a nature reserve.

***Surface Water Drainage***

Surface water runoff generated by the proposed backlot area will be discharged into an ordinary watercourse which flows into the Alderbourne at the greenfield runoff rate of 8.73l/s. It should be noted that to make a connection to this watercourse, consent may be required from the LLFA, further details are provided in an informative below.

The Planning Practice Guidance (Paragraph 080) outlines a drainage hierarchy from which applicants should aim to discharge surface runoff as high up the hierarchy as reasonably practicable:

- into the ground (infiltration);
- to a surface water body;
- to a surface water sewer, highway drain, or another drainage system;
- to a combined sewer.

It has been stated that infiltration may not be viable in some areas of the site due to previous land use, however there may be areas that can infiltrate. To provide evidence that the drainage hierarchy has been followed infiltration rate testing must be completed in accordance with BRE365. Tests must be completed a minimum of three times and water should drain until nearly empty. The time taken for the trial pit to drain from 75% full to 25% full is then used to calculate the infiltration rate. The worst calculated rate from the three tests is then used to inform the storage calculations. If testing demonstrates that infiltration is viable, the surface water drainage scheme must be updated to incorporate infiltration.

It is proposed to store surface water runoff generated by the backlot in a large pond to the north of the backlot, whilst the proposal meets the four pillars of SuDS, water quality, water quantity, amenity and biodiversity the LLFA are disappointed with a 'pipe to pond' solution. The Proposed Surface Water Drainage Strategy (1278-03-CIV-XX-XX-D-C-30001 Revision P02, 07/07/2022, Civic Engineers) shows embankments proposed around the pond, an indicative cross section of the pond is required to provide details of the height of the proposed embankments.

The surface water drainage scheme should be designed to be more sympathetic to the proposed nature reserve, this could be done by incorporating a smaller ponds and wetlands. Incorporating a 'cascade' of wetlands and ponds would provide a range of habitats. The incorporating of smaller wetlands and ponds would also remove the need for a large embankments.

The Proposed Surface Water Drainage Strategy shows car parking areas within the Backlot, as a minimum the LLFA would expect the car parking spaces to be constructed with permeable materials, this would provide additional water quality treatment as well as storage. In areas where infiltration is not viable tanked permeable paving can be utilised.

Calculations are required which 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 40% climate change storm event should be safely contained on site. These calculations must include details of critical storm durations and demonstrate how the proposed system as a whole will function during different storm events. If any flooding occurs for the 1 in 100 year plus 40% climate change event, then we require details of where this flooding will occur and the volume of the flooding.

A maintenance schedule for the surface water drainage system needs to be provided. It should include the maintenance tasks which are required, the persons responsible for undertaking maintenance and frequency by which these will be undertaken.

#### **Advice to LPA**

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

#### **Informatives**

##### ***Connection to Ordinary Watercourse***

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.

##### ***Works on Main Rivers***

Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, this development will require an Environmental Permit from the Environment Agency for connections to a main river. The applicant is advised to contact the Environment Agency for further information.

#### **Lead Local Flood Authority – 10 November 2022**

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

- Technical Note – LLFA Response (ref. 1278-01/03, Civic Engineers)
- Pinewood South Flood Risk Assessment and Drainage Strategy (September 2022, Civic Engineers)
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy (September 2022, Civic Engineers)

The LLFA requests further information prior to the determination of the above proposals.

As described in the proposal above, the planning application covers two separate locations, Pinewood South and Alderbourne Farm which are accompanied by two separate site-specific flood risk assessments (FRA). For ease of reference, these areas will be assessed in turn.

## **Pinewood South**

### ***Surface water flood risk***

The FRA provides an extract of the Risk of Flooding from Surface Water which indicates that parts of the site lie 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 former quarry with some areas of remediation ongoing 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. The FRA (4.7.7) suggests that the surface water flooding identified on the national mapping is due to the historic land use and low spots within the site. In order to further investigate this, the FRA refers to an Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) which was produced using topographical data to show the changes in site levels and surface water flow pathways. The FRA states that Drawing no. 1278-01-XX-XX-SK-D-1001-P01 indicates the absence of off-site flow routes passing through the site area. The Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) has been included in the appendices but due to formatting is not viewable. I request that the FRA is updated to include an updated version of the drawing.

### ***Groundwater flood risk***

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. The FRA (4.4.2) states that water level recorded in the boreholes on the site showed a groundwater level of between 3m and 4m below ground level. The FRA has been updated to include four borehole logs from British Geology Survey records, to evidence the conclusions made around the groundwater levels. Please note, that further investigations, such as groundwater monitoring should take place prior to detailed design.

### ***Surface Water Drainage***

The FRA does not examine the different methods of surface water disposal set out in the drainage hierarchy, instead the FRA sets out that surface water runoff will be discharge via four surface water outfalls to a watercourse at a rate of 1.7l/s/ha (equivalent of 54l/s for the total site area).

The FRA refers to an Existing Catchment Plan (drawing no. 1278.01-CIV-XX-XX-DR-D-1001-P01) which shows five catchments within the existing site. This plan has been included in the appendices but due to formatting is not viewable. I request that the FRA is updated to include an updated version of the plan. Catchments are referenced within the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001-P02) but it is not clear if these align to the five existing drainage catchments referenced above.

The FRA (5.3.2) sets out that 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 noted that due to site topography, it may be necessary for surface water flows to be pumped to the point of outfall. I wish to remind the applicant that the Nonstatutory technical standards for SuDS (Defra, 2015) advises that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

The National Planning Policy Framework (Para. 167) requires that planning applications demonstrate that any residual risk (such as pump failure) can be safely managed. At detailed design, technical details on pump maintenance and details of exceedance routes in the event of failure, blockage or a rainfall event that exceeds the provided storage must be provided. In addition, I request that sufficient storage is provided and an inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station. The above requirements have been included within the FRA (5.8.8).

It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Indicative storage requirements for the four catchments are set out in Table 4. From the figures provided in Table 4, it is noted that the total storage available through the provision of attenuation storage and permeable paving exceeds the required storage volumes by 765m<sup>3</sup>. Please note, that new climate change allowances for rainfall intensity were published in May 2022, for development with a lifetime beyond 2100, flood risk assessment should assess the upper end allowances for both the 1% and 3.3% AEP for the 2070s epoch (2061 to 2125). Applicants should design their proposals for the 1% AEP event so that there is no increase in flood risk elsewhere and that the development is safe from surface water flooding. In light of this guidance, calculations must be submitted for the 3.3% AEP with an allowance for climate change. The technical note suggests that these calculations are contained in Appendix D but they appear to have been omitted.

Attenuation will be provided in strategic swales/basins/ponds and permeable paving across the site as shown on the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C30001-P02). I have concerns with the proposed design parameters of the swales and basins. The majority of the proposed swales across the Pinewood South site, have proposed side slopes of 1:2 and design depths of 1.5 to 1.7m. In line with best practice

guidance, the maximum side slopes must be 1 in 3, however, 1 in 5 slopes are preferred for maintenance access. In addition, a swale depth of greater than 1m is not acceptable.

The technical note refers to health and safety guidance within the CIRIA SuDS Manual to mitigate the design of the swales at detailed design. I wish to remind the applicant that as per the CIRIA SuDS Manual, 'Competent, best practice SuDS design should mean that health and safety risks are considered throughout the design process. The results should be that risks are reduced to acceptable levels by designing out hazards'. The FRA does not contain suitable justification to support the suggest design parameters of the swales. The outline planning applications provides the opportunity to establish acceptable design parameters for SuDS features in line with best practice and therefore, I require the Proposed Surface Water Drainage Layout (drawing no. 1278.01-CIV-XX-XX-D-C-30001- P02) to be amended in line with the CIRIA SuDS Manual. I advise that the overall design of the swales and basins should be natural in shape, with topography and vegetation that reflect the landscape and enhance the character of the area.

There is an opportunity to incorporate further source control SuDS, such as green roofs and green walls, along with small scale SuDS with the proposed parking areas, these include rain gardens and bio-retention areas. Source control SuDS can assist in diversifying the landscape and introducing additional green-blue infrastructure within the site. I would encourage for further opportunities for SuDS to be investigated at this stage.

#### **Alderbourne Farm**

##### ***Surface Water Flood Risk***

The Flood Map for Surface Water (FMfSW) provided by the Environment Agency shows that the eastern central area is at high risk of surface water flooding (meaning there is greater than 3.3% likelihood of flooding occurring in a given year). For the medium water flooding event the extent of the flooding extends west further into the site and during a low risk surface water flood event surface water flooding is shown to extend across the whole of the centre of the site. The surface water flooding is associated with the Alderbourne, a Main River, which flows through the centre of the site, west to east. An online version of this mapping data is available to view through the Environment Agency's [Long term flood risk information](#) mapping.

##### ***Groundwater Flood Risk***

The Groundwater Flood Map (Jeremy Benn Associates, 2016) shows the groundwater level in the area of the proposed development to be at within 5m of the ground surface for a 1 in 100 year return period. This means that flooding from groundwater is not likely.

##### ***Main River and Fluvial Flood Risk***

Whilst not within the remit of the LLFA, we would like to highlight that due to the presence of the Alderbourne the central section of the proposed nature reserve is within Flood Zone 2 and 3.

##### ***Additional Comments on Flood Risk***

As described above the central area of the site is at risk of surface water and fluvial flooding, however it should be noted that no development is proposed in this area, instead this area has been proposed as a nature reserve.

### ***Surface Water Drainage***

Surface water runoff generated by the proposed backlot area will be discharged into an ordinary watercourse which flows into the Alderbourne at the greenfield runoff rate of 8.73l/s. It should be noted that to make a connection to this watercourse, consent may be required from the LLFA, further details are provided in an informative below.

It is proposed to convey surface water runoff generated by the backlot using filter drains (where possible) to a large pond to the north of the backlot. Whilst the proposal meets the four pillars of SuDS, water quality, water quantity, amenity and biodiversity the LLFA are disappointed with the 'pipe to pond' solution as it does not integrate blue-green corridors throughout the site. The Proposed Surface Water Drainage Strategy (1278-03-CIV-XX-XX-D-C-30001 Revision P02, 07/07/2022, Civic Engineers) shows embankments proposed around the pond, an indicative cross section of the pond has been provided in Figure 7 to demonstrate the proposed height of the embankment, which is approximately 2.2m. In its current form, the pond will hold 4380m<sup>3</sup> above ground level and so there is a concern regarding the possible flood risk should the embankment be breached as no details of an overflow mechanism have been provided. Therefore, I wish to reiterate the previous comments around the required attenuation basin being provided in a number of smaller ponds both wet and dry.

The Proposed Surface Water Drainage Strategy shows car parking areas within the Backlot, as a minimum the LLFA would expect the car parking spaces to be constructed with permeable materials, this would provide additional water quality treatment as well as storage. In areas where infiltration is not viable tanked permeable paving can be utilised.

The Technical Note states that calculations have been provided for the 3.3% AEP plus climate change event within Appendix D. Having reviewed Appendix D, this scenario does not appear to have been included. I request that Appendix D is updated to include this information.

An indicative maintenance schedule for the surface water drainage system has been provided in the FRA 5.10, this will need to be updated should the surface water drainage scheme be amended with additional SuDS features.

### ***Connection to Ordinary Watercourse***

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.

### ***Works on Main Rivers***

Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, this development will require an Environmental Permit from the Environment Agency for connections to a main river. The applicant is advised to contact the Environment Agency for further information.

### **Lead Local Flood Authority – 16 December 2022**

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

- Technical Note – LLFA Response (ref. 1278-01/03, Civic Engineers)
- Pinewood South Flood Risk Assessment and Drainage Strategy (December 2022, Civic Engineers)
- Alderbourne Farm Flood Risk Assessment and Drainage Strategy (December 2022, 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.**

As described in the proposal above, the planning application covers two separate locations, Pinewood South and Alderbourne Farm which are accompanied by two separate site-specific flood risk assessments (FRA). For ease of reference, these areas will be assessed in turn.

#### **Pinewood South**

##### **Surface water flood risk**

The FRA provides an extract of the Risk of Flooding from Surface Water which indicates that parts of the site lie 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 former quarry with some areas of remediation ongoing 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. The FRA (4.7.7) suggests that the surface water flooding identified on the national mapping is due to the historic land use and low spots within the site. In order to further investigate this, the FRA refers to an Overland Flow Simulation/ Long-Term Flood Risk Comparison Plan (drawing no. 1278-01-XX-XX-SK-D-1001-P01) which was produced using topographical data to show the changes in site levels and surface water flow pathways. The 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. The drawing 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.

##### **Groundwater flood risk**

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. The FRA (4.4.2) states that water level recorded in the boreholes on the site showed a groundwater level of between 3m and 4m below ground level. The FRA has been updated to include four borehole logs from British Geology Survey records, to evidence the conclusions made around the groundwater levels. Please note, that further investigations, such as groundwater monitoring should take place prior to detailed design.

### ***Surface Water Drainage***

The FRA does not examine the different methods of surface water disposal set out in the drainage hierarchy, instead the FRA sets out that surface water runoff will be discharge via four surface water outfalls to a watercourse at a rate of 1.7l/s/ha (equivalent of 54l/s for the total site area).

The FRA refers to an Existing Catchment Plan (drawing no. 1278.01-CIV-XX-XX-DR-D-1001-P01) which shows five catchments within the existing site. The FRA (5.3.2) sets out that 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 noted that due to site topography, it may be necessary for surface water flows to be pumped to the point of outfall. I wish to remind the applicant that the Non-statutory technical standards for SuDS (Defra, 2015) advises that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

The National Planning Policy Framework (Para. 167) requires that planning applications demonstrate that any residual risk (such as pump failure) can be safely managed. At detailed design, technical details on pump maintenance and details of exceedance routes in the event of failure, blockage or a rainfall event that exceeds the provided storage must be provided. In addition, I request that sufficient storage is provided and an inclusion of a warning system in the event of a pump failure. We will also require a maintenance plan for the pumping station. The above requirements have been included within the FRA (5.8.8).

It is proposed to attenuate up to the 1 in 100 year storm event plus 40% climate change allowance. Indicative storage requirements for the four catchments are set out in Table 4. From the figures provided in Table 4, it is noted that the total storage available through the provision of attenuation storage and permeable paving exceeds the required storage volumes by 765m<sup>3</sup>. Please note, that new climate change allowances for rainfall intensity were published in May 2022, for development with a lifetime beyond 2100, flood risk assessment should assess the upper end allowances for both the 1% and 3.3% AEP for the 2070s epoch (2061 to 2125). Applicants should design their proposals for the 1% AEP event so that there is no increase in flood risk elsewhere and that the development is safe from surface water flooding. In light of this guidance, calculations must be submitted for the 3.3% AEP with an allowance for climate change. The technical note suggests that these calculations are contained in Appendix D but they appear to have been omitted. As the

drainage system will be attenuating surface water runoff up to the 1 in 100 year plus 40% allowance for climate change, this detail can be secured under a planning condition.

Following my previous consultation response, the FRA (5.4.11) has been amended to set out that where possible swales and will be designed to have a maximum depth of 1m and side slopes will be set at a gradient of 1 in 3. The detailed design will aim to create features that are more naturalistic in shape and the vegetation will reflect the landscape and enhance the character of the area. A note is also included on Drawing 1278-01-CIV-DR-30001-P02 30001 which mirrors the comments in 5.4.11 of the FRA.

There is an opportunity to incorporate further source control SuDS, such as green roofs and green walls, along with small scale SuDS with the proposed parking areas, these include rain gardens and bioretention areas. Source control SuDS can assist in diversifying the landscape and introducing additional green-blue infrastructure within the site.

## **Alderbourne Farm**

### ***Surface Water Flood Risk***

The Flood Map for Surface Water (FMfSW) provided by the Environment Agency shows that the eastern central area is at high risk of surface water flooding (meaning there is greater than 3.3% likelihood of flooding occurring in a given year). For the medium water flooding event the extent of the flooding extends west further into the site and during a low risk surface water flood event surface water flooding is shown to extend across the whole of the centre of the site. The surface water flooding is associated with the Alderbourne, a Main River, which flows through the centre of the site, west to east. An online version of this mapping data is available to view through the Environment Agency's [Long term flood risk information](#) mapping.

### ***Groundwater Flood Risk***

The Groundwater Flood Map (Jeremy Benn Associates, 2016) shows the groundwater level in the area of the proposed development to be at within 5m of the ground surface for a 1 in 100 year return period. This means that flooding from groundwater is not likely.

### ***Surface Water Drainage***

Surface water runoff generated by the proposed backlot area will be discharged into an ordinary watercourse which flows into the Alderbourne at the greenfield runoff rate of 8.73l/s. It should be noted that to make a connection to this watercourse, consent may be required from the LLFA, further details are provided in an informative below.

It is proposed to convey surface water runoff generated by the backlot using filter drains (where possible) to a large pond to the north of the backlot. Following my previous consultation response, the FRA (5.4.11) has been amended to set out that at detailed design opportunities will be explored to enhance the strategy by including a series of smaller SuDS features across the site area in combination with, or in lieu of, a larger basin as currently shown on Drawing no. 1278-03-CIV-XX-XX-D-C-30001. In addition, blue-green corridors will be developed through the site and source control measures (such as permeable paving) will

be implement where possible. A note is also included on Drawing 1278-03- CIV-XX-XX-D-C-30001 which mirrors the comments in 5.4.11 of the FRA.

The Technical Note states that calculations have been provided for the 3.3% AEP plus climate change event within Appendix D. Having reviewed Appendix D, this scenario does not appear to have been included. As the drainage system will be attenuating surface water runoff up to the 1 in 100 year plus 40% allowance for climate change, this detail can be secured under a planning condition.

An indicative maintenance schedule for the surface water drainage system has been provided in the FRA 5.10, this will need to be updated should the surface water drainage scheme be amended with additional SuDS features.

I would request the following condition(s) be placed on the approval of the application, should this be granted by the LPA:

### ***Pinewood South***

#### **Condition 1**

Development shall not begin until a surface water drainage scheme for Pinewood South site, based on Pinewood South Flood Risk Assessment and Drainage Strategy (December 2022, 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 SuDS components as listed in the CIRIA SuDS Manual (C753) and provide justification for exclusion if necessary
- 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
- Ground investigations including:
  - Infiltration in accordance with BRE365
  - Groundwater level monitoring over the winter period
- Where ground conditions permit, surface water drainage should be managed by infiltration-based SuDS.
- Where required, floatation calculations based on groundwater levels encountered during winter monitoring (November-March)
- SuDS components as set out in the FRA (5.4.11) and Drawing 1278-01-CIV-DR-30001-P02 30001
- Full construction details of all SuDS and drainage components
- 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:** 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 167 and 169 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

### **Condition 2**

Prior to occupation, 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) during and following construction, with details of who is to be responsible for carrying out the maintenance. The plan shall subsequently be implemented in accordance with the approved details.

**Reason:** The reason for this being a pre-start condition is to ensure that maintenance arrangements have been arranged and agreed before any works commence on site that might otherwise be left unaccounted for.

*NB: We would recommend that the “whole-life” maintenance and management plan for the surface water drainage system is secured by a Section 106 Planning Agreement. The use of a planning obligation (as opposed to a planning condition) would help to safeguard the maintenance and management of these features over the lifetime of the development. The BC Strategic Flood Management team are of the opinion that this is a reasonable approach due to the residual risk of surface water flooding to the site should the systems not be adequately maintained.*

### **Alderbourne Farm**

#### **Condition 1**

Development shall not begin until a surface water drainage scheme for Alderbourne Farm site, based on Alderbourne Farm Flood Risk Assessment and Drainage Strategy (December 2022, 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 SuDS components as listed in the CIRIA SuDS Manual (C753) and provide justification for exclusion if necessary
- 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 8.73l/s
- Ground investigations including:
  - Infiltration in accordance with BRE365
  - Groundwater level monitoring over the winter period
- Where ground conditions permit, surface water drainage should be managed by infiltration-based SuDS.
- Where required, floatation calculations based on groundwater levels encountered during winter monitoring (November-March)

- SuDS components as set out in the FRA (5.4.11) and Drawing no. 1278-03-CIV-XX-XX-D-C-30001
- Full construction details of all SuDS and drainage components
- 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:** 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 167 and 169 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

### **Condition 2**

Prior to occupation, 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) during and following construction, with details of who is to be responsible for carrying out the maintenance. The plan shall subsequently be implemented in accordance with the approved details.

**Reason:** The reason for this being a pre-start condition is to ensure that maintenance arrangements have been arranged and agreed before any works commence on site that might otherwise be left unaccounted for.

*NB: We would recommend that the “whole-life” maintenance and management plan for the surface water drainage system is secured by a Section 106 Planning Agreement. The use of a planning obligation (as opposed to a planning condition) would help to safeguard the maintenance and management of these features over the lifetime of the development. The BC Strategic Flood Management team are of the opinion that this is a reasonable approach due to the residual risk of surface water flooding to the site should the systems not be adequately maintained.*

### **Informative**

#### ***Connection to Ordinary Watercourse***

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.

**Thames Water – 30 August 2022**

### **Waste Comments**

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

### **Water Comments**

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

### **Supplementary Comments**

No documentation containing confirmed details of the proposed surface water drainage plan could be located on the Local Authority website. For Thames Water to determine whether the existing sewer network has sufficient spare capacity to receive the increased flows from the proposed development, a drainage strategy must be submitted detailing the surface water strategies. Details of any proposed connection points or alterations to the public system, including calculated discharge rates (pre and post development) must be included in the drainage strategy. If initial investigations conclude that the existing sewer network is unlikely to be able to support the demand anticipated from this development, it will be necessary for the developer to fund an Impact Study.

Surface Water requirement: In accordance with the Building Act 2000 clause H3.3. Positive connection to a public surface water will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. The disposal hierarchy being; - 1st Soakaways; 2nd Watercourses; 3rd Sewer

### **Thames Water – 31 October 2022**

#### **Waste Comments**

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. “The development shall not be occupied until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.” Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought

from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

### **Water Comments**

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

### **Thames Water – 29 December 2022**

We write in response to the letter sent by Turley, on behalf of Pinewood Group Limited, on 17 November 2022 responding to the revised consultation response from Thames Water Utilities Limited (“TWUL”).

The letter encloses an opinion from Clyde & Co (“the Opinion”) advising that the planning condition sought by TWUL would be unreasonable to impose on any planning permission granted pursuant to the Planning Application and that an informative should instead be included. TWUL disagrees with that conclusion for the following reasons.

#### **1. The case law position**

- 1.1. The Opinion references a number of case law decisions as support for the conclusion reached. TWUL respectfully disagrees with the analysis put forward in respect of these cases<sup>1</sup>. In particular:
- 1.2. *Appeal decision reference number APP/Q5300/W/21/3276466 dated 30 March 2022* – TWUL notes that this quote included within the Opinion does not appear to be included within the decision letter nor is this issue discussed as part of that letter and so TWUL is unable to comment further on the circumstances in which this comment was made. TWUL would highlight that it did not participate in the public inquiry and was therefore not given the opportunity to comment on the Inspector’s findings or put forward an explanation as to why the condition was necessary.
- 1.3. *Grampian Regional Council v Secretary of State for Scotland and City of Aberdeen District Council 1984 SC (HL) 58* – The decision confirms that there is a distinction between a positive condition attached to planning permission requiring an applicant to bring about some circumstance outside of their control and a negative condition that the development should not commence until such an event has occurred, in that only the latter was enforceable and that the reasonableness of such a condition must be considered in the circumstances of the case.
- 1.4. In TWUL’s view, this case is directly relevant to the condition sought in relation to the Planning Application in that the condition is negatively worded and the applicant has the ability to agree a development and infrastructure phasing plan with the Council in consultation with TWUL.



- 1.5. *Mouchell Superannuation Fund Trustees and another v Oxfordshire County Council [1992] 1 PLR 97* – The case involved a positively worded condition requiring all access to be taken from a specified road and for works to be carried out to improve access arrangements in respect of that road, which was not included within red line boundary of planning consent nor in control of the applicant. The condition was held to be unenforceable because the applicant could not require all incoming traffic to use that road, making compliance impossible, and secondly the condition regarding improvement was something outside of the applicant’s control and was positively worded so could not be a Grampian condition.
  - 1.6. *Davenport and Davenport v Hammersmith and Fulham London Borough Council (1999) 78 P. & C.R. 421* – The case involved the enforceability of a planning condition requiring that: “No vehicles which have been left with or are in the control of the applicant shall be stored or parked in Tasso Road.” Tasso road was a public highway and was outside the application site. It was held that it was permissible to have granted consent subject to a condition which applied to land outside of the application site however, here the condition was found to be invalid because it was not a condition regulating the use of the relevant land and therefore could not be enforced.
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1. TWUL has been unable to obtain a copy of appeal decision reference number APP/N3210/A/08/2064447 dated 15 July 2008 from the Planning Inspectorate website and so unable to comment further on this case. However, we note this Inspector’s decision pre-dated the Barratt case cited below

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2. In TWUL’s view, the conditions imposed in both the Mouchell and Davenport cases are not comparable to TWUL’s proposed condition in relation to the Planning Application as (1) the proposed condition is not a positively worded condition and (2) the proposed condition does regulate the use of the relevant land in that it prevents occupation of the development until the condition has been satisfied. Accordingly, these two cases do not appear to be analogous to the position here

### **3. Section 106 of the Water Industry Act 1991 (“the WIA”)**

3.1 Section 106 of the WIA provides a right to connect to an undertaker’s sewerage system.

3.2 *In the case of Barratt Homes Ltd v DWR Cymru Cyfyngedig (Welsh Water) [2009] 1 EGLR 55*, the developer sought to use section 106 to connect into an existing sewer at the point nearest its development. Between that point and the sewage treatment plant there was a section of the existing network that was restricted and it was agreed by all parties that it simply would not cope with the extra demands that the new development would place upon it.

3.3 Accordingly, the water undertaker sought to argue that the developer could be required to connect to a different section of the sewer which did not have a capacity issue.

However, the Court held that there was very little ability to require a connection to be made at a certain point and emphasised the role of the planning system in moderating the impact of the absolute right to connect given by the legislation. They emphasised that local planning authorities will often consult with water companies when dealing with planning applications and should, where appropriate, impose Grampian conditions preventing development from starting until an acceptable drainage scheme has been submitted:

*“A responsible planning authority would normally refuse planning permission until satisfied that drainage requirements can be resolved to the satisfaction of the relevant authorities. If off-site works are required, it may impose a condition or require an agreement to ensure that they are carried out at the expense of the developer”* (paragraph 47).

3.4 As such, it is not correct to say that the legal mechanism set out in section 106 of the WIA is intended to be distinct and separate from planning legislation and outside of the responsibility of a local planning authority when determining an application. It is not the case that TWUL can seek to do so outside of the planning process as the *Barratt Homes* case clearly illustrates and it is clear from that case that planning conditions will be essential where there is a need to control connection requests arising from new development, given TWUL’s limited ability to do within the confines of section 106 of the WIA.

3.5 Additionally, we would just note that in terms of the funding arrangements for the requisite upgrades, infrastructure charges are made for the additional demand that each new connection puts on the capacity of the water supply and sewerage systems; such charges will be collected at the point of connection.

#### **4. The ‘six tests’ specified in paragraph 56 of the NPPF.**

4.1. Paragraph 56 of the National Planning Policy Framework sets out that *“Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.”*

4.2. Having reviewed the proposed condition, TWUL remains of the view that each of these tests are satisfied:

4.2.1. *Necessary* - Whilst there is a separate statutory regime governing the provision of clean and foul water infrastructure, i.e. under the WIA, this Act does not impose conditions on developments to ensure the development does not adversely impact on the existing network capacity etc., with which all applicants are required to comply in all cases.

Similarly there is a separate regime governing highways issues under the Highways Act 1980 but, for example, it is entirely normal for a local planning

authority to impose planning conditions restricting occupation of a development until certain highway improvements have been carried out. The principle is no different here: it remains a function of the local planning authority to ensure that the development's impacts are adequately mitigated as part of the planning process and as such, the proposed condition will be necessary to achieve that.

- 4.2.2. Relevant to planning and to the development to be permitted - the Standard Conditions are clearly relevant to planning and to the development being considered, as they seek to address the impact of the particular development on TWULs network capacity.
- 4.2.3. Enforceable – As noted above, given that the proposed condition is negatively worded and reasonable in the context of the development given the need to control connection requests made under section 106 of the WIA, the proposed condition is enforceable by the Council.
- 4.2.4. Precise – The proposed condition clearly sets out the steps required for the condition to be discharged and so as to ensure the foul water connection is properly managed.
- 4.2.5. Reasonable in all other respects – As was confirmed in the Barratt Homes case referred to above, the planning system has a key role in moderating the impact of the absolute right to connect given by section 106 of the WIA, and where (as is the case here) off-site works are required, it would be reasonable to expect that a responsible planning authority would impose such a condition. As such, in TWUL's opinion, the condition requested is reasonable to impose.
- 4.2.6. Accordingly, the condition request is not contrary to the policy position and guidance as to the use of conditions.

For the reasons outlined above, TWUL therefore respectfully requests that any planning permission granted pursuant to the Planning Application incorporates its proposed condition.

## **Thames Water – 4 January 2023**

### **Waste Comments**

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan



## **The Gardens Trust – 23 August 2022**

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this joint response.

We have looked at the online documentation, and although the Heritage Statement does reference Heatherden Hall, it specifically states that it has excluded Langley Park as the proposed development will not be visible and will *'not distract from, or undermine, the appreciation of the significance of the significance of Langley Park (and associated reciprocal relationships to the built Research - Conserve - Campaign heritage assets it contains) or materially reduce an understanding of its siting with a prevailing rural context.'*

The GT/BGT consider that it is totally inappropriate for the applicant to exclude heritage sites situated so closely, and it is essential that we are given the opportunity to understand how the above application relates to previous proposals for development at Pinewood.

Your officers will be familiar with The Setting of Heritage Assets Historic Environment Good Practice Advice in *Planning Note 3 (Second Edition) pub, 2nd Dec 2017 Part 1 – Settings and Views*. (SHA). On p2 it states :*' The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.'* It goes on to say (p2) : *'When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'* and (p5) *'While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary.'*

We ask that your officers request clarification from the applicants as to the relationship of this application to those previously made. Whilst this information may be contained in the documentation, our County Trusts are volunteers who have a large number of applications to consider so this information will be very helpful.

In the interim we wish to submit an objection until we are able to fully assess the potential impact upon Langley Park.

## **The Gardens Trust – 9 September 2022**

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this joint response.

We previously issued an interim objection dated August 23rd 2022 on the grounds that we considered the application excluded Langley Park from its heritage assessment. We asked that your officers request clarification from the applicants as to the relationship of this application to those previously made and, whilst we acknowledged that this information may be contained in the documentation, we pointed out that our County Trusts are volunteers who have a large number of applications to consider so this information will be very helpful.

We have since received a letter dated 24th August 2022 from Sara Dutfield on behalf of Turley which helpfully clarifies that the previous scheme has received planning consent and that, in assessing the previous scheme, the Heritage Officer confirmed; "*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.*"

We are content therefore to withdraw our interim objection to this scheme on the grounds that the Planning Authority consider there is no impact on Langley Park.

### **Trees Officer – 11 August 2022**

The site is subject to two Woodland Orders known as no.03, 1950. Also Brown's Wood and Hawks Wood are classified as Ancient Woodland (AW). The Forestry Commission and Woodland Trust is a non-statutory consultee on developments in or within 500m of an AW <https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.forestry.gov.uk%2Fforestry%2Finfo%2F98uh7n&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=gR1blwcu fCZgQG DY0usS%2FmQB1CSv5LqU1YnIPmfJOP4%3D&reserved=0>. Joint standing advice by FC and NE can be found on the following link

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fancient-woodland-and-veteran-trees-protection-surveyslicences&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=jct%2Bqwfq%2FEXFwmF8JiUdx41cmLeF%2FKukyG52k8w%2FV4U%3D&reserved=0>

Joint standing advice by FC and NE can be found on the following link <https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fancient-woodland-and-veteran-trees-protection-surveyslicences&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=jct%2Bqwfq%2FEXFwmF8JiUdx41cmLeF%2FKukyG52k8w%2FV4U%3D&reserved=0>

Joint standing advice by FC and NE can be found on the following link <https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fancient-woodland-and-veteran-trees-protection-surveyslicences&data=05%7C01%7Cplanning.comments.cs%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=jct%2Bqwfq%2FEXFwmF8JiUdx41cmLeF%2FKukyG52k8w%2FV4U%3D&reserved=0> which outlines what LPA's should consider when development is near ancient woodland or/and veteran

trees. If the FC is consulted the following link provides Forestry Commission Area Office contact details

<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.forestry.gov.uk%2Fenglandareas&data=05%7C01%7Cplanning.comments.csb%40buckinghamshire.gov.uk%7C4efdb4a0564740c0d55108da7ba7426e%7C7fb976b99e2848e180861ddabecf82a0%7C0%7C0%7C637958255548927020%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjojV2luMzliLCJBTiI6Ikk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=cjqD0rKHsM2Mk5JyValqTcXi66cHdgEgAG3Vki9QY%2Fk%3D&reserved=0.>

There has been a lot of deliberation by government on the required buffer distance from AW as part of the Environment Bill which as far as I'm aware has still not be determined by Government. Currently buffers should exceed 15m+ but as mentioned an amendment to Environment Bill introduces an 'Ancient Woodland Standard' of 50m to prevent further losses so in line with NPPF (2021) paragraph 180c. This amendment has been passed in the Lords so is returning to the House of Commons for MPs to either accept, modify or reject so this would have implications on this proposal. Hopefully the FC and WT can give more information on this matter as buffer zones should consist of semi-natural habitats to help the council as well as applicant to consider implications of this application accordingly.

I have reviewed the submitted arboricultural report and TPP's by SJA Trees Arboricultural Planning Consultants (2022). It would be helpful for a site visit to take place with other internal specialists to assess the implications of this outline application, especially the retention and removal of trees now and in the future if planning permission was permitted for proposed development of the site to fully assess the arboricultural implications as described in the AIA.

### **Trees Officer – 6 September 2022**

Please refer to previous comments on the 11 August 2022 for reference and as you are aware visited site last week.

Tree Protection Plan drawings (Alderbourne Farm - TPP 22145-041) and (south - TPP 20319-041c) have been submitted illustrating trees to be retained and protected. Drawing also lists trees to be removed (20 trees, 8 hedgerows and 3 partially removed hedgerows by species and identification numbers). A summary report by SJA Trees has been submitted which states it is an assessment report in accordance of BS 5837 guidance of the arboricultural impacts of the proposed development. It includes a summary of arboricultural findings on both sites and I agree with paragraph 2.2.2 that mature oak trees nos. 153, 154, 159, 162, 165 and 168 are prominent landscape features as well as Black Park woodland and T27-T31. Paragraph 3.2.6 - 3.2.9 noted.

Appendix 2 has a outlined Arboricultural Method Statement (AMS) with tree surveys from 2020 (south - appendix 3) and 2022 (Alderbourne Farm - appendix 4).

If planning permission is permitted a suitable planning condition would be ST17.

### **Trees Officer – 22 December 2022**

No further comments to add following previous comments on the 6 September 2022 and 11 August 2022.

The WT and FC will hopefully clarify the current required buffer distance from AW as part of the Environment Bill which as far as I'm aware has still not been determined by Government. Buffer zones should consist of semi-natural habitats to help the council as well as applicant to consider implications of this application accordingly.

I note the WT objection (25 Nov 2022) to application that a larger buffer zone is required from the currently proposed 15m to 50m or for the car park to be relocated from adjacent AW. The WT objection is a material consideration for the council as they are joint authors of national standing advice to government in regards to AW buffers.

### **Waste Management – 22 December 2022**

We in waste consider this as commercial consultation and therefore we currently do not consult on commercial developments. We provide consultation for domestic residential settings only. We advise to source waste disposal from a private contractor.

### **Woodland Trust – 25 November 2022**

Thank you for consulting the Woodland Trust on the following application.

We hold concerns regarding the new car parks proposed on the Alderbourne Farm site, as they will be sited adjacent to Browns Wood ASNW (grid reference: TQ0163585340).

While we note that a buffer zone has been afforded to the ancient woodland, given the number of vehicle spaces proposed we consider that a larger buffer zone of 50 metres should be afforded to ensure that the woodland is not subject to adverse air quality impacts from vehicle emissions. If a suitable buffer cannot be implemented, the proposed parking should be re-located away from the ancient woodland boundary.

We wish to refer you to Natural England and Forestry Commission's standing advice which states the following: "*For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, **the effect of air pollution from development that results in a significant increase in traffic.***"

In summary, the Woodland Trust will be lodging a **holding objection** to the proposals until our concerns are addressed.

### **Michelle Bolger Landscape Review - November 2022 Executive Summary only**

#### **Introduction & Background**



1.1 Buckinghamshire Council have commissioned Michelle Bolger Expert Landscape Consultancy (MBELC) to review the landscape and visual impacts of planning application Ref: PL/22/2657/FA. This is a hybrid application which relates to two separate sites and development proposals:

- Alderbourne Farm - relates to 35.4 hectares (ha) of land at Alderbourne Farm where it is proposed to develop 2.9ha of 'backlots' (open air filming), replace existing farm buildings with film production buildings and change the use of 25.6 ha of agricultural land to create a nature reserve with new permissive footpaths.
- Pinewood South - relates to 32.6 ha of land south of Pinewood Studios West where it is proposed to develop buildings for film production, educational and business uses (total gross external area (GEA) 31,458m<sup>2</sup>), together with backlot, multistorey car parks, and green and blue infrastructure.

1.2 Existing development at Pinewood Studios is split by Pinewood Road (ES Figure 7.1). West of the road is the original development at Pinewood Studios West (approximately 45 ha). East of Pinewood Road and south of Seven Hills Road is Pinewood Studios East which was allowed at an appeal recovered for determination by the Secretary of State in 2014<sup>1</sup> and is mostly built out.

1.3 Pinewood South has an existing outline planning permission<sup>3</sup> for a visitor attraction, film production buildings, an education and business hub (total GEA 69,677m<sup>2</sup>). The decision issued by Buckinghamshire Council in 2021 refers to two alternative development layout options (A and B). For ease of comparison, Figures 1 to 3 appended to this review have been prepared to illustrate the differences between the consented options and the current proposals. The main difference is that the current proposals would almost double the provision for built form which would extend across a greater area within the site. Multistorey car parking is proposed instead of the consented surface level car parking which increases the area with potential for built form.

1.4 The proposed development at Alderbourne Farm was not part of the previously consented development. It is a new and separate development proposal (refer Figure 4).

#### Landscape Character Context

1.5 The two sites in the current application are located 1km apart<sup>4</sup> and separated by existing development at Pinewood Studios West. The Pinewood South site is located immediately south of Pinewood Studios West. The Alderbourne Farm site is located opposite the northern edge of Pinewood Studios West and Pinewood Studios East but is separated from them by Pinewood Road and Seven Hills Road. Both Alderbourne Farm and Pinewood South are located within the Green Belt and the Colne Valley Regional Park (CVRP) (ES Figure 7.2). The eastern edge of Black Park Country Park (BPCP) is the western boundary of Pinewood South<sup>5</sup> and Pinewood Studios West. The northernmost point of BPCP is opposite Alderbourne Farm.

1.6 Seven Hills Road marks the boundary between two different landscape types and landscape character areas (LCA) in the South Bucks District Landscape Character Assessment, 2011 (SBLCA 2011)6 (ES Figure 7.6).

- North of Seven Hills Road is an undulating 'river valley' landscape type and LCA 23.1: Alder Bourne River Valley. This is where Alderbourne Farm is located.
- South of Seven Hills Road is a broadly flat 'river terrace' landscape type and LCA 22.4: Iver Heath Mixed Used Terrace. This is where Pinewood South and the existing development at Pinewood Studios East and West are located.

#### Alderbourne Farm (Landscape Effects)

1.7 Unlike existing development at Pinewood Studios, the proposed development at Alderbourne Farm is located north of Seven Hills Road. Compared with existing development, the proposals would be located in:

- a different landscape character type.
- a different landscape character area.
- a different historic landscape character type.

1.8 Development at Alderbourne Farm would impact upon rural characteristics of the Alder

Bourne River Valley. It would be apparent that studio development had extended into the valley as the field closest to Seven Hills Road<sup>7</sup> on the upper valley side would be replaced with a substantial 2.4ha backlot. The proposals would diminish the sense of 'rural naturalness' which is a distinctive quality of the Alder Bourne River Valley. The development would also harm landscape and visual sensitivities identified for LCA 23.1, including the:

- Visual connectivity within the agricultural valley landscape.
- The sense of it being an intimate and contained valley.
- The variety of field enclosures, which provide time depth to the landscape.

1.9 The overall sensitivity of the local landscape to the changes proposed at Alderbourne Farm is medium/high. With a medium magnitude of change the overall effect upon the local landscape would be moderate/major adverse.

1.10. The proposed nature reserve would have a beneficial impact on the natural heritage and recreational qualities of the site through improved management and through the introduction of new permissive routes. It would be sympathetic to local landscape character and would achieve CVRP Purposes and the Strategy and Vision for LCA 23.1. It would also achieve objectives within the Colne Valley Regional Park Action Plan. However, the proposals for a nature reserve would not mitigate the harm described above.

#### Alderbourne Farm (Visual Effects)

1.11 Visual receptors most affected by the proposals at Alderbourne Farm would be:

- People on Seven Hills Rd and Alderbourne Ln. Up to Moderate adverse initially, potentially reducing to between negligible and minor/moderate adverse after 15 years).
- People within BPCP on the section of bridleway WEX/21/1 opposite the site. Moderate adverse initially, potentially reducing to minor adverse after 15 years).
- Residents within Springfield Cottages who have an outlook over the field in which it is proposed to locate Backlot A. Major adverse initially, potentially reducing to moderate/major adverse after 15 years

Pinewood South (Landscape Effects)

1.12 Pinewood South is located on a flat terrace immediately south of Pinewood Studios West. It is framed along its length to the east by Pinewood Road and to the west by BPCP. The site consists of grassy fields, restored following minerals extraction and subsequent inert landfilling. Although the SBLCA 2011 describes LCA 22.4 as a 'discordant landscape which often lacks unity'<sup>8</sup>, there is a strong sense of unity at Pinewood South due to the:

- long, straight, and consistent edges created by Pinewood Road and BPCP;
- the constant wooded background when viewed from Pinewood Road; and
- flat open grassy fields which occupy the site.

1.13 When travelling along Pinewood Road, the site is experienced as a tract of open countryside between the existing Pinewood Studio developments to the north and residential development to the south. From the eastern edge of BPCP, there are long views out across fields within the site. These fields provide a coherent rural setting to the Park and bridleway WEX/21/1, and a buffer of open space between the Park and Pinewood Road.

1.14 The proposed development at Pinewood South would replace grassy fields within the site with a substantial development that would:

- Result in the loss of a considerable tract of open countryside between the existing Pinewood Studio developments to the north and development to the south.
- Result in the loss of long views out across fields within the site from bridleway WEX/21/1, and harm the rural setting to BPCP.
- Result in the loss of an open space buffer between BPCP and Pinewood Road.
- Result in the loss of attractive views from Pinewood Rd to woodland within BPCP.

1.15 The proposals would harm landscape and visual sensitivities within LCA 22.4, as described in the SBLCA, 2011, through:

- The loss of open, long views over fields.
- The loss of undeveloped spaces, in between highly developed areas.

1.16 The overall sensitivity of the local landscape to the changes proposed at Pinewood South is medium/high. With a medium/high magnitude of change the overall effect upon

the local landscape would be moderate/major adverse. This is considered to be broadly similar to the level of harm of the consented development.

#### Pinewood South (Visual Effects)

1.17 Visual receptors most affected by development at Pinewood South would be:

- People on Pinewood Rd. Moderate/major adverse initially, potentially reducing to moderate adverse after 15 years.
- People within BPCP on bridleway WEX/21/1 alongside the site. Major adverse initially, potentially reducing to moderate/major adverse after 15 years.
- Residents within Park Lodge & Royal Lodge. Major adverse initially, potentially reducing to moderate/major adverse after 15 years.

1.18 The level of harm to the visual amenity of people within BPCP and the residents in Park Lodge & Royal Lodge is similar to the level of harm of the consented development.

However, the current proposals would have a greater impact on people using Pinewood Rd.

#### Conclusion

1.19 Each of the developments at Alderbourne Farm and Pinewood South would result in adverse landscape and visual effects that are considered to be significant because they would:

- Harm landscape qualities identified in this review.
- Harm landscape and visual sensitivities identified within the SBLCA, 2011.
- Not achieve the Strategy / Vision for the respective landscape character areas, in which they are both located.
- Not achieve the purposes of the Colne Valley Regional Park, in which they are both located.

1.20 The proposed developments would result in adverse cumulative landscape and visual effects in combination with existing development at Pinewood Studios. These effects relate to the loss of a connection with the countryside along the western side of Pinewood Rd and the eastern side of bridleway WEX/21/1. Conclusion when comparing current proposals against existing consent

1.21 Compared with the consented development on Pinewood South, the proposed development would have a greater impact on the visual amenity of receptors in the local landscape, particularly people using Pinewood Rd. Notwithstanding this impact, the fundamental landscape harm, as it relates to Pinewood South, is broadly consistent with the consented development, and therefore this development on its own is likely to be considered to be acceptable.

1.22 The proposed development at Alderbourne Farm was not part of the previously consented development and is a new and separate development proposal which on its own would cause significant harm, primarily through its location north of Seven Hills Road within the Alder Bourne River Valley. It is recommended that the applicant considers exploring alternative options to accommodate the backlot provision proposed at Alderbourne Farm

elsewhere within the existing studio developments, within Pinewood South or its immediate context where it would relate better to the existing development.

1.23 If the Council is minded to approve the current proposals, information outlined in the conclusion of this report should be requested from the applicant to improve the certainty and/or quality of landscape outcomes.

### **Buckinghamshire Highways – 10<sup>th</sup> January 2023**

**Application Number:** PL/22/2657/FA

**Proposal:** A hybrid application to comprise: Part A - Full application for the change in use of 25.6 ha of land at Alderbourne Farm to form a nature reserve with footpaths, biodiversity enhancements, associated parking and infrastructure. Outline application with all matters reserved (except for principal points of access) for land at Alderbourne Farm for backlots and up to 35,000 sqft (3,252 sqm) of associated film production buildings (workshops) together with access roads and parking; Part B - Outline application for Pinewood South on 32.6 ha of land with all matters reserved (except for three principal points of access) for up to 1,365,000sqft (126,817sqm) of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure.

**Location:** Land South Of Pinewood Studios and Alderbourne Farm, Pinewood Road, Iver Heath, Buckinghamshire, SLO ONH

Thank you for your consultation letter with regard to the above planning application. The proposed scheme is an alternative to the Screen Hub UK (SHUK) scheme that was permitted by Buckinghamshire Council in April 2022. It is on the same footprint albeit covers a larger area than SHUK and includes Alderbourne farm. The application documents present this as an effective variation of the existing permission. It must however be stressed that this is a new application, and must be assessed and mitigated based on its own impacts and not on any previous permission that exists. The permitted SHUK scheme promoted a modest level of film production space, an education hub, business development space and a dominant feature of that application was a visitor attraction that was presented as being of national importance. The scheme before us is fundamentally different in nature being as it is nearly entirely film production with the business hub and education elements retained as minor elements within the application.

## Introduction and matters of principle

The TA sets out the requirements of the National Planning Policy Framework, in relation to determining applications in Highway Terms. Paragraph 110 and 111 of the National Planning Policy Framework sets out the following tests when considering the traffic impacts of a planning application;

Para 110. In assessing sites that may be allocated for development in plans or specific applications for development, it should be ensured that:

- a) Appropriate opportunities to promote sustainable transport modes 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.*
- c) The design of streets, parking areas, other transport elements and the content of associated design 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.*

Para 111. *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.*

The Highway Authority has tested this application against these criteria and come to its recommendation in the light of these tests.

The location of the development within Iver is remote from a significant centre of population and not easily accessible via public transport, with limited bus services in the vicinity and the rail/tube stations being beyond an acceptable walking distance. The development location therefore lends itself to the dominant mode of travel being the private car.

The TA sets out in section 1.2 the development background, this summarises the applications known as PSDF (13/00157/OUT) and SHUK (PL/20/3280/OA) and seeks to set out the highway works and s106 agreements within these two applications. It is notable that the PSDF application carried with it an obligation to deliver a traffic signals scheme at Five Points Roundabout (FPR) which has not yet been delivered. In 2019 an application for an alternative mitigation, Sevenhills Road (SHR) (PL/19/4430/FA) improvement was received and subsequently approved as a variation to the PSDF s106 agreement. On granting of permission Pinewood Studios served notice on the Council that they would implement the FPR scheme to fulfil the obligation of PSDF mitigation. There is currently a planning application with the council for this scheme (PL/21/4074/FA).

The SHR scheme was supported by a Transport Assessment carried out by iTransport, that sought to demonstrate that 30% of the traffic generated by Pinewood Studios was reaching the Strategic Road network at the M40 Junction 1, Denham interchange. It was found that

the scheme was an acceptable alternative to FPR to mitigate the impacts of PSDF by reducing the traffic pressure on FPR by the removal of that proportion of traffic and redirecting it away from Pinewood Studios via SHR and onward to the M40.

The SHUK application, (PL/20/3280/OA) used the same assessment criteria and network within its assessment. The visitor attraction would be accessed by persons from all over the country reaching the site from the Strategic Road Network, of which the closest location available is the M40 Junction 1. The nature of a visitor attraction promoted a significant proportion of visitors via coaches throughout the day which limited the impacts of peak hour traffic.

This application is fundamentally different from those previous applications and therefore it is necessary to assess it as such. This is a new application that seeks to develop large scale filming and production facility on the land, which will employ large numbers of people from surrounding residential areas, namely, Slough, Uxbridge and Hillingdon, Gerrards Cross, Beaconsfield and the surrounding small towns and villages within South Buckinghamshire and across London. This is a dispersed resident workforce that will approach the site from all directions. The number of employees at the site is also to be significantly different from that of the visitor attraction, and this will be borne out within the trip generation of the site, that will be significantly different in volumes and pattern from the previous application.

As a result, this application cannot be considered to be similar in transport terms to the SHUK application, rather if it has parallels with previous applications it can only be considered similar with the PSDF application and should be assessed in a similar manner to that application.

The applicant has carried out their transport assessment on a first principles approach over the assessed network and submitted the results of local junction modelling, which was the methodology used with the SHUK application. In review of this technical information the Highway Authority determined that the information provided allowed appropriate assessment of the network and a determination of the impacts.

To have confidence in the results of this methodology the Highway Authority has undertaken further review of additional evidence to determine the baseline traffic for the highway network. Future developments by this applicant should expect to use the Iver Strategic Model as the most comprehensive method of assessment, preventing the need for manual assessment of junctions outside the assessed area.

The application has used survey data from March 2022, which was of concern to the Highway Authority given the closeness to the ending of COVID-19 restrictions. In order to address the concerns further information and evidence was required to show that the data provided was representative of true highway conditions and supported across both the local and strategic networks. The Highway Authority has been able to corroborate this information with data gathered by the Council. Sensitivity testing has also been undertaken and supplied to the Highway Authority testing the network under conditions of higher demand and background traffic levels for greater certainty of the networks ability to accommodate the development traffic.

## Trip Rates

The trip rates supplied within this application are based on employee turnstile survey data from March 2022, the results of this survey show a significantly lower trip rate than that used and accepted within the SHUK application. These new trip rates are also lower than had been used within the PSDF application. These differences in the trip rates are explained by the development of PSDF which meant that a similar number of individuals would be working across the larger area leading to less overcrowding. The lower trip rates than SHUK have been evidenced as a result of proportions of the employee base now being able to work remotely for some of the week. And the provision of comparative rates to other film production sites show that these lower rates are not dissimilar to other sites. The new trip rates have been fully explained by the applicant and are considered appropriate to apply to the new development.

The accepted base trip rates (the assessment made prior to any sensitivity testing) are as follows;

**Table 10.11: Proposed Scheme Traffic Generation (AM Peaks)**

	AM Peak Hour 1 (0700 – 0800)			AM Peak Hour 2 (0715 – 0815)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	6	0	6	20	1	21
Business growth hub	13	2	15	26	2	28
Pinewood South Production Space	619	57	676	486	71	557
Alderbourne Farm Production Space	16	1	17	12	2	14
<b>Total</b>	<b>654</b>	<b>60</b>	<b>714</b>	<b>544</b>	<b>76</b>	<b>620</b>

Source: Tables 10.1, 10.3, 10.7 and 10.9.

**Table 10.12: Proposed Scheme Traffic Generation (PM Peaks)**

	PM Peak Hour 1 (1715 – 1815)			PM Peak Hour 2 (1730 – 1830)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Education hub	11	16	27	13	14	27
Business growth hub	4	55	59	3	43	46
Pinewood South Production Space	56	481	537	50	498	548
Alderbourne Farm Production Space	1	12	13	1	13	14
<b>Total</b>	<b>72</b>	<b>564</b>	<b>636</b>	<b>67</b>	<b>568</b>	<b>635</b>

Source: Tables 10.1, 10.3, 10.7 and 10.9.

Sensitivity testing has been carried out using these rates as a basis and then uplifting them to ensure that further assessment at a greater level of robustness has been considered.



## **The existing Sustainability of the site**

As previously mentioned the site is not easily accessible via sustainable modes, and has therefore secured travel planning measures in previous applications, including shuttle buses and requirements for cycleway infrastructure. The lack of sustainable travel options was also acknowledged within the Planning Inspectorates report and the Secretary of States findings regarding the 2013 application for the PSDF expansion.

The cycle and pedestrian options within Iver Parish are not complete and do not provide year-round or all weathers suitable provision for use as commuting routes. The current footway/cycleway on Pinewood Road is present but ceases at FPR, it has been the expectation to use developer funding to connect this with National Cycle Route (NCR) 61.

Delivery of pedestrian and cycle improvements are being actively pursued by the Transport Strategy team within the Council at the present time. NCR 61 runs east west through the parish of Iver, 1.6km south of the site and provides connectivity between Slough and Uxbridge. However current guidance states that cycling may provide a viable alternative for short journeys of up to 5km. This distance would reach the centre of Uxbridge or the northern edge of Slough, via the A4007 and the A412 respectively. The A412 Uxbridge Road is a high-speed dual carriageway, which is unsuitable for cycling. NCR61 would represent a significant southerly diversion from the centre of Uxbridge to reach the site and uses unlit routes including the bridge over the M25 at Palmers Moor Lane and Love Green Lane.

The A4007 Slough Road has no cycle provision on it and there is no current cycle provision to either Iver or Langley stations. Whilst there have been improvements to the provision in the area as a result of PSDF and other measures that were secured under SHUK, these do not yet represent a connected comprehensive network of sustainable travel options.

The Public Rights of Way (PROW) network in the Iver area provides connections between parts of the parish. However, these are principally recreational routes at the present time. The PROW network is important and should be improved and supported, though without significant improvements to make the surfaces suitable for all weather use by pedestrians and cyclists it does not constitute a network that should be considered part of the provision of the access the development.

Considering the Public Transport provision in the area, there is very limited access to the site by commercial bus route 3. The nearest stop is found east of FPR 500m from the closest corner of the site, well in excess of the current maximum recommended distance of 250m. The true distance to this stop is greater than this, as the development itself is 800m in length. The services do not provide a comprehensive timetable. To mitigate this previously Pinewood have provided private shuttle bus connections to local rail and underground stations. The shuttle bus service provides private connection to rail stations radially notably with the exception of Iver and Langley station.

## **Introduction to local highway network**

The local highway network is known to be significantly congested, with particular issues known to be present on the A412 Church Road, FPR and the junctions between Thornbridge

Road and Bangors Road North. There are also significant issues on the double mini roundabout at Bangors Road North/Bangors Road South/Slough Road. Sevenhills Road currently remains a link of poor quality with a section that is a single track road without passing places at its western end. FPR has also known to experience congestion issues hence the requirement for signalisation. The junction of SHR with the A412 Denham Road is known to perform poorly, with long delays to exit and turn right into Sevenhills Road representing a safety concern when these movements are performed during peak traffic conditions, and the SHR planning application demonstrated this.

The congestion and characteristics of the local highway network causes the local highway network to be a threatening and unwelcoming environment for walking and cycling, as identified within the Iver Neighbourhood Plan, which seeks to address this through ambitions to provide extensive improvements to the sustainable infrastructure.

It is therefore necessary that this application makes its own independent proposals for mitigation based on the trip generation and activity that this application will introduce. Further comments shall be made regarding this matter later in this response when considering the Travel Plan and the proposals presented, and appropriate obligations within the s106 table at the end of this response.

### **Road Safety Assessment**

The road safety analysis shows that the highway network does not have any pattern of collisions due to highway design. The applicants do acknowledge local concern at the junction of Black Park Road with the A412, and the way in which the Highway Authority has implemented a safety improvement addressing turning movements (removing right turns out of Black Park Road and modifying the ability to make U turns) at that junction in 2019. This reflects the improvement that has been seen within the recorded accident statistics. It is noted that the applicants propose a contribution of £25,000 towards safety improvements at this junction. This contribution is accepted as the development will see an increase in traffic in the area, and the presence of a new left in left out access point on the A412 close to this junction. The applicants haven't given a specific proposal that the Highway Authority would seek to progress at this time. Road Safety colleagues are supportive of the contribution, that should be secured for mitigation that can be implemented on the A412 in support of the existing safety scheme.

### **Local Highway Network Assessment**

As has been previously noted the highway network that has been assessed within this application is the same as that which has been used for the SHR and SHUK applications. It has been previously outlined within this response as to why those assessments have been accepted.

The network assessed has been identified using Automatic Number Plate Recognition (ANPR) survey data which identifies ~30% of Pinewoods existing traffic travels (tables 7.1 and 7.2 of the SHR application TA) to reach the M40 and onward to the M25 and wider network. With the introduction of the SHR scheme that traffic would be expected to reallocate away from the rest of the network.

The remaining traffic disperses over the network to the south and east of FPR and out of the Buckinghamshire network into the neighbouring areas. The Highway Authority initially had concerns with the cordon area used for the assessment and that it was not large enough. In response to this concern further work has been carried out to identify the potential volumes of traffic that could reach the wider network through the sensitivity testing, and the Highway Authority is content that the junctions beyond the assessed network would be impacted by low enough numbers of vehicles not to be a change in volumes that would require assessment or mitigation.

The peak hours used within the assessment are acceptable, and the premise of the overlapping assessment hours is continued from previous applications. This ensures that both the development peak hour traffic and the network peak hours are assessed fully.

#### **Operational Assessments of junctions.**

The baseline presented a less congested network than that presented for the SHUK application, with FPR, Pinewood Road/Pinewood Green and the SHR/A412 Denham Road junction now being presented as currently operating within theoretical capacity due to the use of a new set survey data. The Highway Authority was concerned by the degree to which the results differed from previous assessment and needed to be satisfied that the surveys gave a reliable representation of the network. To address these concerns two sets of sensitivity tests were carried out, and all other available local and national traffic data sets were scrutinised. The baseline models have been subject to robust assessment and the results of these describing the current performance of the network are now accepted by the Highway Authority.

A summary of the current junction performance is set out overleaf, as found in table 4.10 of the TA;

Junction	2022 Operation
Pinewood Road / Pinewood East Access	Below Operational Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity
Pinewood Road / Sevenhills Road	Below Operational Capacity
A412 Denham Road / Sevenhills Road	Below Maximum Capacity
Pinewood Road / Pinewood Green	Below Operational Capacity
Five Points Roundabout	Below Maximum Capacity
A412 Church Road / Thornbridge Road	<b>At Capacity</b>
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity
A412 Uxbridge Road / Black Park Road	Below Operational Capacity

The table uses Ratio of Flow to Capacity (RFC) values to determine the thresholds for the colour coding, below 0.85 for below operational capacity, between 0.85 and 1 for below maximum capacity and greater than or equal to 1 for at theoretical capacity.

### Proposed Scheme and access

The proposed scheme is for two key elements, the development of the land south of Pinewood Studios as production studios, education hub and a business growth hub (Centre Stage), and to the north of the existing studios: backlots; workshops; and a nature reserve at Alderbourne Farm. This proposal turns Pinewood studios into a campus of four sites, served by Pinewood Road and the western end of Sevenhills Road. It was a concern to the Highway Authority that this section of the public highway stands to become a defacto estate road serving internal movements between the different elements of the Pinewood estate. In order to demonstrate that the proposals will not prevent Pinewood Road remaining available for normal use by the traveling public, including residents on Pinewood Road and Pinewood Green an internal trips assessment has been supplied showing that the numbers of expected internal trips using Pinewood Road are not greater than 10 in any one peak hour and this is not a concern to the Highway Authority.

The Pinewood South element of the development is proposed to be accessed by two access points on Pinewood Road and one left in and left out access point on the A412 Uxbridge Road on the approach to Five Points Roundabout. These access points are as designed and approved by the previous permission for Screen Hub UK and are therefore established as being safe and suitable for accessing the site.

Mindful of the above comment the development proposals do not present any description of additional security gateway proposals, such as are found at Pinewood West, or Pinewood East. Rather the accesses are described as being as proposed for the SHUK application,

priority junctions as were proposed for public access car parks which would allow free dispersal within the car parks. The Highway Authority will therefore require by condition that details of security at the access points are addressed through reserved matters applications. It should be noted that it shall be a requirement of these applications to show how any security measures will be positioned in such a way as to ensure that there will be no standing traffic backing onto the public highway. This shall be by necessity a condition that must be satisfied prior to commencement of the site.

Access to Alderbourne Farm is proposed to be achieved through the creation of a new priority junction on Sevenhills Road, within the new section to be created as part of that scheme. The principal of this access is accepted, however it is noted as above that as a matter of reserved matters it will be required that details of the separation of the public access and the secure studio activities are to be managed and arranged.

It is proposed that layby parking will be maintained on the A412 Uxbridge Road through re-provision of parking spaces within other laybys. This is accepted and required by the Highway Authority to ensure that there is no loss in provision of these well used laybys and therefore no worsening of the highway safety with additional parking taking place on the dual carriageway.

Pedestrian and cycle access to the site is proposed to be provided to the studios space through the existing footway on Pinewood Road and the provision of footways into the site at the access locations.

Alderbourne Farm will have a pedestrian access along the existing farm access for the public access areas.

As all other matters are reserved other than access this is not an opportunity to comment on matters of the internal road layout or parking provision, however at the reserved matters stage it will be necessary for the applicants to supply a comprehensive parking accumulation exercise in order to demonstrate the parking provision is appropriate within the multi-story car parks.

### **Scheme impacts**

The Transport Assessment presented assessment of impacts in 2026 and 2036, as a year of opening and the end of the local plan period in line with normal practise. Comparative assessments have been carried out between a future year of no development on the site, the previously permitted Screen Hub UK proposals and the future year with this development. All future year assessments include both the Five Points Roundabout and Sevenhills Road schemes being implemented.

Since the submission of the Transport Assessment, to address the concerns of the Highway Authority additional capacity testing has been submitted in the form of technical notes. These notes are titled;

ITL17509-024A TN Sensitivity Test Scenario

ITL17509-025 TN Traffic Flow Diagrams and Comparison  
ITL17509-032TN ATC Analysis and Sensitivity Test 2 Parameters  
ITL17509-030A TN Sensitivity Test 1 [2<sup>nd</sup> issue]  
ITL17509-034 TN Sensitivity Test 2  
ITL17509-037A cumulative Impact Assessment  
ITL 17509-042 TN Potential Internal Trips

This response shall address the information contained within these notes following assessment of the information contained within the Transport Assessment, and explanation of the concerns that give rise to the additional information being provided.

It should be noted that the assessments of the highway impacts assume full development build out, and the full implementation of mitigation schemes at Five Points Roundabout and Sevenhills Road. The expectation of these schemes being implemented permits the applicants to reassign traffic over the network. The reassignment approach that has been used is the same as was submitted and accepted by the Highway Authority during the application for the Sevenhills Road scheme.

The Transport Assessment sets out that the overall trip generation of this proposal is less than that for the previously permitted Screen Hub UK application. It is accepted by the applicants that this proposal will result in greater numbers of peak hour trips, but less trips in the inter peak periods and at weekends, as would be expected due to the differences in the nature of the applications, and the absence of the visitor attraction element.

The modelling results supplied cover the following junctions:

- Pinewood Road /Pinewood East Access
- Pinewood Road/Pinewood West Access
- Pinewood Road/Sevenhills Road
- A412 Denham Road/Sevenhills Road
- Pinewood Road/Pinewood Green
- Five Points Roundabout
- A412 Church Road/Thornbridge Road(Mini Roundabout)
- A412 Church Road/Bangors Road North (Mini Roundabout)
- A412 / Black Park Road
- Pinewood Road site accesses
- A412 left in/left out access
- Alderbourne Farm site access

The above modelling uses the same models that were submitted for previous applications and therefore the geometry, calibration and fixed parameters within them has been checked and accepted by the Highway Authority.

A summary of the modelling impact assessment comparing the ‘without development’ against the ‘with development including mitigation’ is shown below (taken from table 13.23 of the Transport Assessment). This table includes the summary of the assessment of the SHUK to provide a comparison between the two schemes. It is helpful to understand this given that the Highway Authority has previously accepted that impact.

**Table 13.23: Summary of Traffic Impact Analysis**

Junction	Do Nothing	With SHUK	With Development
Pinewood Road / Pinewood East Access	Below Capacity	Below Capacity	Below Capacity
Pinewood Road / Pinewood West Access	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
Pinewood Road / Sevenhills Road	Below Capacity	Below Capacity ( <i>with new roundabout</i> )	Below Capacity ( <i>with new roundabout</i> )
A412 Denham Road / Sevenhills Road	Over Capacity	Below Capacity ( <i>with new signals</i> )	Below Capacity ( <i>with new signals</i> )
Pinewood Road / Pinewood Green	Below Capacity	Below Capacity	Below Capacity
Five Points Roundabout	Below Capacity ( <i>with new signals</i> )	Below Capacity ( <i>with new signals and SHR upgrade</i> )	Below Capacity ( <i>with new signals and SHR upgrade</i> )
A412 Church Road / Thornbridge Road	Over Capacity	Over Capacity, but with reduced queuing and delay compared with Do Nothing	Over Capacity, but with reduced queuing and delay compared with Do Nothing
A412 Church Road / Bangors Road North / A412 Denham Road	Below Maximum Capacity	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing	Below Maximum Capacity, with reduced queuing and delay compared with Do Nothing
A412 Uxbridge Road / Black Park Road	Below Capacity	Below Capacity	Below Capacity

The following assessment description focuses on the primary junctions impacted by development traffic which are: the A12 Denham Road/ Sevenhills Road; the two mini roundabouts on Church Road with Thornbridge Road; Bangors Road respectively and Five Points Roundabout. Points of access and junctions that are minimally affected have also been reviewed.

A412 Denham road/Sevenhills road

This junction is operating over capacity with long wait times on Sevenhills Road, this relates to the extremely dominant flow along the A412 at this location preventing the opportunity for vehicles to turn right into Sevenhills Road or to exit Sevenhills Road. The modelling results reflect this with movements at this junction being reported as having an RFC of greater than 1, and on Sevenhills Road in excess of 2. The generally agreed practical capacity of a junction is at an RFC of 0.85 or 85%. While junctions can still operate within theoretical capacity with an RFC value of up to 1 (100%), as theoretical capacity approaches 100%, delays will increase significantly. Without mitigation at this junction the results in the future year (2036) with development traffic, leads to an infinite result, indicating that the junction performance deteriorates to such an extreme that the model is no longer able to provide any functional estimation of the situation.

With the signals in place the results improve, providing control of the dominant flows, and enabling right hand turn manoeuvres to be undertaken in a safe manner with controlled turning movements, (it should be noted that traffic signals modelling results are reported in a different manner), and the Sevenhills road arm of the junction operates just within capacity. Queuing and delay are reduced on Sevenhills Road with the most noticeable improvements within the AM peak hours. With the provision of signals and the new development traffic the junction performance comes close to the theoretical capacity, and this is due to new turning volumes. A further sensitivity test has been undertaken to consider the impact of higher development flows at the junction. This is discussed further in the later sections of this response.

#### A412 Junctions with Thornbridge Road

The Thornbridge Road junction is shown to be operating close to its practical capacity at present and with particular issues occurring in the PM peaks on Thornbridge Road. In the future development year (2036) the situation on this arm improves relative to the situation that would occur due to background growth alone (no development or mitigation), due to reassignment of traffic onto Sevenhills Road. However, whether the development comes forward the A412 arms will remain at or over the maximum capacity.

#### Bangors Road North

The situation at Bangors Road North is similar, however the results are more favourable than those for Thornbridge Road with the junction performing within theoretical capacity in all scenarios.

#### Five Points Roundabout

The Five Points Roundabout junction has been modelled only as a signalised junction in the future years, this is due to the requirement incumbent on Pinewood Studios to deliver a scheme to introduce signals at this junction as part of the 2013 PSDF permission. The results



demonstrate that the junction will operate in the 2036 year within capacity, with the greatest demands being placed on the A412 Church Road, wood Lane and the A412 Uxbridge Road. Similarly, the Highway Authority recognises the sensitivity of this junction and the need to ensure that this assessment is robust. Therefore, the sensitivity testing that was required has looked at this junction again.

### Site Access Junctions

The site access junctions have been shown to have surplus capacity and therefore the Highway Authority does not have concerns regarding this, subject to the previously discussed requirements to ensure that the security measures that are presented within a reserved matters application to not cause the traffic using these junctions to queue back to the public highway and therefore negate these findings.

### Pinewood Green

The junction of Pinewood Green with Pinewood Road operates with surplus capacity due to the re-routing of traffic onto Sevenhills Road. It is expected that with the introduction of the Sevenhills Road scheme less traffic will use Pinewood Green to access the site.

### Fulmer

The Transport Assessment proceeds to make assessments of roads to the north and west of the site as well as Pinewood Green. With respect to the north and west (Fulmer parish) it is the Highway Authority's position that there is an impact on this area as a result of the development. This impact is small enough to not warrant junction assessments in this area, but significant enough that the proposed contribution to highway schemes within the parish should be secured to mitigate the impacts of additional through traffic and in recognition of the safety concerns within the parish, regarding speed and highway layout. A contribution is proposed in a similar way for schemes within Iver Parish, the Highway Authority is of the same view with respect to this as that for Fulmer.

### Sensitivity tests

To address the concerns of the Highway Authority regarding the lower trip rates used relative to previous applications and the differences in the base line survey data post COVID-19 a sensitivity test (test 1) has been undertaken using the 85<sup>th</sup> percentile trip rates from the March 2022 surveys. This test has demonstrated that when using this higher trip rate with the full mitigation package in place the network performance remains in a position of being within capacity or those areas that are over capacity are demonstrated to have an improved performance relative to the impacts of background growth without development and the associated mitigation package. The Highway Authority therefore has confidence that even

with an elevated trip rate there are no unacceptable impacts from the development under the parameters of this test.

The second sensitivity test has been carried out to address concerns regarding changes to the turning movements at key junctions and changes in the background traffic levels and growth seen between March and April 2022, noting current traffic volumes are lower than pre-COVID 19 traffic levels. To address these concerns this test uses the 85<sup>th</sup> percentile trip generation and uplifts the network flows by 4% in the AM peak and 10% in the PM peak. In this test the junctions considered are those on the A412 corridor, and the findings are that the junctions of the A412 Church Road with Thornbridge Road and Bangors Road North suffer a degraded performance, however this is not to the same extent as without development. Additionally, both Five Points Roundabout and the junction of Sevenhills Road with the A412 both remain within operational capacity.

On the basis of these sensitivity tests the Highway Authority is confident that it has a robust assessment of the Highway network that will be influenced by the development proposals and is in a position by which to come to a view regarding the acceptability of the application.

### **Proposed Highway Mitigation**

The proposal relies on two primary pieces of highways infrastructure to facilitate this development. The first of these is the introduction traffic signals at Five Points Roundabout, which as has been mentioned is the required mitigation for the 2013 PSDF scheme. The Council has been served notice that this is to be delivered and an application for this is currently with the Local Planning Authority. This scheme is not mitigation for this application, rather an obligation that is to be delivered for PSDF, that this scheme also depends on. This planning application brings forward improvements to Sevenhills Road as mitigation for the traffic impacts of the development. Details of the scheme are contained within drawings ITL15189-GA-014E to ITL15189-GA-018E. This scheme currently has planning permission which expires in 2024, however it has been assessed and full Highway Authority comments regarding the scheme and its details can be found under planning application number PL/19/4430/FA.

The current condition of Sevenhills road is entirely unsuitable for increases in traffic, the western section of the road is single track without passing places. The road is bounded by hedges and earth banks which limit forward visibility and the ability for opposing traffic to manoeuvre. The proposed scheme provides a full single carriageway road in this section that allows for two way traffic in a safe and suitable manner. The Highway Authority considers that the Sevenhills Road scheme is required to address both highway capacity issues and safe and suitable access to the studios by motor vehicles. The Highway Authority are concerned that even a minor intensification of this single carriageway section of road for accessing both the Alderbourne Farm or Pinewood South elements of the development gives rise to a detriment to highway safety as set out within paragraph 110 of the NPPF.

The Sevenhills Road mitigation also serves to provide a suitable alternative to the route through Pinewood Green which is not appropriate for development traffic being a residential area with a width restriction in its centre. At the junction of Thornbridge Road with the A412 there is an existing congestion issue, compounded by parking for the local shops and services. Development traffic being added to this junction gives rise to safety concerns due to the effective reduction in available carriageway and reduced opportunities for the passing of vehicles. Pedestrian safety is also a concern in an area that suffers from such congestion being present where there are parking manoeuvres taking place.

There is no information contained within the application documents as to how much of the development can be occupied before Sevenhills Road is delivered. The Highway Authority requested an assessment to identify a trigger point at which the mitigation would need to be delivered however the applicants have declined to provide this information. In the absence of a submission being present, in order to identify the trigger for the mitigation being necessary a further assessment shall be conditioned to be submitted prior to commencement and at the point of the first reserved matters application. The Highway Authority notes that the current permission for the Sevenhills Road Scheme (PL/19/4430/FA) requires that the scheme is completed and open within 18 months from commencement on site. This requirement is considered to be a requirement of any renewals of permission to ensure that the mitigation is complete and delivered in a timely way.

It is also proposed that a tarmac footway shall be provided along Pinewood Road to the north of Pinewood East roundabout. This provides pedestrian access to the Alderbourne Farm site for both the backlots and the public access nature reserve.

This development represents significant increases in traffic volumes during the peak hours, and lower impacts in the off peak periods. The SHR scheme provides opportunity to route some of the development traffic away from existing locations of congestion resulting in an impact that is less than severe.

### **Opportunities for Sustainable travel**

To address matters of sustainable transport a Framework Travel Plan (FTP) has been submitted as part of the planning application. The FTP sets out the current mode shares on the site, and the parameters against which targets for changes in mode share are to be set. It also sets out at a high level the measures by which the travel plans shall seek to achieve those targets. These are to be delivered in conjunction with the existing travel planning taking place on the site.

The Highway Authority accepts the Framework Travel Plan (issue 2 revision E) and shall condition this as the basis for detailed travel plans to be submitted as part of reserved matters applications. It is also proposed that the existing shuttle bus services provided by Pinewood to employees and users of the studios will be expanded to cover the new studios space. This is agreed by the Highway Authority as necessary in order to provide connectivity to other

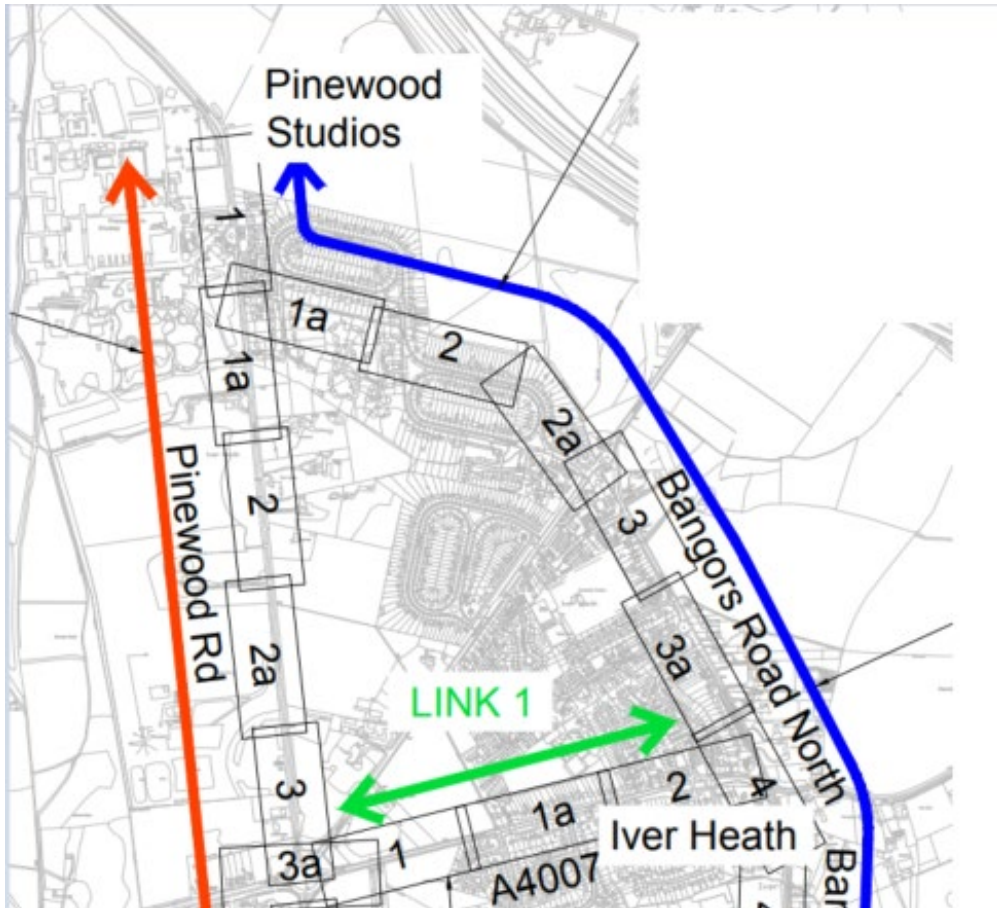
public transport hubs given the particularly low level of provision in the Ivers of commercial bus services.

The travel plan is supported by the provision of a signing strategy for all modes of transport that covers the whole of the Ivers Parish and extends to the M40 Junction 1 in the north. This shall be conditioned to be delivered in full prior to occupation of the site to ensure that staff and visitors have the best available information regarding routing for all modes of transport.

Pedestrian and cycling facilities will be present within the Five Points Roundabout scheme which shall improve access to the site over this junction that is currently a barrier to walking and cycling in the area.

The Highway Authority has considered the wider matters regarding the sustainability of the site and the ability of future people accessing the site, in addition to the findings of previous Planning Inspectors and the Secretary of State regarding the sustainability of the site. The development must meet the following requirements of the NPPF paragraph 110; *Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up given the type of development and its location.*

Both Langley and Iver rail stations are within cycling distance of the studios. The Ivers Cycle Strategy identifies cycle schemes which link Pinewood studios to these rail stations and the local area. The securing of a contribution (relative to the scale and kind of the development) to either a route to Iver or Langley station would enable the development to meet the above NPPF para 110. The Highway Authority proposes this application secures a contribution to enable the delivery of the northern section of the Pinewood - Iver station cycle route. The parts of the route to be secured are along the A4007 Slough Road and through Pinewood Green and Bangors Road north. The sections of routes a financial contribution is sought for enable their full delivery and are identified in the below diagram coloured in blue and green.



These routes complement the existing provision that has been made on Pinewood Road between Five Points Roundabout and the studios entrance. They will form options for those approaching from Iver village and station or the Uxbridge area to reach the different access points to the studios.

### Construction Traffic

The application does not address the construction traffic impacts within the documentation; however, these are temporary impacts on the highway network and so do not form part of the assessment of this application. The Highway Authority will be conditioning a full Construction Traffic Management Plan, as is standard practice with large sites. This shall be required to be submitted for approval prior to commencement.

### Conclusions

To conclude, the Highway Authority has determined that the assessment that has been undertaken, inclusive of the additional information and the conditions and obligations recommended demonstrates that the proposals:

- do not give rise to a severe impact on the highway network;

- safe and suitable travel can be achieved by all uses;
- opportunities to promote sustainable travel have been taken up given the type of development and location; and
- once the full mitigation package is delivered in its entirety the significant impacts of the development on the transport network in terms of capacity, congestion and highway safety will be effectively mitigated to an acceptable degree.

Mindful of the above the Highway Authority have no objections subject to the obligations and conditions set out below:

### **Buckinghamshire Local Enterprise Partnership- 30 January 2023**

In September 2020 Buckinghamshire LEP wrote in support of a planning application being made by Pinewood Studios for expansion. The growth project reflected the ambitions of both the Buckinghamshire Local Industrial Strategy and also the Economic Recovery Plan for Buckinghamshire.

The current application, with a dedicated focus on the development of new film production space, would result in Pinewood becoming the largest film studio in the world and would further support these ambitions and create greater employment and sectoral growth.

We understand that in part the revision is due to the accommodation of international demand that has already committed to the use of the new facilities. This will provide a significant boost to the wider local creative and film sector and to SMEs and independent businesses within the Buckinghamshire area over and above what may have been expected from the original proposal. We are particularly pleased to see a renewed commitment to the education and skills hub within the application, given the demand for talent within this sector. This facility will provide a magnet for world-class training and education for businesses and individuals working within this sector. It will help attract creative talents from across the world into Buckinghamshire as well as providing career pathways for many in the local community.

The Buckinghamshire Local Industrial Strategy identifies the creative and digital sector as a priority for investment and the “Centre Stage” Global Growth hub will clearly improve links between creative content providers and the wider business and specialist education networks both on and beyond the Pinewood lot.

These plans are entirely in line with the strategic objectives for the Creative Industry sector that have been set out by the LEP Board. Furthermore, the economic impact of these proposals is significant for both the national and the Buckinghamshire economy forecast to create over 8,000 full time jobs and increasing local productivity (GVA) by over £640m pa.

In offering their universal endorsement for these exciting proposals, the Board also wanted to highlight their desire to see innovative and integrated transport packages serve the new facilities and that the local business community will have the opportunity win contracts in

the development through the commissioning and running of the new facilities. We look forward to working with colleagues at Pinewood to help deliver these exciting proposals and bring significant investment into Buckinghamshire

## **Contributor Letters**

### **Objections:**

- Concerns about further development of green area/greenbelt.
- Concerns about increase in traffic and resultant pollution levels in the area.
- Concerns about increase traffic at the 5 Point roundabout – already busy due to HS2 works.
- Concerns that nature reserve will not provide sufficient habitat for local wildlife.
- Concern that local voice is not being included within decision making process
- Concerns that the existing infrastructure is already at capacity and unable to cope
- Concern that local interests are not being protected within decision making process
- Suggestion of using brownfield sites in Buckinghamshire to receive development instead
- Concerns about the legacy of the development of Pinewood Studios. Should filming industry change its needs, what future use will the site have? Concern that this could quickly become a future housing development.
- Concerns about potential increase in noise pollution generated by resultant traffic caused by facility.
- Development are not in keeping with the character of the area/Iver Heath (green countryside) and is becoming more urban.
- Concerns about the ability of roads surrounding Pinewood to support the extra traffic generated. Many roads are small, single track roads including Seven Hills, Alderbourne Road, Hawkswood Lane and Fulmer Lane (all which described as currently struggling with existing traffic levels).
- The blockages caused by roundabouts is redirecting vehicular traffic into single lane roads (Seven Hills Rd, Alderbourne Lane, Cherry Tree lane, Hawkswood Lane, and Fulmer lane), resulting in deterioration of road quality.
- Existing structures at Pinewood Studios are considered a visual eyesore that can be seen from long distance viewpoints.
- Feeling that the inclusion of ‘nature reserve’ on site is token and does not mitigate the changing character the development has on the area – described as industrial.
- Concerns about CIL payments taken by BC and desire to see where this money would go.
- Increase in light pollution caused by filming activity and constant security lighting on site.
- Local residents feel that the bund provision does not screen noise and light sufficiently (particular regards to upper 1<sup>st</sup> and 2<sup>nd</sup> storey levels).
- Impact upon personal health and well-being due to level of disruption caused by the current development. Concern that further development with exacerbate this.
- Concerns that Springfield Cottages are too close in proximity to studio backlots and filming activities.
- Concerns that proposed bunds facing Springfield Cottages will reduce sunlight into property but not shield impact of studios upon upper floors.
- Concerns that the previous mitigation measures proposed by prior Studio developments have not been fulfilled - Require Strict conditions to ensure they are included in any potential future development.



- Concern about suitability of nature reserve location – bound by motorway on two sides (will be impacted by noise and pollution).
- Concern about lack of pedestrian access to nature reserve in the scheme.
- Heavy lorries servicing studios are damaging properties on heavily trafficked roads.
- Concerns over loss of mature trees. Replacement planting provision feels small or inadequate to mature species lost.
- Concerns that waterways/streams have become polluted due to leaks caused by studio activities.
- Concerns about lack of main drainage on site.
- Iver Heath Residents Association – view that two applications should have been sought by BC - would help enable stakeholders to assess merits/impact of development rather than hybrid application. (They point out that the application relates to two separate/unrelated locations).
- Concerns about other urban developments in Iver Heath area – Data centres / Motorway services.
- Pedestrians feel unsafe due to increase traffic on many ‘cut through roads’ that lack pedestrian pavements.
- Concern about security of local nature reserve. Fear location will be used for anti-social behaviour (similar to crime in Black Park).
- Concern about wider environmental impact/footprint of studio – does studio have plan to contribute towards CO2 reduction?
- Concerns about the flow of large volumes of non-residents in the area who work on the site.
- Development will destroy characteristics of heritage village.
- Concern that proposal submitted by Pinewood are not sustainable and do not align with UK promise to the Paris Climate Agreement and UN Sustainable Development Goals.
- Questions over the economic benefit for the residents of Fulmer.
- Concerns about loss of hedgerows.
- Increase in anti-social behaviour in the area (Litter).
- Concern about how consultation meeting are conducted – often mid-week in the morning with little notice. Prevent individuals from participating.
- Lack of engagement with the community/local residents.
- Concerns about Air Quality Action Plan for Iver Heath (BC have extended timeline – but impact of Pinewood to be in direct conflict).
- Local residents feel studios offer no benefit to community.
- Concerns about the lack of existing street pavements and street lighting on Fulmer Common Road.

**Neutral:**

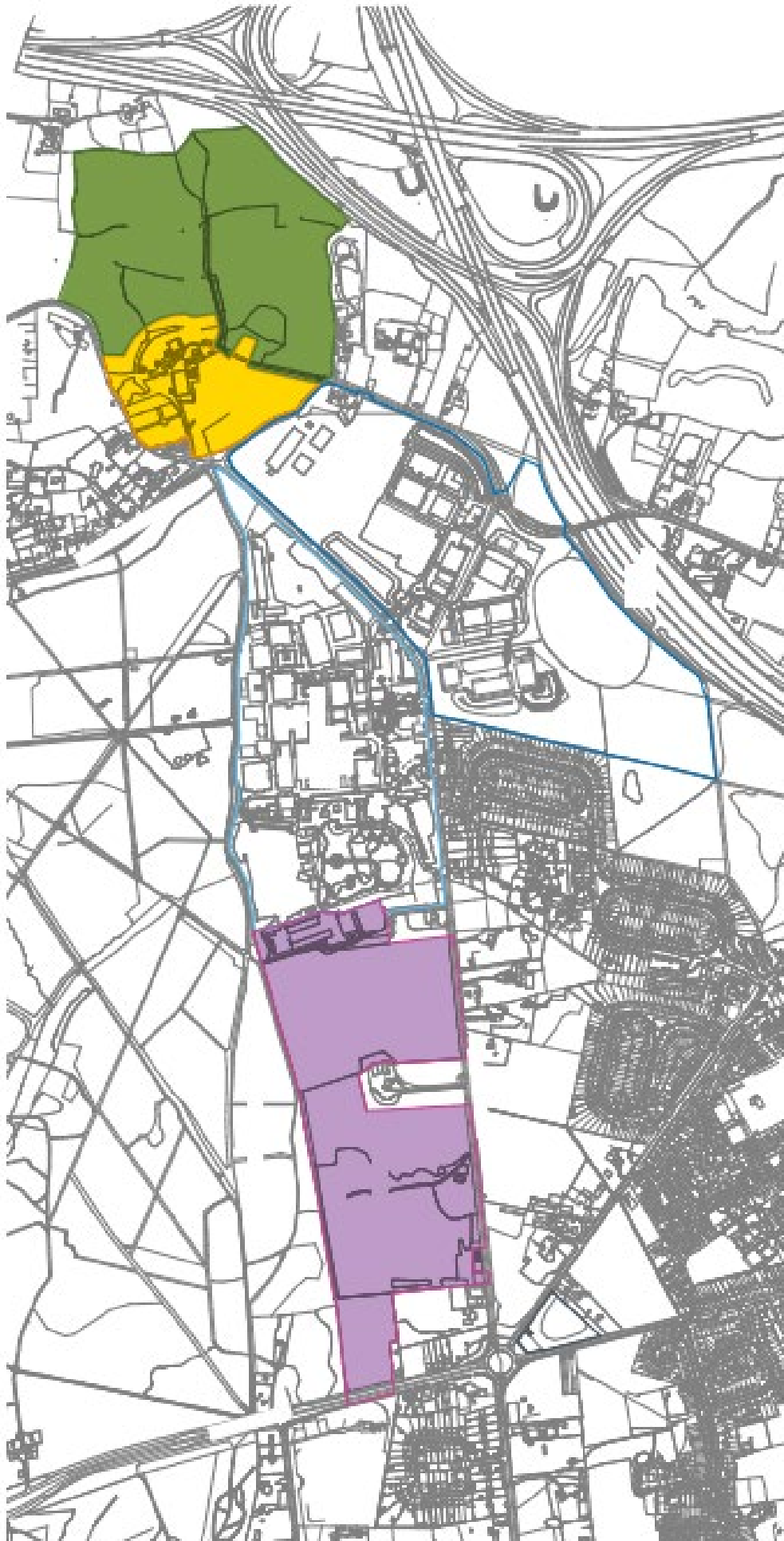
- Concerns about adequate protection from Studio for immediate neighbours.
- Suitable long term governance and funding for Fulmer Nature Reserve.
- Additional traffic calming measure over and above the existing ScreenHub S106 agreement

**Support:**

- Production companies (Lucasfilm Ltd. And Disney) have successful working relationships with Pinewood Studios producing features for film and television.

- Large scale productions require access to a variety of facilities including stages/soundstages, production spaces, backlots and other associated facilities.
- Co-locating these facilities on a single site is highly beneficial for production companies, reducing production cost and facilitating greater collaboration.
- Pinewood Studio is one of a few locations in the UK that provides the high quality filming facilities in a single location.
- There is a current shortage of high quality studio spaces/stages in the UK due a lack of capacity in existing facilities, even after recent expansion works.
- Suggestion that The *Centre Stage* education and development hub in the proposed expansion will help create new skilled professionals to support the growing film industry in the UK.
- The lack of capacity at Pinewood Studios and other facilities in the UK has resulted in a loss of multiple large scale productions worth multi-million dollars to other international competitors.
- The partnership between Pinewood Studios National Film and Television School (NFTS) will allow NFTS to provide world class opportunities to for education in the filming and television industry at the *Centre Stage* Education and Skills Hub.
- There is a current skill-gap/shortage of skilled professionals in the UK in key areas such as carpentry, lighting and costume which could be addressed by the proposed education hub.
- Pinewood is an established brand and leading iconic studio space in the UK.
- The UK production industry is a grow sector with production spends totalling £5.64 billion in 2021, an increase of 63% (£2.19) from 2017. (Of this figure £4.7 Billion can be attributed to the Pinewood Studio and Shepperton Studio facilities).
- Support shown for the creation of Fulmer nature reserve. The change of use from private farm land to open green space local residents can use is welcomed.
- New walking routes provide opportunities for outdoor recreation/walking.
- Support for new scheme with understanding that it will reduce traffic flow and help accelerate the delivery of much-needed improvements on Seven Hills Road.
- Support for general economic and environmental benefits of the proposed scheme.
- Support for the retention of Black Park Peace Path.

**Appendix B - Site Location Plan**



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- Part A
- Part B
- Part C

**CLIENT**

Pinewood Group Ltd.

**PROJECT**

Screen Hub UK

**DRAWING**

Site areas plan

<b>PROJECT NO.</b>	<b>STATUS</b>
PINS3006	Final

<b>DRAWING NO.</b>	<b>SCALE</b>
18_	10,000 @ A3

<b>REVISION</b>	<b>CHECKED BY</b>
00	SD

<b>DATE</b>
Feb 2023



## Appendix C- Parameter Plans

### Pinewood South

- 3939-FBA-01-00-DR-A-01\_001\_P01 - PP1 Site Context (current levels)
- 3939-FBA-01-00-DR-A-01\_002\_P01 - PP2 Site Context (proposed levels)
- 3939-FBA-02-00-DR-A-01\_003\_P01 - PP3 Development Zones
- 3939-FBA-01-00-DR-A-01\_004\_P01 - PP4 Land Use
- 3939-FBA-01-00-DR-A-01\_005\_P01 - PP5 Green Infrastructure
- 3939-FBA-01-00-DR-A-01\_006\_P01 - PP6 Access and Movement
- 3939-FBA-01-00-DR-A-01\_007\_P01 - PP7 Building Heights

### Alderbourne Farm

- 3939-FBA-01-00-DR-A-01\_001\_P01 - PP1 Site Context (current levels)
- 3939-FBA-01-00-DR-A-01\_002\_P01 - PP2 Site Context (proposed levels)
- 3939-FBA-01-00-DR-A-01\_003\_P01 - PP3 Development Zones
- 3939-FBA-01-00-DR-A-01\_004\_P01 - PP4 Land Use
- 3939-FBA-01-00-DR-A-01\_005\_P01 - PP5 Green Infrastructure
- 3939-FBA-01-00-DR-A-01\_006\_P01 - PP6 Access and Movement
- 3939-FBA-01-00-DR-A-01\_007\_P01 - PP7 Building Heights
- 3939-FBA-01-XX-SC-A-01\_008\_P01 – PP9 Proposed Demolitions

## Pinewood South Parameter Plans





Notes:

DIAGRAM KEY:

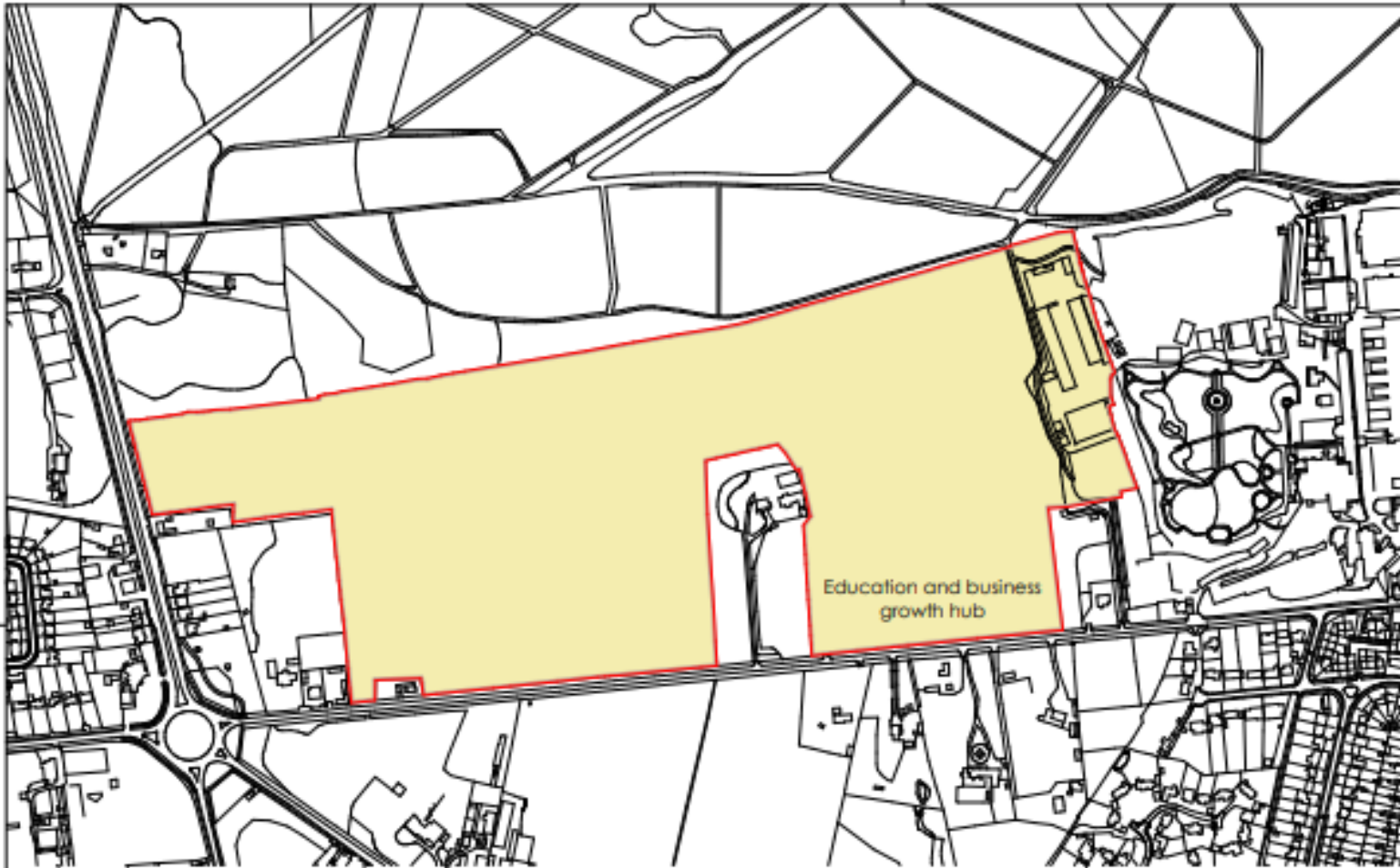
- APPLICATION BOUNDARY
- EXISTING TREES
- $\nabla$  PROPOSED LEVELS
- $\nabla$  EXISTING LEVELS FROM TOPOGRAPHIC SURVEY

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Do not scale this drawing  
Do not derive dimensions from digital media

Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status:	Subsidiary:	Drawing No:	Rev:		
P01	27.04.22	ISSUED FOR PLANNING	JH	CE	<b>PLANNING</b>	<b>S2</b>	<b>3939-FBA-01-00-DR-A-01_002</b>	<b>P01</b>		
					Job Title:		© Drawing & Design Copyright Ltd			
					<b>PINEWOOD SOUTH</b>		<b>3939</b>			
					Drawing Title:					
					<b>PP2 SITE CONTEXT (PROPOSED LEVELS)</b>					
					Date:	Scale:	Drawn By:	Checked By:		
					JUN '22	1 : 5000	JH	BS	Faulkner Browns LLP Colson House Newburnhill Way Edinburgh Midlothian EH20 9JH T+44(0)131 268 8007 F+44(0)131 2476132	





**Notes:**

Production studio development zone - a film and media production hub including sound stages, workshops, offices, a backlot and ancillary uses of similar form to the facilities on the adjacent Pinewood studios estate.

The site also makes provision for:

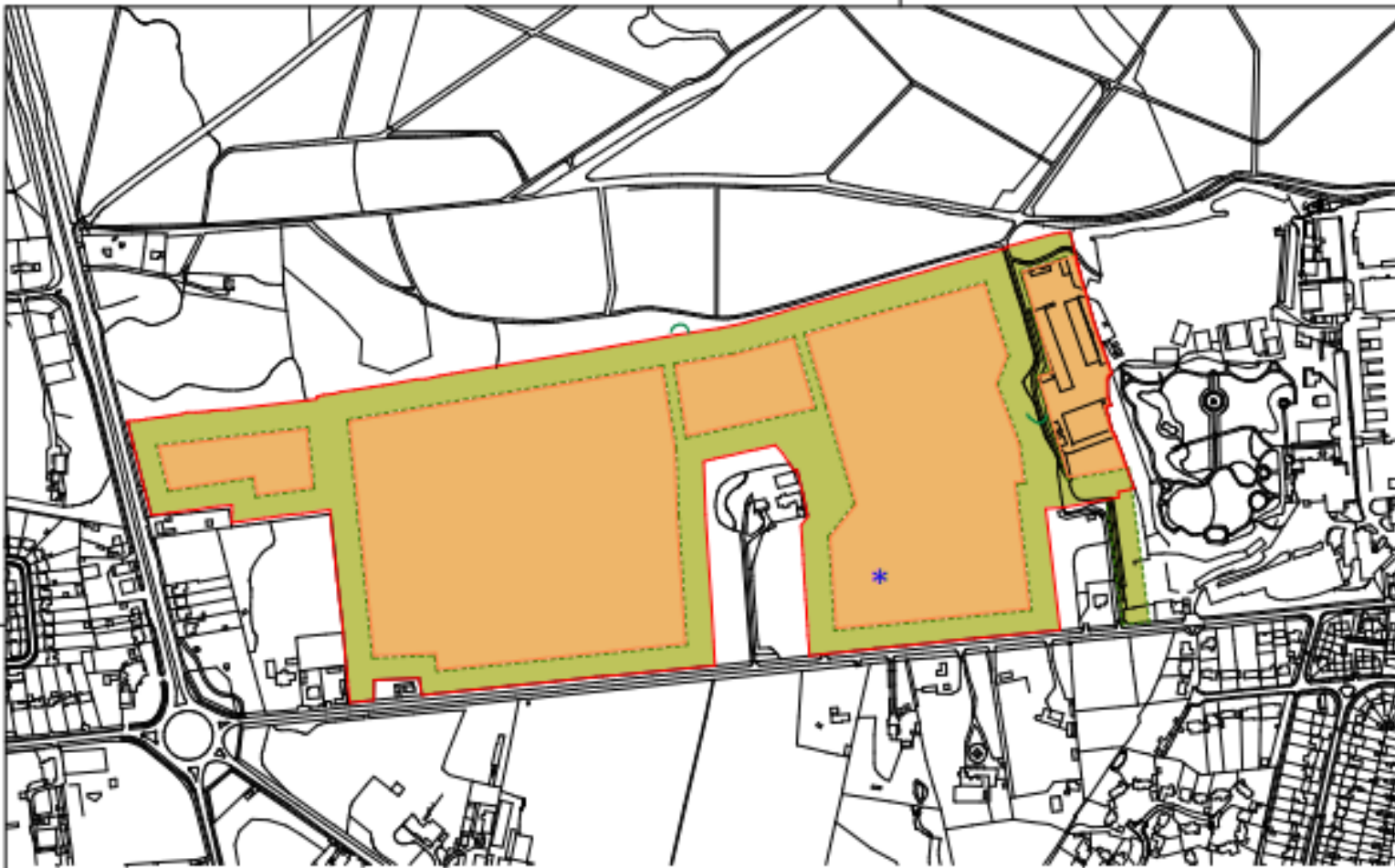
- a) Education hub - building(s) in which film and media related education support and outreach is provided
- b) Business growth hub - building(s) in which screen and media related start-up, incubator and commercial floorspace is provided together with wider business support facilities



Do not scale this drawing  
Do not derive dimensions from digital media



Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Building	Drawing No	Rev
P01	27.06.22	ISSUED FOR PLANNING	JH	CE	<b>PLANNING</b>	<b>S2</b>	<b>3939-FBA-01-00-DR-A-01_003</b>	<b>P01</b>
					Job Title	Job No	© Drawing & Design Copyright Ltd	
					<b>PINEWOOD SOUTH</b>	<b>3939</b>	<b>FAULKNERBROWNS ARCHITECTS</b>	
					Drawing Title			
					<b>PP3 DEVELOPMENT ZONES</b>			
					Date	Scale	Drawn By	Checked By
					<b>JUN '22</b>	<b>1 : 5000</b>	<b>JH</b>	<b>BS</b>
								Faulkner Browns LLP Oakden House New Woodlands Way Epsom Surrey Newcombe upon Tyne NE22 6JH T+44(0)191 268 8000 F+44(0)191 2478102



**Notes:**

The land use parameters comprise built form (including access, parking and servicing) and green infrastructure.

The production studio will be a series of buildings of different forms as required by the needs of film production.

The Education and Business Growth Hubs will be one or more individual or interconnected buildings sited within the area adjacent to Pinewood Road.

A backlot of up to 4 acres is intended as an option within the development area.

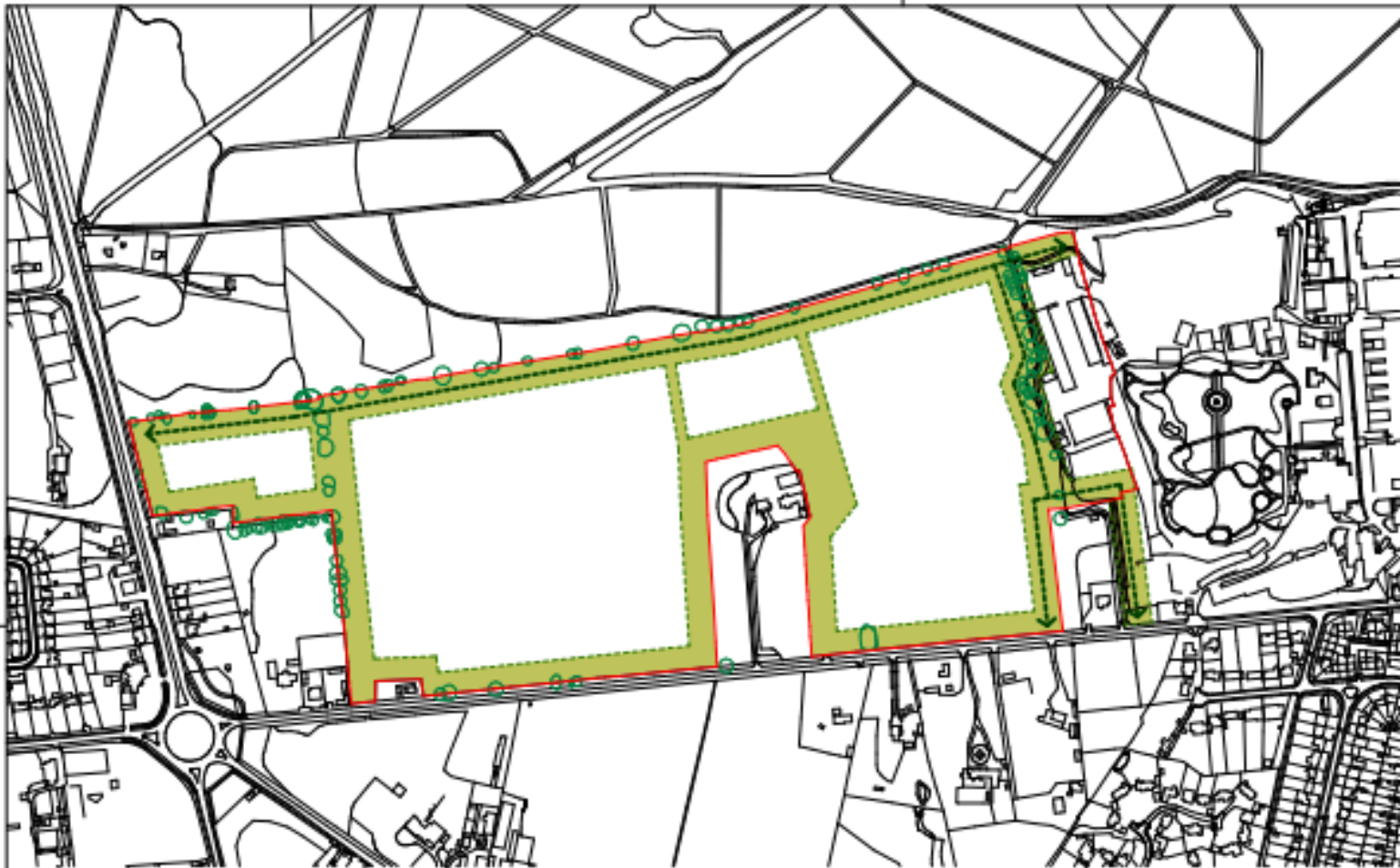
**DIAGRAM KEY:**

- APPLICATION BOUNDARY
- GREEN INFRASTRUCTURE
- BUILT FORM (BUILDINGS, PARKING AND ASSOCIATED INFRASTRUCTURE, INCLUDING OPTIONAL BACKLOT WITHIN DEVELOPMENT ZONE)
- \* EDUCATION AND BUSINESS GROWTH HUBS



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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev
P01	27.06.22	ISSUED FOR PLANNING	JH	CE	PLANNING	S2	3939-FBA-01-00-DR-A-01_004	P01
					Job Title	Job No.	© Drawing & Design Copyright Ltd	
					PINWOOD SOUTH	3939	<b>FAULKNERBROWNS ARCHITECTS</b> 	
					Drawing Title	Faulkner Browns LLP Deodar House Northampton Way Kingtonville Birmingham B37 7YU UK T +44 (0)191 268 8007 F +44 (0)191 2476132		
					Date	Scale	Drawn By	Checked By
					JUN '22	1 : 5000	JH	BS



**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 off; 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 up 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.

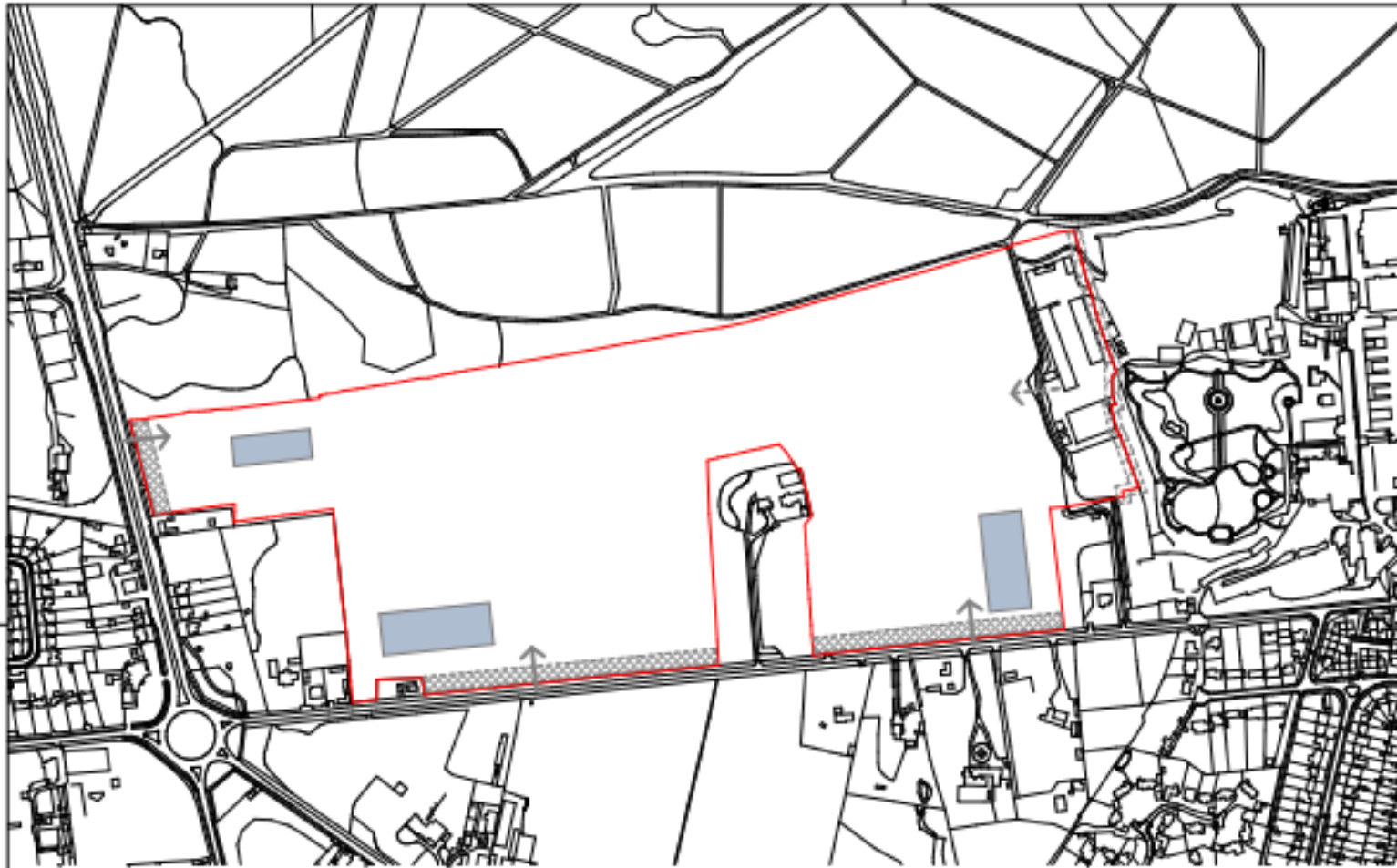
Provision will be made for bat mitigation to recognise the presence of a batsite Bat colony within Black Park. This will be set out in a specific bat mitigation strategy and will include low light zone areas along the edge of Black Park and along the route of the Peace Path and reinforced planting (to support existing transect routes).



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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev
P01	27.06.22	ISSUED FOR PLANNING	JH	CE	<b>PLANNING</b>	<b>S2</b>	<b>3939-FBA-01-00-DR-A-01_005</b>	<b>P01</b>
					Job Title	Job No.	© Drawing & Design Copyright ©	
					<b>PINEWOOD SOUTH</b>	<b>3939</b>	<b>FAULKNERBROWNS ARCHITECTS</b>	
					Drawing Title			
					<b>PPS GREEN INFRASTRUCTURE</b>			
					Date	Scale	Drawn By	Checked By
					<b>JUN '22</b>	<b>1 : 5000</b>	<b>JH</b>	<b>BS</b>
								Faulkner Browns LLP Deodar House Northampton Way Kingtonville Newark/Leamington NN12 6DQ T: +44(0)193 268307 F: +44(0)193 247810





**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.

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.

The principal visitor/user parking will be to a series of MSCPs as noted. Surface parking will take place over the site for operational use in association with the buildings.

**DIAGRAM KEY:**

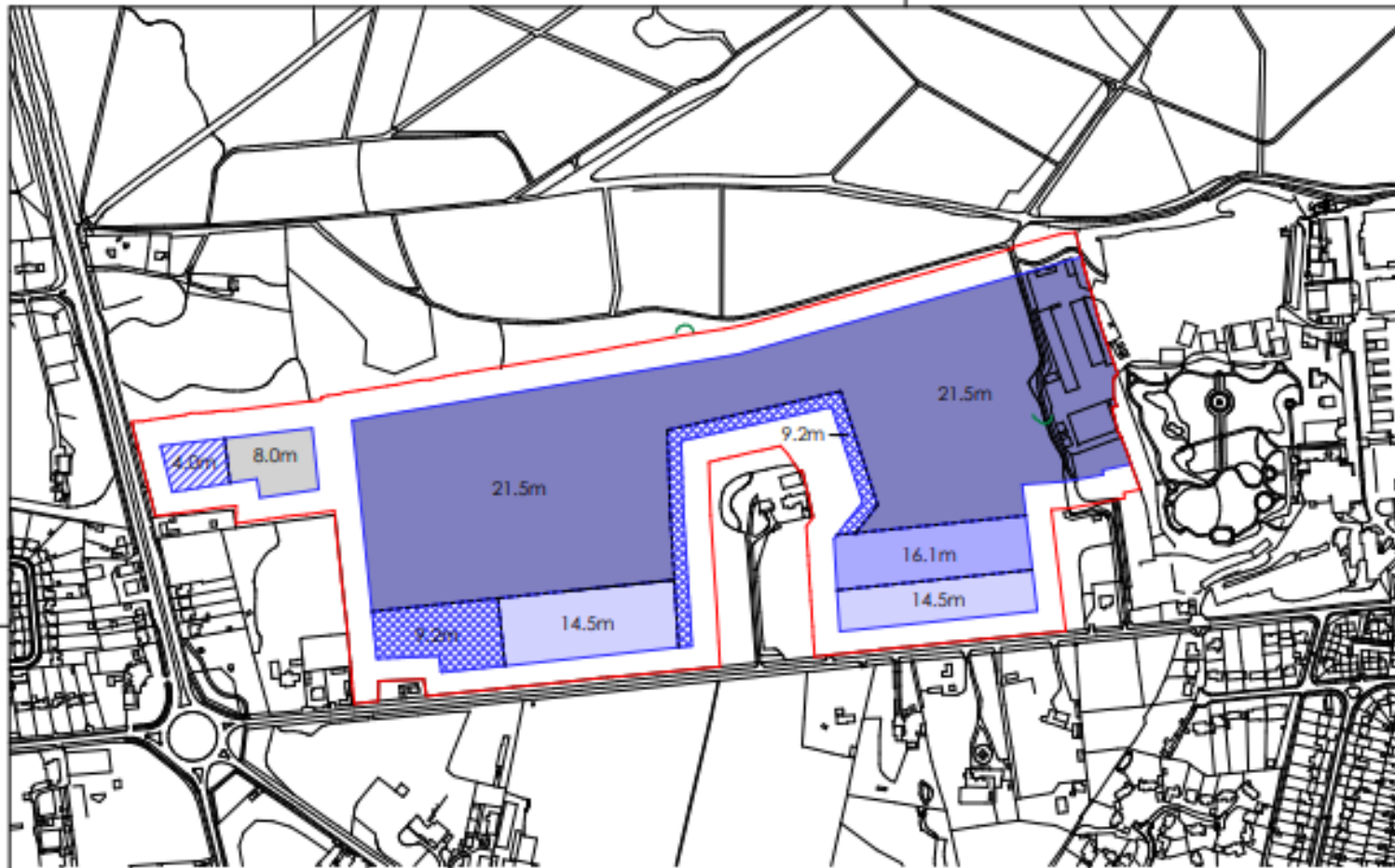
- APPLICATION BOUNDARY
- LIMITED AND CONTROLLED ACCESS FROM EXISTING STUDIOS IN DAYLIGHT ONLY
- MULTI STOREY CAR PARK (BROAD LOCATION)
- PRINCIPAL ACCESS
- ACCESS ZONE FROM EXISTING STUDIO
- ACCESS ZONE



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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev.
P01	27.06.22	ISSUED FOR PLANNING	JH	CE	<b>PLANNING</b>	<b>S2</b>	<b>3939-FBA-01-00-DR-A-01_006</b>	<b>P01</b>
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					PINEWOOD SOUTH		3939	
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					PP6 ACCESS AND MOVEMENT			
Date		Scale		Drawn By		Checked By		
JUN '22		1 : 5000		JH		BS		
					<b>FAULKNERBROWNS ARCHITECTS</b> 			Faulkner Browns LLP Deodar House New Bourton on the Hill Kidlington New College Lane Oxford OX5 1JY T+44(0)1852 268800 F+44(0)1852 476132



**Notes:**

The maximum height of any building within the build area 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).

There may also be additional rooftop infrastructure (such as PV cells and plants). These are generally excluded on the height parameters as they will be minor in terms of appearance.

**DIAGRAM KEY:**

APPLICATION BOUNDARY	+14.5M HEIGHT ZONE	+4.0M HEIGHT ZONE
+21.5M HEIGHT ZONE	+9.2M HEIGHT ZONE	
+16.1M HEIGHT ZONE	+8.0M HEIGHT ZONE	



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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev.
P01	27.06.22	ISSUED FOR PLANNING	JH	CE	PLANNING	S2	3939-FBA-01-00-DR-A-01_007	P01
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					PINWOOD SOUTH	3939	FAULKNERBROWNS ARCHITECTS	
					Drawing Title	FAULKNERBROWNS LLP Dobson House New Portland Way E3 6JG London Surrey/Chorley Type M12 6JH		
					Date	Scale	Drawn By	Checked By
					JUN '22	1 : 5000	JH	BS
					T+44(0)181 2681807 F+44(0)181 2476152			

## Alderbourne Farm Parameter Plans

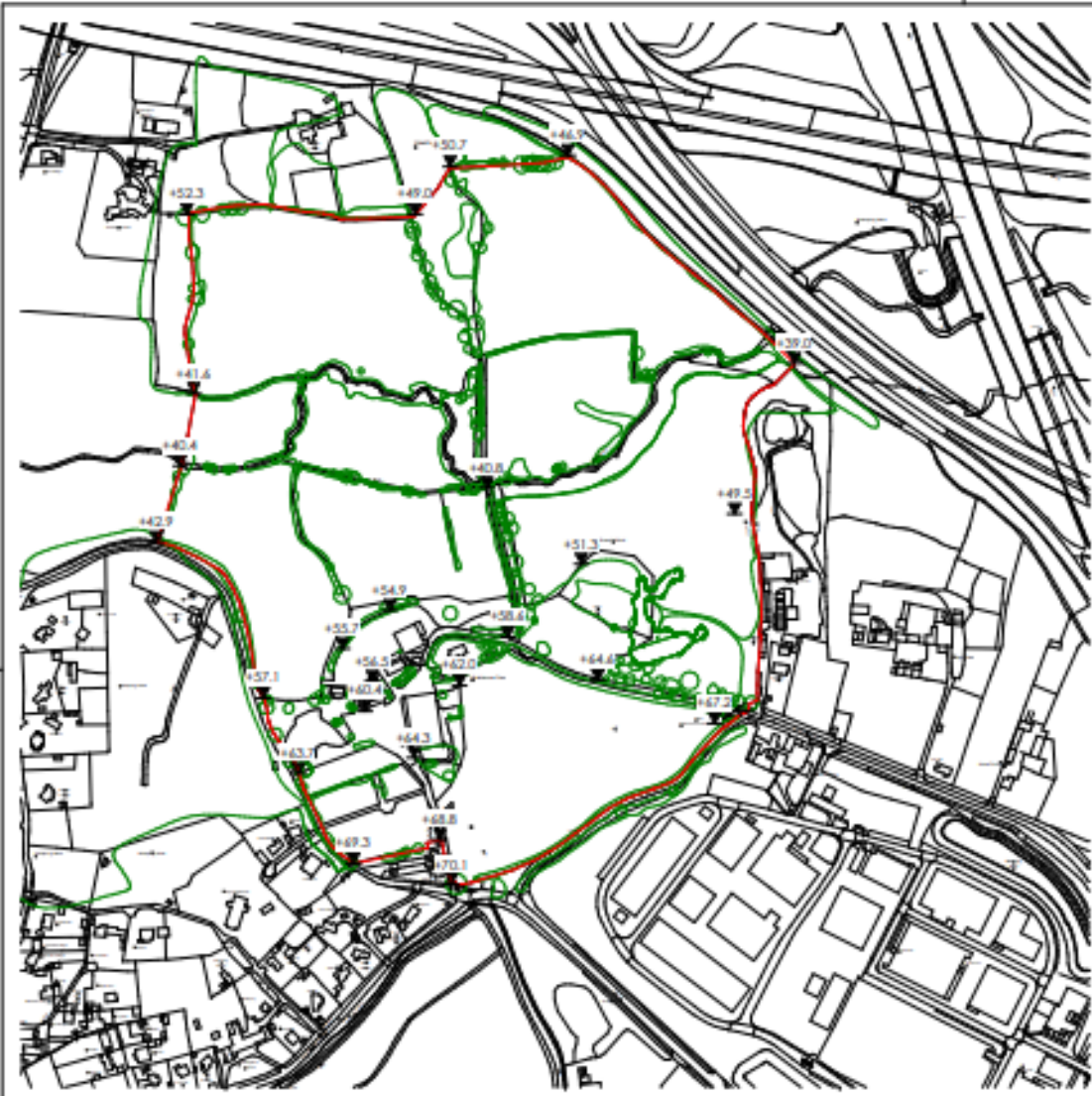


DIAGRAM KEY:

- APPLICATION BOUNDARY
- ⊙ EXISTING TREES
- EXISTING VEHICULAR ACCESS
- EXISTING SPOT LEVELS

Notes:  
Source – topographic survey

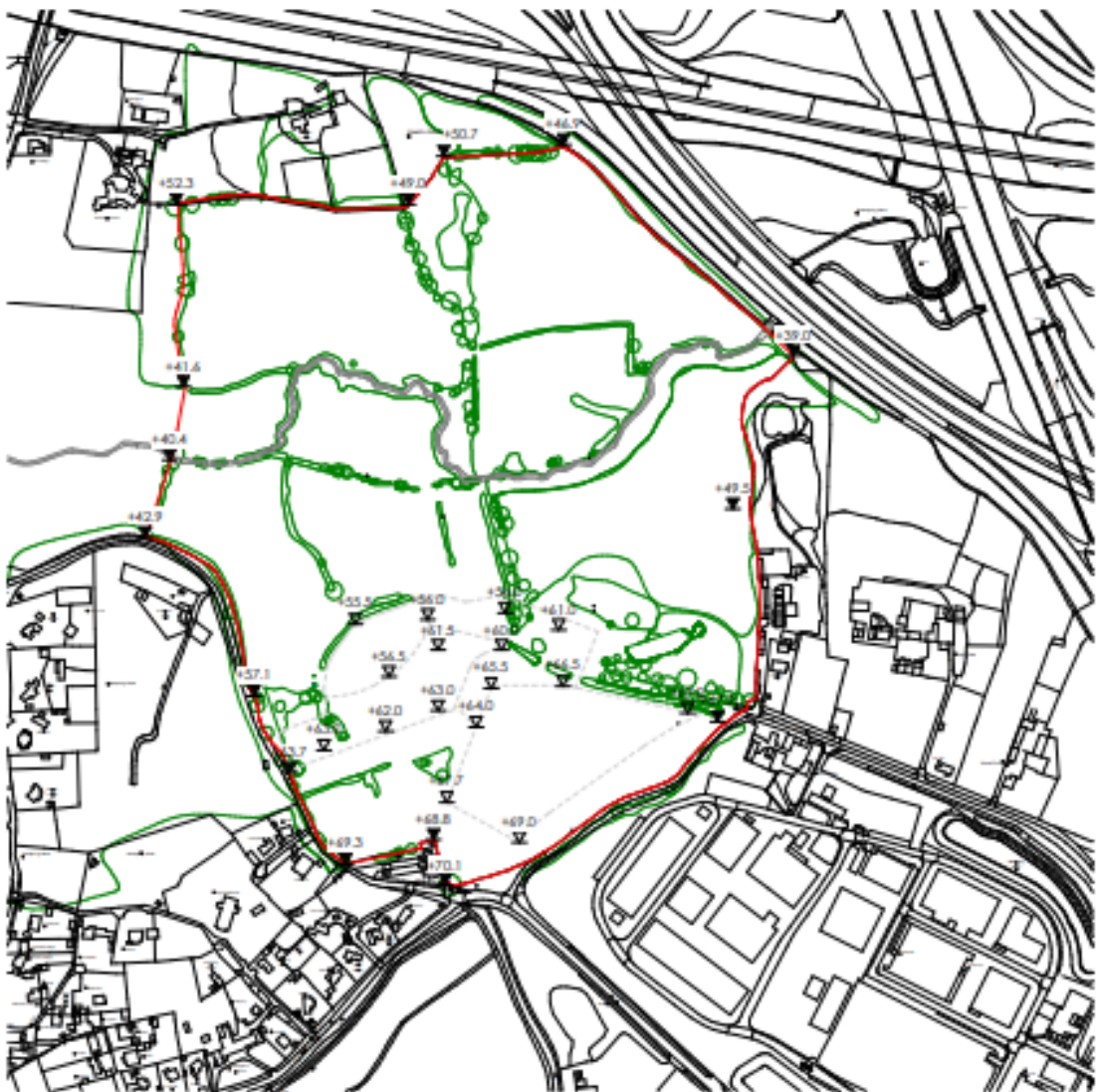


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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev
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					Job Title	Job No.	© Drawing & Design Copyrights Ltd	
					ALDERBOURNE FARM	3939	FAULKNERBROWNS ARCHITECTS	
					Drawing Title	PP1 SITE CONTEXT (CURRENT LEVELS)		
Date	Scale	Drawn By	Checked By					
JUN '22	1 : 5000	JH	BS	Faulkner Browns LLP Dobson House New Bunsford Way Gillingham Kent ME12 6JH T+44(0)1622 268800 F+44(0)1622 249610				





**DIAGRAM KEY:**

- APPLICATION BOUNDARY
- EXISTING TREES RETAINED
- M PROPOSED LEVELS
- M EXISTING LEVELS FROM TOPOGRAPHIC SURVEY

Notes



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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev
P01	29.06.22	ISSUED FOR PLANNING	LW	JH	PLANNING	S2	3939-FBA-02-00-DR-A-01_002	P01
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					ALDERBOURNE FARM	3939	FAULKNERBROWNS ARCHITECTS	
					Drawing Title			
					PP2 SITE CONTEXT (PROPOSED LEVELS)		Faulkner Browns LLP Oakwood House Newmarket Road Bishops Cleeve Newmarket upon Tyne NE12 8DW T+44(0)1632 268807 F+44(0)1632 478132	
Date		Scale	Drawn By	Checked By				
JUN '22		1 : 5000	JH	BS				



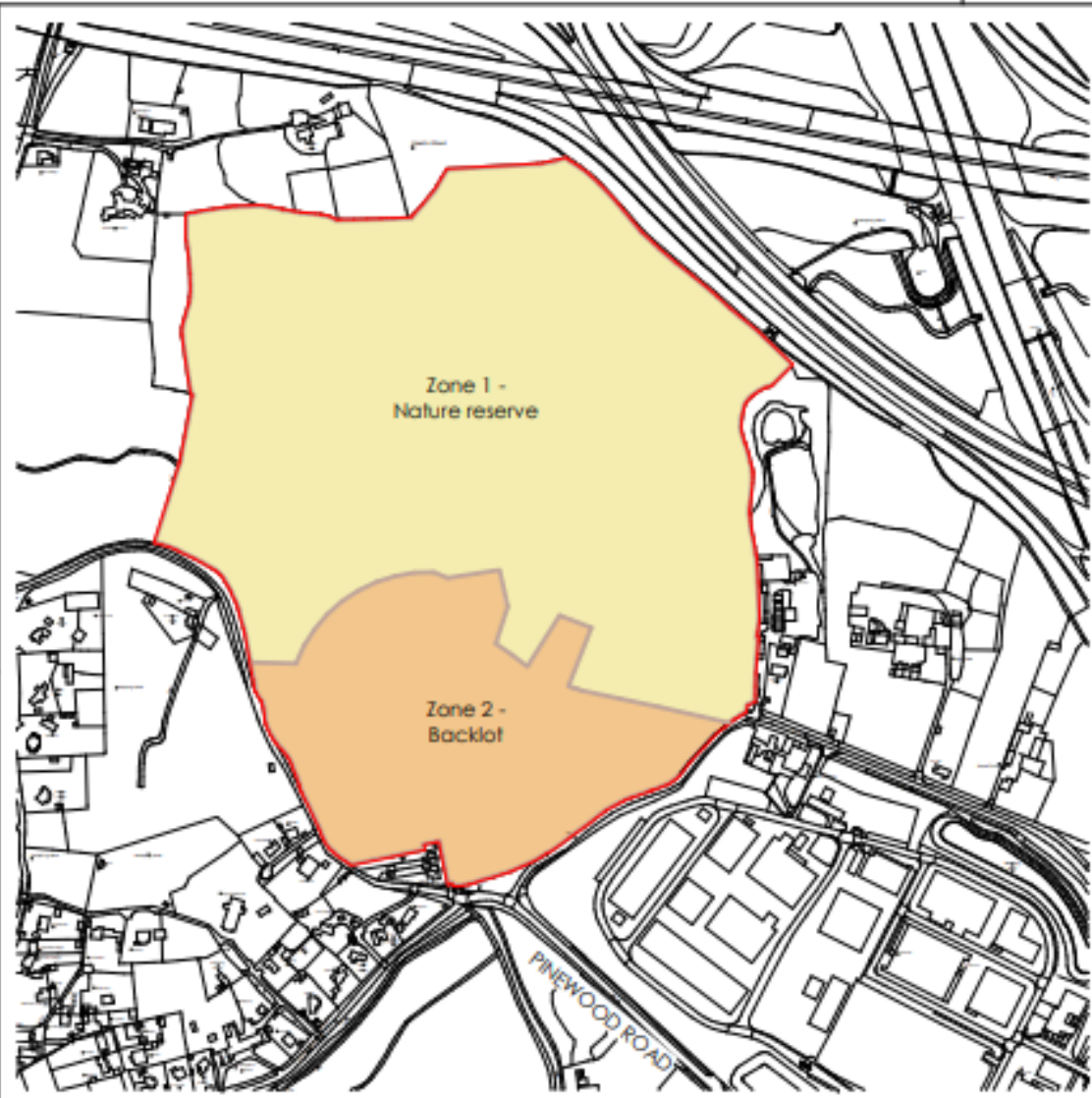


DIAGRAM KEY:

- APPLICATION BOUNDARY
- EXTENT OF DEVELOPMENT ZONE 1
- EXTENT OF DEVELOPMENT ZONE 2

**Notes:**

Backlot development zone, including external firing areas and production workshops - 9.8 Ha

Nature reserve zone - 25.6 Ha



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Rev	Date	Revision Notes	Drawn By	Checked By
P01	27.06.22	ISSUED FOR PLANNING	LW	JH

Drawing Status:	<b>PLANNING</b>	Subsidiary:	<b>S2</b>
Job Title:	ALDERBOURNE FARM	Job No:	3939

Drawing No:	<b>3939-FBA-02-00-DR-A-01_003</b>	Rev:	<b>P01</b>
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Drawing Title:			
<b>PP3 DEVELOPMENT ZONES</b>			
Date:	Scale:	Drawn By:	Checked By:
JUN '22	1 : 5000	JH	BS

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Faulkner Browns LLP Dalton House Newburn Road Kilmarnock Newcastle upon Tyne NE22 6JH T+44(0)191 268 8007 F+44(0)191 2478132	

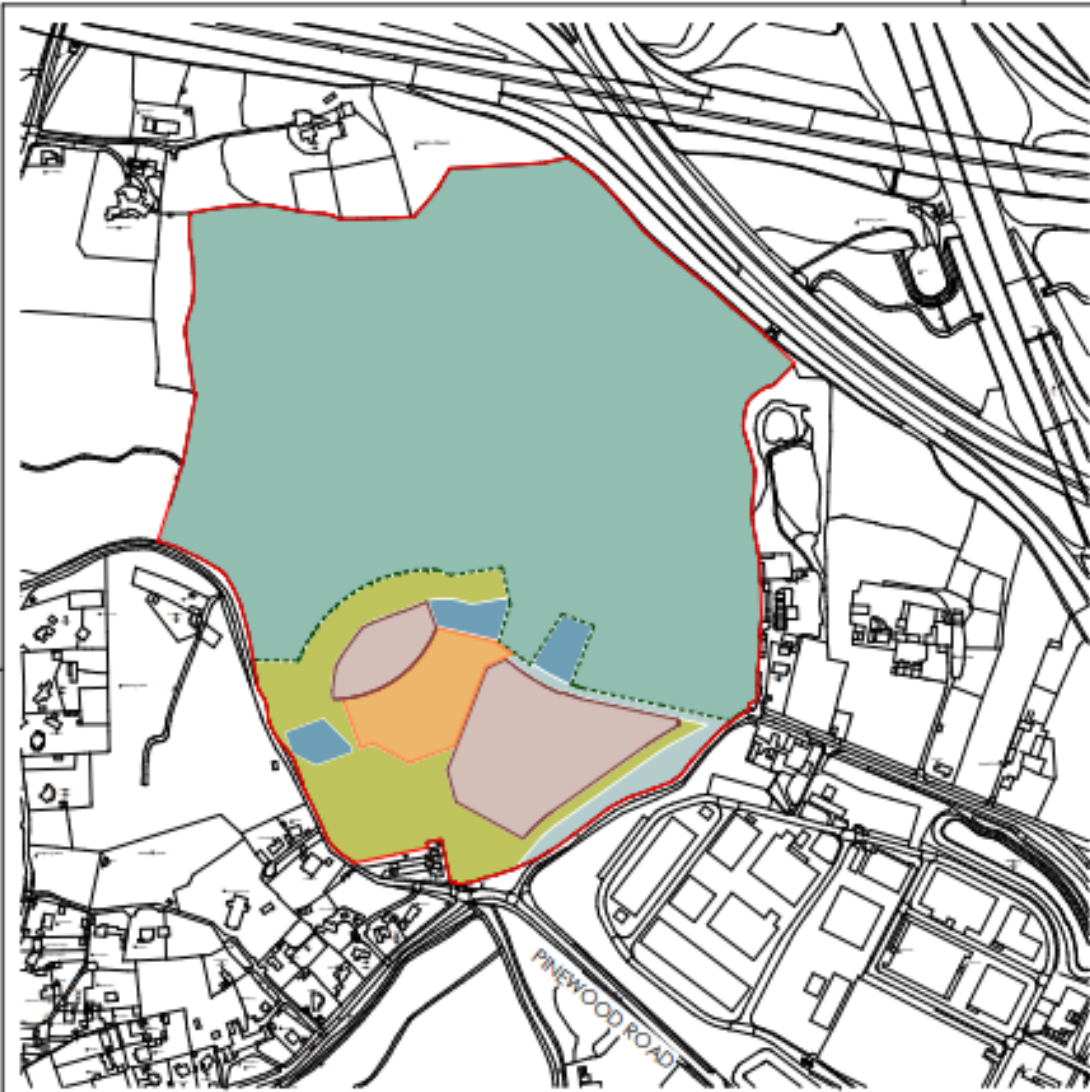


DIAGRAM KEY:

- APPLICATION BOUNDARY
- BUILT FORM (BUILDINGS, PARKING AND ASSOCIATED INFRASTRUCTURE)
- BACKLOT
- PARKING
- GREEN INFRASTRUCTURE
- NATURE RESERVE / RECREATION
- ACCESS AND MOVEMENT

Notes:

The land use parameters comprise built form (including access, parking and servicing), backlot, parking, green infrastructure and nature reserve / recreation.

0m 50 100 200 300 500m

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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Submittal	Drawing No.	Rev
P01	27.06.22	ISSUED FOR PLANNING	LW	JH	PLANNING	S2	3939-FBA-02-00-DR-A-01_004	P01
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					ALDERBOURNE FARM	3939	<b>FAULKNERBROWNS ARCHITECTS</b> 	
					Drawing Title			
					PP4 LAND USE		Faulkner Browns LLP Deodar House 100 Thurston Way Kingtonville Newcastle upon Tyne NE12 8QW T+44(0)191 268 8007 F+44(0)191 2 478132	
Date		Scale	Drawn By	Checked By				
JUN '22		1 : 5000	JH	BS				



**DIAGRAM KEY:**

- APPLICATION BOUNDARY
- GREEN INFRASTRUCTURE
- NATURE RESERVE
- EXISTING TREES RETAINED

**Notes:**

The development will support the delivery of a 10% minimum biodiversity net gain through green infrastructure provision and the nature reserve. This will include a comprehensive landscape and ecological enhancement scheme for the application site.

The green infrastructure will include boundary treatments and stand off; protection of existing key landscape features / assets; provision of new / enhanced landscape and ecology.

The boundary provision will generally be a minimum of 10m in depth (other than areas adjacent to points of access) subject to detailed design and approval under reserved matters, with appropriate landscaping provision where building zones are close to adjacent residential properties (typically a 25m depth of woodland planting).

Access points will be provided to the site through the green boundary areas. These access points will be located to minimise loss of existing vegetation.



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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Station	Subsidiary	Drawing No.	Rev
P01	29.06.22	ISSUED FOR PLANNING	LW	JH	PLANNING	S2	3939-FBA-02-00-DR-A-01_005	P01
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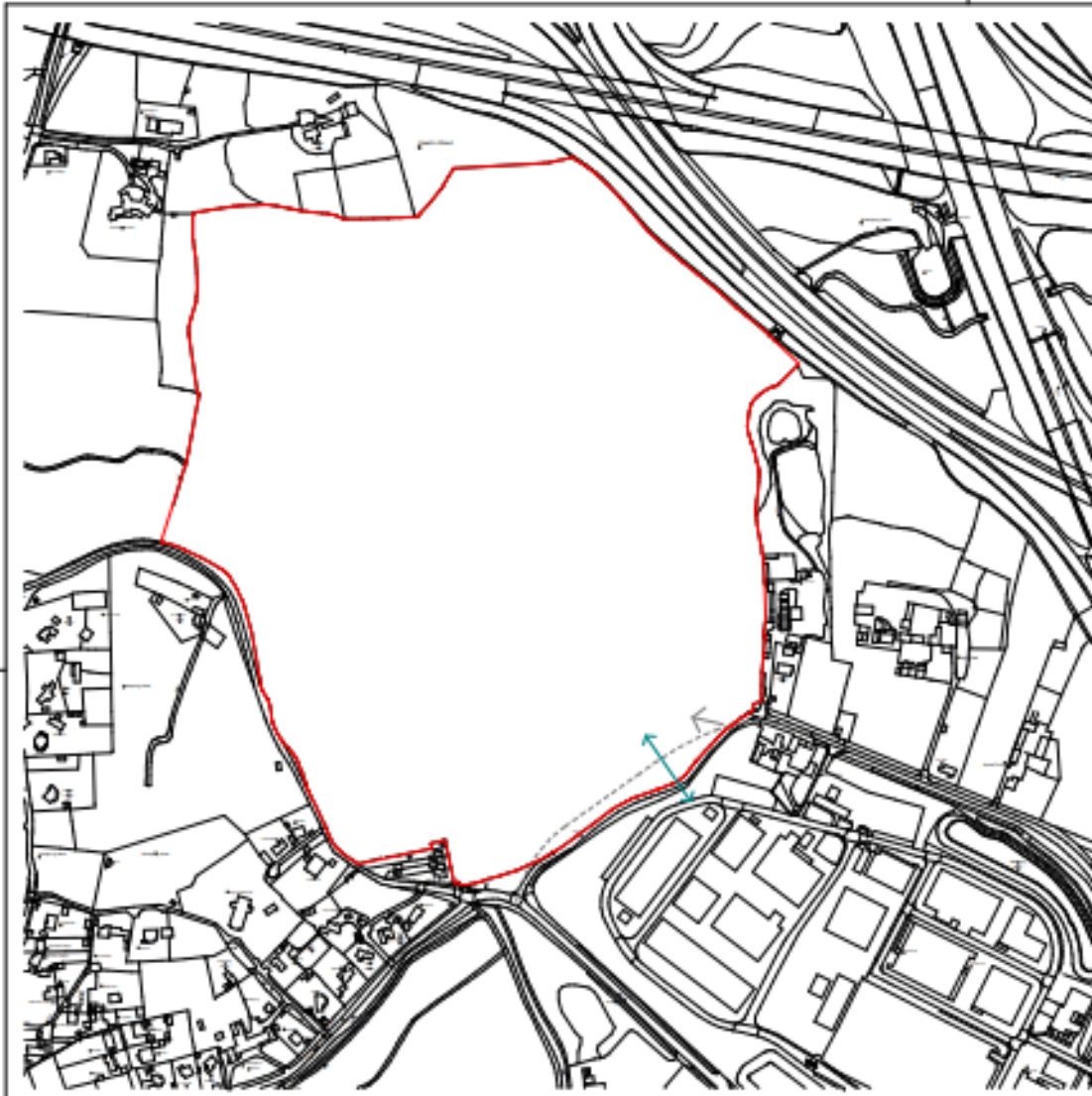


DIAGRAM KEY:

- APPLICATION BOUNDARY
- PRINCIPAL ACCESS
- - - RE-ALIGNED HIGHWAY
- ↔ PEDESTRIAN ACCESS LINK TO PINEWOOD EAST


**Notes:**

The site will be accessed principally from the re-aligned and enhanced Sevenhills 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.



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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Suitability	Drawing No.	Rev
P01	27.06.22	ISSUED FOR PLANNING	LW	JH	PLANNING	S2	3939-FBA-02-00-DR-A-01_006	P01
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					ALDERBOURNE FARM	3939	FAULKNERBROWNS ARCHITECTS	
					Drawing Title			
					PP6 ACCESS AND MOVEMENT	Faulkner Browns LLP Dabson House Northumberland Way Kingsnorth Medway Kent ME12 8QW T: +44(0)1622 268 8007 F: +44(0)1622 2476132		
Date		Scale	Drawn By	Checked By				
JUN '22		1 : 5000	JH	BS				

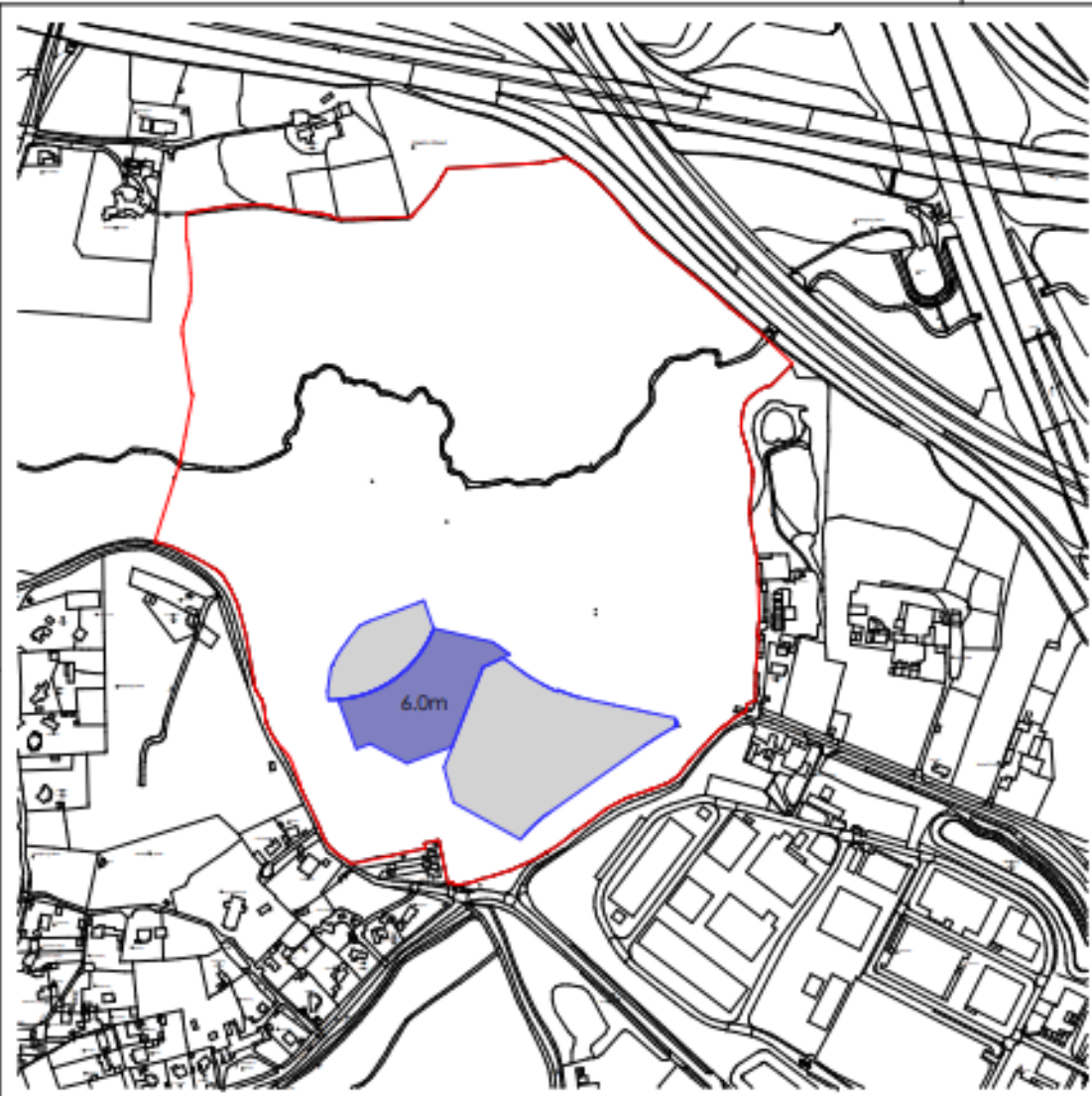


DIAGRAM KEY:

- APPLICATION BOUNDARY
- BUILDING HEIGHT ZONE +6.0M
- VARIABLE TEMPORARY SETS UNDER MANAGEMENT PLAN

**Notes:**

The maximum height of any building within the build area 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 PP2.


Within the movement zone and parking areas, 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 and security buildings.

There may also be additional rooftop infrastructure (such as PV cells and plant). These are generally excluded on the height parameters as they will be minor in terms of appearance.

0m 50 100 200 300 500m

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Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev
P01	27.06.22	ISSUED FOR PLANNING	LW	JH	PLANNING	S2	3939-FBA-02-00-DR-A-01_007	P01
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					ALDERBOURNE FARM	3939	FAULKNERBROWNS ARCHITECTS	
					Drawing Title			
					PP7 BUILDING HEIGHTS			
					Date	Scale	Drawn By	Checked By
					JUN '22	1 : 5000	JH	BS
					Faulkner Browns LLP Oakton House Northenden Way Biddulph Newcastle upon Tyne NE12 6JH T: +44(0)161 2683007 F: +44(0)161 2476132			

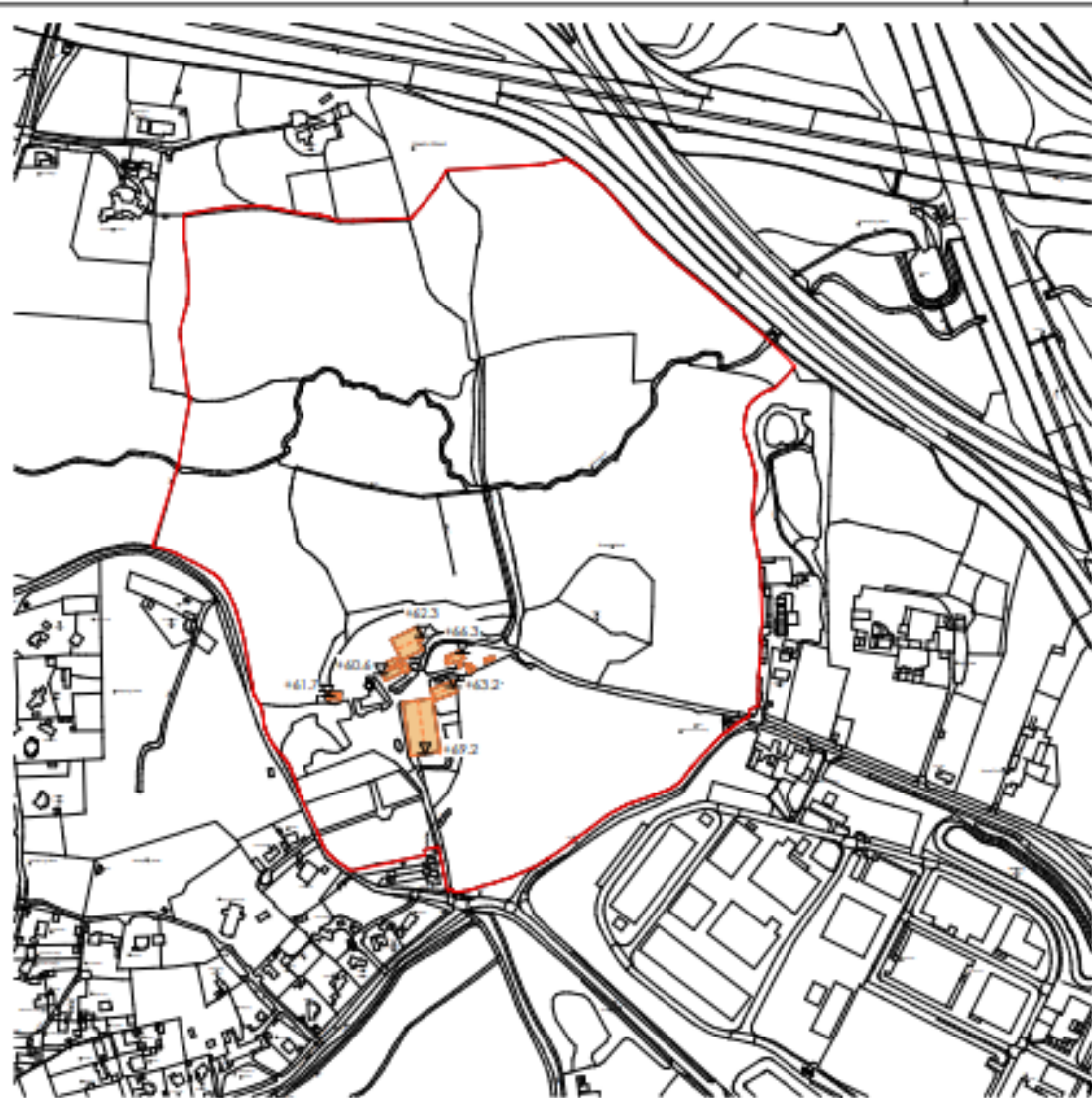


DIAGRAM KEY:

- APPLICATION BOUNDARY
- PROPOSED DEMOLITIONS
- M EXISTING MAXIMUM HEIGHTS

Notes:  
Source - topographic survey



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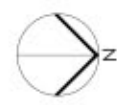
Rev	Date	Revision Notes	Drawn By	Checked By	Drawing Status	Subsidiary	Drawing No.	Rev.
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					Drawing Title	Faulkner Browns LLP Dalton House Northumbrian Way Killingworth Newcastle upon Tyne NE22 6JW T+440141 268 8007 F+440141 2476100		
					Date	Scale	Drawn By	Checked By
					JUN '22	1 : 5000	JH	BS

**Appendix D - Illustrative Masterplans**





- KEY:**
- Application boundary
  - Landscaped areas
  - Hardstanding areas
  - Vehicular circulation
  - Sound stages
  - Workshops
  - Workshops with office levels above
  - Studios operations facilities
  - MSCP







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## **APPENDIX E: 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** in proximity of visual receptors as shown on PP7 – Building Heights;
2. **Green infrastructure** of 25-30m around Pinewood South (except for access points) – as shown on PP4 – Green Infrastructure. Green infrastructure at Alderbourne Farm of 10 – 25 (except for access points) –as shown on PP4 – Green Infrastructure;
3. **Retention of high and medium value trees.** More replacement trees would be provided than lost;
4. The **woodland belts** provided;
5. Deliver a minimum of 10% **biodiversity net gain**;
6. **Lighting** will be designed in accordance with best practice guidance and as set out in the Outline Framework Lighting Strategy;
7. **Surface Water Drainage scheme**;
8. **Seven Hills Road Improvement Scheme**;
9. **Climate Change** commitments:
  - Dynamic thermal modelling of the buildings would 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;
  - 100% low energy (LED) lighting;
  - 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. An **Energy Strategy** prepared and submitted for approval;
11. A **Waste Strategy** prepared and submitted for approval;
12. External night working within the production area will be subject to an **Operational Management Plan**;
13. Maintain and extend the operation of four **shuttle bus services** between the Pinewood Studios and nearby stations;

14. 5% of all parking spaces at the Proposed Scheme will be provided with fast active **electric vehicle charging facilities** to promote sustainable travel methods, with a further 5% of parking spaces provided with appropriate infrastructure to allow charging points to be implemented in the future;
15. The Production Studio soundstages would be designed with building envelopes that provide a very high level of **sound reduction**;
16. External **noise generation** from mechanical and electrical building services will be designed to be in accordance with BS 4142;

Tertiary Mitigation - actions to meet legislation requirements, or standard practices.

17. A **Construction Environmental Management Plan** would be prepared, CEMP;
18. **Water:** Use of pollution prevention systems in line with EA Pollution Prevention Guidance;
19. A **Materials and Waste Management Strategy** (MWMS) for construction and operation stage, would be produced;
20. A **Whole Life Carbon Study** would be produced;
21. Appropriate **gas protection** measures would be installed;

Secondary mitigation – further actions required.

22. A detailed **Bird Nest Box Scheme**, targeted at species of conservation concern endemic to the area such as mistle and song thrush, house sparrow, starling, swift, and spotted flycatcher would be prepared;
23. A detailed **Bat Mitigation scheme** including provision of alternative roosts such as a bat barn and bat box scheme;
24. Sustainable travel options would be encouraged through a **Travel Plan**;
25. **Landscape and Ecological Management Plan** prepared and submitted; and
26. **Noise minimising design** measures such as, earth bunds, noise barriers and low noise road surfacing where required.

Where appropriate these mitigation measures will be secured by planning condition or S106 planning agreement obligations.